REGION 10
SEATTLE, WA 98101

May 1, 2024

MEMORANDUM

SUBJECT: EPA Comments on the Draft Outfall 22B IRAM Performance Monitoring 2023 Annual Report
Rhone Poulenc, Portland, Oregon
ECSI # 155
November 9, 2023

FROM: Laura Hanna, RG, Remedial Project Manager
Superfund and Emergency Management Division

TO: Dave Lacey, Project Manager and Portland Harbor Source Control Lead Worker
Northwest Region Cleanup Program, Oregon Department of Environmental Quality

The following are the United States Environmental Protection Agency's (EPA) review comments pertaining to the document entitled *Outfall 22B IRAM Performance Monitoring 2023 Annual Report* (IRAM Report). This document was prepared by Golder Associates Inc. on behalf of StarLink Logistics, Inc. (StarLink) for the Rhone Poulenc Site. Outfall 22B is a City of Portland storm sewer that discharges to the Willamette River upstream of the Burlington Northern Santa Fe railroad bridge. The Outfall 22B IRAM was constructed as an interim remedial action measure (IRAM) for the former Rhône Poulenc (RP) facility. The RP is located at 7700 NW Front Ave., Portland, Oregon in Portland, Oregon and listed as Environmental Cleanup Site Information (ECSI) #155.

*EP*A understands that the primary purpose of the IRAM Report is to document results of sampling at Outfall 22B and to demonstrate that the IRAM at Outfall 22B storm sewer system pathway has adequately addressed the infiltration of contaminated groundwater and pathway does not pose an unacceptable risk to the Willamette River. The proposed scope of work for the IRAM performance monitoring is presented in the Final Outfall 22B IRAM Performance Monitoring, Sampling and Analysis Plan (SAP) dated February 2015. The report documents the results of sampling and observations conducted in June 2023. For the purposes of assessing risk to the Willamette River, analytical results of sampling are compared to the Portland Harbor Superfund Site (PHSS) cleanup levels (CULs) for surface

water listed on Table 17 of the record of decision (ROD) (EPA 2017) or to site-specific screening level values (SLVs) for constituents for which no CUL is listed on Table 17 of the ROD.

EPA's comments are categorized as "Primary," which identify concerns that must be resolved to achieve the objective; and "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the objectives. Each comment is carried forward from EPA's review of the prior 2020 and 2021 IRAM Reports. EPA notes that these comments were not incorporated into the 2022 IRAM Report so are requesting a 2023 IRAM Report revision.

Primary Comments

1. Sections 5.0 should be revised to acknowledge a deviation from the SAP where the laboratory method detection limits (MDLs) for individual carcinogenic polyaromatic hydrocarbons (cPAHs) exceed the PHSS CULs by one to two orders of magnitude. EPA acknowledges that the MDLs in the 2015 SAP are being followed. However, post-ROD monitoring should fully integrate the CULs listed on Table 17 of the ROD as the primary performance monitoring criteria. EPA has noted on the laboratory report in Appendix C, that analysis for PAHs was performed by EPA Method 8270E. Analytical methods are expected to achieve method detection limits (MDLs) that are less than the CULs used for performance monitoring. EPA's expectations are that all efforts will be made to achieve the lowest reasonably achievable MDLs to meet the criteria. If the sampling techniques and analytical methods cannot achieve MDLs compatible with the criteria, the report must describe how the data will be used to meet the study objectives and what effects the MDLs have on achieving the performance monitoring objectives.

2. Data summation methods detailed in the Program Data Management Plan (EPA 2020) should be used to calculate totals values for PCBs, cPAHs, dioxins/furans, DDx, and chlordanes in all appropriate tables to allow for comparison as part of the in-water Sufficiency Assessment. The report text in Section 6 should be modified to demonstrate how the data summation methods are consistent with the methods outlined in the Program Data Management Plan and a reference to the document should be included in the report. Calculation of totals following the methods outlined in Program Data Management Plan is important for consistency of data collected within the PHSS and improves the data quality objectives (DQOs) and allows for a meaningful comparison of the results with the CULs.

3. According to the SAP, if one or more organic constituents are detected at a concentration above their respective SLVs, additional sampling at individual manholes MH-10, MH-9, MH-8, MH-7, MH-6, MH-5, MH-4, MH-3, and Manhole 9 on Metro property, will be required. The report should discuss this requirement for sampling at individual manholes and how this requirement will be addressed. The deviation from the SAP should be noted in Section 5.0.

To Be Considered

1. Section 7.3, the statement that "Risk to river receptors from Outfall 22B sediment during non-stormwater flow conditions is considered low because TSS concentrations in outfall discharge were less than the reporting limit of 5 milligrams per liter (mg/L) which is well below the industrial stormwater discharge benchmark of 100 mg/L (there is no PHCL or SLV for TSS)" should be deleted or revised. It is not valid to use a dry weather discharge TSS result to evaluate risk from sediment transported from OF-22B because TSS and sediment are expected to be much higher during wet weather stormwater flow.

References

EPA. 2017. *Record of Decision Portland Harbor Superfund Site Portland, Oregon*.

EPA. 2020. *Program Data Management Plan, Portland Harbor Remedial Design Investigation – Portland Harbor Superfund Site. U.S. Environmental Protection Agency Region 10, Seattle, Washington.* August. Data Management Plan is available on the PH Environmental Data Portal at this public link: http://ph-public-data.com/document/PHIDB2020/

cc: Katie Young, CDM Smith