



Oregon

Tina Kotek, Governor

Department of Environmental Quality

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March 21, 2024

Kelly Madalinski (via email to kelly.madalinski@portofportland.com)

Harbor Environmental Manager

Port of Portland

Portland, OR

Re: DEQ Comments on *Annual 2023 Groundwater Monitoring and LNAPL Removal Report*
Terminal 4 Slip 3 Upland Facility
ECSI No. 272

Dear Mr. Madalinski:

The Department of Environmental Quality (DEQ) reviewed the Port of Portland (Port) document entitled *Annual 2023 Groundwater Monitoring and LNAPL Removal Report, Terminal 4 Slip 3 Upland Facility* dated February 14, 2024. The report and associated appendices describe groundwater monitoring and light non-aqueous phase liquid (LNAPL) removal associated with ongoing implementation of the upland Record of Decision (ROD) and to support achieving control of contamination sources that could impact the in-water remedy. DEQ provided the United States Environmental Protection Agency (EPA) and the Tribes an opportunity to review and comment on the report and DEQ's draft comments, although they declined to provide additional substantive comments. DEQ offers the following comments on the report:

Specific Comments

- 1) Section 5.2.3 Additional Assessment – DEQ concurs it may be appropriate to re-evaluate the expanded analyte list initiated in 2022 based on the forthcoming porewater data collected as part of the in-water cleanup. DEQ notes the significant reduction in the detected concentrations of dissolved manganese between HC-12D and the BEBRA wells BE-1 and BE-5, suggesting that reducing conditions caused by petroleum hydrocarbon contamination may attenuate as groundwater approaches the head of Slip 3.
- 2) Section 6.1 LNAPL Monitoring and Removal – Despite meeting the requirements for suspending LNAPL removal and monitoring, DEQ concurs with (and appreciates) the Port's willingness to continue the program on an annual basis.
- 3) Section 6.4 Recommendations for Additional Monitoring – In consideration of continued exceedances of the ROD Compliance Criterion for diesel-range total petroleum hydrocarbons (TPH) in HC-5 and pending porewater analytical results for the in-water project, DEQ concurs with the recommended groundwater sampling for 2024.
- 4) Figure 3 LNAPL Monitoring/Removal – According to information in Table 2, the volume of LNAPL recovered from MW-20 in 2023 should be 0.45 gallons. Please revise accordingly.
- 5) Figure 6 Groundwater Analytical Results – DEQ notes that the depicted concentrations of diesel- and residual-range TPH for BE-1 and BE-5 are not consistent with data provided in Table 3 and

appear to be a duplication of the analytical data for HC-5 shown in the same figure. Please revise accordingly.

Please revise the report in accordance with the comments herein provided and resubmit within 45 days. If the Port requires additional time, please contact me to arrange a mutually agreeable alternative timeframe. DEQ appreciates the continued efforts of the Port to meet its source control obligations and will continue to work collaboratively with the Port to ensure timely review of future submittals. Please contact me by phone (503) 229-5024 or email (jeff.schatz@deq.oregon.gov) if you have questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff K. Schatz", with a long horizontal flourish extending to the right.

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

cc: Laura Hanna, EPA Region 10
Josie Clark, EPA Region 10
Heidi Nelson, DEQ
Sarah Greenfield, DEQ
David Lacey, DEQ

(jks:JKS)