



Oregon

Tina Kotek, Governor

Department of Environmental Quality

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December 6, 2023

Kelly Madalinski (via email to kelly.madalinski@portofportland.com)
Harbor Environmental Manager
Port of Portland
Portland, OR

Re: Comments on *Source Control Completion Letter*
Port of Portland Terminal 4 Slip 3 Upland Facility
ECSI No. 0272

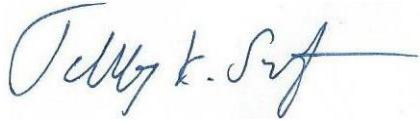
Dear Mr. Madalinski:

The Department of Environmental Quality (DEQ) has reviewed the document entitled *Source Control Completion Letter* dated November 7, 2023, prepared by the Port of Portland (Port) for the Terminal 4 Slip 3 upland facility. The letter describes the investigation and implementation of source control measures (SCMs) for Basins D, J, K1 and K2 following submittal of the September 2021 *Stormwater Evaluation Report*. DEQ provided the letter and the comments herein provided to EPA and the Tribes. EPA concurred with DEQ's comments and suggested that the contents of the *Source Control Completion Letter* be incorporated into a future deliverable. DEQ has the following comments on the report:

- 1) DEQ generally agrees with the findings of the letter report. Although the infiltration feature in basin K1 has a status that is best described as “conditionally controlled pending effectiveness demonstration”, the findings of the year 2 performance monitoring report indicate the basin K1 SCM is effective in controlling contamination sources to the Willamette River via the stormwater pathway.
- 2) The letter provides a high-level overview of investigations and SCMs implemented in selected Slip 3 basins to limit the potential for stormwater to discharge to the Willamette River. However, the letter does not contain a level of detail and discussion appropriate for a Stormwater Source Control Evaluation (SW SCE) prepared in accordance with [DEQ's Guidance for Evaluating the Stormwater Pathway at Upland Sites](#). Additionally, DEQ does not issue a source control decision (SCD) by pathway but instead by site. DEQ believes the best path forward is for the Port to prepare a SW SCE for review by the TCT. DEQ would then engage proactively with the TCT to obtain concurrence with the determination that the stormwater pathway has been adequately controlled to facilitate a future SCD and document that in our approval of the SW SCE Report. The contents of the *Source Control Completion Letter* should be included in the SW SCE and not just referenced. When all the relevant pathways (i.e., stormwater, groundwater, overwater activity) have been addressed DEQ will prepare a SCD for the site.

DEQ appreciates the diligence of the Port in investigating and addressing stormwater source control issues at Terminal 4 Slip 3. If you have questions or want to discuss further, please contact me by phone (503) 229-5024 or email (jeff.schatz@deq.oregon.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff K. Schatz". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jeff K. Schatz, R.G.
Project Manager
Northwest Region Cleanup Program

cc: Laura Hanna, Remedial Project Manager, EPA Region 10
Josie Clark, Remedial Project Manager, EPA Region 10
Brook Harmon, P.E., Project Engineer, MFA
Heidi Nelson, Environmental Engineer, DEQ
Sarah Greenfield, Portland Harbor Coordinator, DEQ
David Lacey, Source Control Coordinator, DEQ

(jks:JKS)