

MEMORANDUM | December 19, 2023

TO Jeff Schatz and David Lacey, Oregon Department of Environmental Quality (DEQ)

FROM Peter Shanahan, HydroAnalysis LLC (HALLC); Jennifer Hart and Gail Fricano, Industrial Economics, Inc. (IEC)

SUBJECT Five Tribe review of “2023 Additional Action Summary Report, Seaport Midstream Partners, LLC, Portland Terminal,” dated November 10, 2023

This memorandum, submitted on behalf of the Five Tribes,¹ reviews the *2023 Additional Action Summary Report, Seaport Midstream Partners, LLC, Portland Terminal* (herein, the report) prepared by AECOM on behalf of Seaport Midstream Partners, LLC (AECOM 2023). In addition, we reviewed DEQ’s draft comments on the report (herein, DEQ’s draft letter; DEQ 2023), which we found to be thorough and appropriate. The Five Tribes’ comments on both the report and DEQ’s draft letter are provided below.

Comments on AECOM’s Report

1. We recommend the report be revised to include a complete description of the multi-use ports (MUPs). Both the construction and use of MUPs should be described.
2. On page 8, the report indicates that a six-inch sump was constructed at the bottom of monitoring wells MW-18 and MW-19; however, no such feature appears in the logs for these wells. We recommend that either the text or the well logs be edited to be consistent.
3. On page 11, a footnote states that “Available information suggests that South Tank Farm barrier wells BW18, BW20, BW22, BW23, and BW25 appear to have been abandoned in place.” The qualifying language in the footnote (“...suggests...appear to have...”) indicates uncertainty. We recommend the report provide a more definitive description of what is known and what is unknown about these wells and how they were abandoned.
4. Table 3 in the report includes a column entitled “Barrier Well Condition”; however, there is no indication what particular condition is being reported. We presume this is some indication of the physical condition of the well, but the condition noted for some wells changes over time, back and forth, between ‘Fair’ and ‘Good’ and in some instances from ‘Poor’ to ‘Good,’ a seemingly impossible change for the physical condition of a well. We recommend that the report provide an

¹ The five tribes are the Confederated Tribes of the Grand Ronde Community of Oregon, the Nez Perce Tribe, the Confederated Tribes of Siletz Indians, the Confederated Tribes of the Umatilla Indian Reservation, and the Confederated Tribes of the Warm Springs Reservation of Oregon.

explanation of the meaning of “Barrier Well Condition” and definitions for the terminology used in this column.

Comments on DEQ’s Draft Letter

5. In DEQ’s General Comment #3a, DEQ requests “additional delineation of the gasoline release.” We presume DEQ is requesting delineation of the plume of impacted groundwater, and if so, we recommend DEQ revise the comment to clarify this request.

References

AECOM. 2023. 2023 Additional Action Summary Report, Seaport Midstream Partners, LLC, Portland Terminal, 9930 NW St. Helens Road, Portland, Oregon 97231, DEQ No. WMCVC-NWR-00-16, ECSI No. 1528. AECOM, Portland, Oregon. November 10, 2023.

DEQ. 2023. DEQ Comments on 2023 Additional Action Summary Report, SMP Terminal (ECSI No. 1528), Portland Harbor Superfund Site. Letter by Jeff K. Schatz to J. Douglas Hall. December 5, 2023 (marked Draft).