



# Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

November 20, 2023

*via electronic delivery (email)*

Gil Cobb, RG  
Point Source Solutions, LLC  
5317 NE St. Johns Road, Suite D  
Vancouver, WA 98661

Re: **DEQ Response to Preliminary Stormwater Assessment and Source Control Evaluation Work Plan**  
Golden Bear Ventures PPA (ECSI No. 6544)

Dear Gil Cobb,

The Oregon Department of Environmental Quality (DEQ) has reviewed the document entitled ***Preliminary Stormwater Assessment and Source Control Evaluation Work Plan*** (work plan) submitted by Point Source Solutions, LLC on behalf of Golden Bear Ventures, LLC and dated August 28, 2023. The work plan proposes screening catch basin sediments and stormwater discharge to further investigate potential sources of contamination from 1825 Northeast Argyle Street in Portland, Oregon (Site). DEQ has the following comments on the work plan.

1. ***Section 3.2 Stormwater Assessment and Drainage Evaluation:*** During the sewer scope investigation, areas of in-pipe sediment accumulation should be identified to inform feasibility of sediment sample collection. After the stormwater system is mapped onsite, an updated map with final representative sample locations along with written justification for the selected locations should be provided for DEQ review and approval.
2. ***Section 3.3 Site Inspection & Best Management Practices for Site Control Measures:*** Please fully describe the type of storage (e.g., final products, raw materials, production supplies, or other items) and where storage occurs onsite, including interior and exterior storage locations.
3. ***Section 4.1 Catch Basin Sediment and Stormwater Sampling Plan:*** Based on Figure 3, it appears there are eight catch basins and two trench drains located onsite; however, it is unclear if all or only select catch basins will be considered “representative”. As stated in Comment #1, an updated map with final representative sample locations should be created based on the findings from the sewer scope investigation and submitted to DEQ for review and approval prior to sampling.
4. ***Section 4.1 Catch Basin Sediment and Stormwater Sampling Plan:*** The list of analytes proposed for the sediment and stormwater samples does not match the analytes and analytical methods listed in Section 4.3 or 5.0. For example, Section 4.1 only lists cadmium by Environmental Protection Agency (EPA) method 6020 for sediment

samples; however, Section 4.3 lists EPA methods 6010, 6020, and 200.8, and Section 5.0 lists eleven other metals in addition to cadmium. The analyte and method lists should be rectified for consistency across the sections. Additionally, please confirm that method detection limits for the chosen analytical methods are less than the Columbia Slough screening level values for sediments and stormwater. See Comment #9 for DEQ's recommended constituents of potential concern (COPC).

5. **Section 4.1 Catch Basin Sediment and Stormwater Sampling Plan:** Please clarify if a National Pollutant Discharge Elimination System (NPDES) 1200Z Industrial Stormwater General Permit has been issued for the site. Although DEQ Cleanup Program does not require including the 1200Z permit requirements in the collection criteria, sampling requirements can be combined if a 1200Z permit has been issued for the site. Please note that the DEQ Cleanup program will not evaluate the following proposed analytes for demonstrating upland stormwater source control: nitrate, pH, total oil & grease, fecal coliforms, total phosphorous, and biological oxygen demand. Additionally, evaluation of seasonal variability can be helpful for understanding the site, but for DEQ Cleanup Program purposes, seasonality does not need to be strictly tied to the calendar year.
6. **Section 4.1 Catch Basin Sediment and Stormwater Sampling Plan:** The NPDES 1200Z permit statewide benchmark screening levels can be used as a weight of evidence within the evaluation; however, please use the following primary Columbia Slough screening level values for sediments and stormwater.
  - Sediments: [General Columbia Slough Screening Level Values Table- Upland Source Control Screening Levels\(left column\)](#)
  - Stormwater- [Guidance for Evaluating the Stormwater Pathway at Upland Sites: Appendix D Stormwater Data Reporting and Screening Table for non-Portland Harbor Sites](#)
7. **Section 4.4 Handling of Investigation-Derived Waste:** Disposable equipment and personal protective equipment (PPE) are listed as items that will be stored in a drum and transferred to a disposal facility under a waste profile. These items are typically disposed of in the general municipal trash after field activities. If disposable equipment and PPE are to be disposed of in a different manner than the soil/sediment cuttings or stormwater, please clarify how these items will be handled.
8. **Section 4.4 Handling of Investigation-Derived Waste:** Please specify that any excess soil/sediment cuttings or stormwater that will be transferred off-site for disposal will be transported to a DEQ-permitted disposal facility.
9. **Section 5.0 Analytical Plan:** Based on the site's history, DEQ recommends analyzing sediment/solids samples and stormwater samples for all polycyclic aromatic hydrocarbons (not just carcinogenic) and the list of metals presented in Section 5.0. Additionally, based on the growing information showing the toxicity of N-(1,3-dimethylbutyl)-N'-phenyl-p-phenylenediamine (6PPD) and 6PPD-quinone (6PPD-Q) to aquatic wildlife, DEQ believes it would be pertinent to analyze for 6PPD and 6PPD-Q in at least stormwater samples collected from the Outfall.
10. **Section 5.0 Analytical Plan:** Please include an analysis prioritization list in the event there is not enough sediments to analyze for all COPC.
11. **Section 7.0 Report Preparation:** Please include discussion on Progress Report submittals required under the Consent Judgment Section 7.H. Each quarterly Progress Report should report actions taken over the last three months, actions scheduled to occur in the

next three months, summary of sampling or data results generated, and a description of any problems encountered and actions to resolve.

12. **Section 7.0 Report Preparation:** Although scheduling of the in-water sediment investigation work is at the discretion of Golden Bear Ventures, LLC, DEQ would like to note that preparation for and completion of the in-water sediment work can be completed concurrently with the stormwater source control evaluation, if preferred.

Please revise the work plan and resubmit to DEQ for review by December 29, 2023. If you have any questions, please contact me at (503) 926-2257 or via email at [rebecca.digiustino@deq.oregon.gov](mailto:rebecca.digiustino@deq.oregon.gov).

Sincerely,



Rebecca Digiustino  
Project Manager  
NWR Cleanup Section

ec: Sarah Miller, Columbia Slough Source Control Coordinator, DEQ  
Zach Francis, Kidder Mathews  
Richard H. Allan, Marten Law

(rdd:RDD)