



Oregon

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October 5, 2023

Sent via email

HDNGR NW Industrial, LLC
1750 NW Front Ave. #106
Portland, Oregon 97209

**RE: Stormwater Source Control Evaluation, Intrepid Marble and Granite
4000 NW St. Helens Road, Portland, Oregon. ECSI #6148**

Dear HDNGR Representative,

The Oregon Department of Environmental Quality (DEQ) and the Environmental Protection Agency have reviewed your Stormwater Source Control Evaluation for the Intrepid Marble and Granite industrial facility. This document was prepared on your behalf by EVREN Northwest and is dated April 11, 2023.

Primary Comments

1. End of pipe confirmation sampling is needed to verify that replacing, repairing, and/or recoating the facility roofs has addressed the high concentrations of zinc previously detected in stormwater runoff. As noted in Section 8.1, zinc concentrations in stormwater samples were two orders of magnitude higher than the ROD (EPA 2017) Table 17 cleanup level as updated (EPA 2020) and plot on the steep portion of the rank-order curves in DEQ's upland stormwater guidance (DEQ 2015).

From Table 2, *Summary of Analytical Data, Roof Drains*, the zinc concentrations in stormwater samples from roof drains #2 and #4, are much lower between early and late 2022 following mid-year partial roof replacement work. Table 1, *Summary of Analytical Data, Storm Water*, however, does not reflect the zinc decrease in the total stormwater discharge analysis from the site before and after partial roof replacement work. With roof replacement presumably now complete, please provide an additional site-wide total stormwater discharge analysis for copper, lead, nickel, and zinc as well as semi-volatiles analysis to evaluate performance of the roof replacement as a Source Control Measure.

2. Due to new data showing dioxins closer to Outfall 19 (OF-19), EPA asks that the Site add dioxins/furans (D/Fs) as an analyte during an additional stormwater sampling event.

The rationale: Surface sampling was conducted statewide within the Portland Harbor Superfund Site in 2018. The sample taken nearest to Outfall 19 did not show elevated D/Fs, however this sample location was approximately 200 feet away from OF-19 and on the other side of a floating dock, near RM9W-C023. During the 2021 Pre- Design Investigation in-water sampling work, the RM9W Project Area collected a surface sediment sample at the mouth of OF-19 and a stormwater solids sample from OF-19 that exceed Portland Harbor remedial action levels (RALs). The sediment location, RM9W-C022 is shown on the excerpt in Figure 1 (included below) (FMC 2022). The surface sediment concentration of (the dioxin compound PeCDD) was 3.57 pg/g and the surface

sediment concentration of TCDD was 1.03 pg/g which are above the respective RALs. The in-line stormwater sediment trap solids collected from location RM9W-AAP929 also exceeded the PeCDD RAL, ranging from 2.00 to 3.36 pg/g in November and June, 2021, respectively. While there are multiple sources of material that may impact the concentrations of D/Fs in surface sediment, EPA is looking to use empirical data to confirm that the Site is not a contributor of D/Fs to Outfall 19.

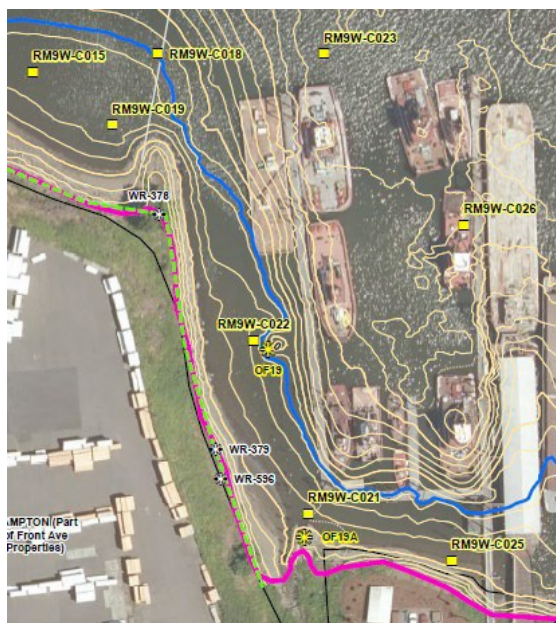


Figure 1: Excerpt from the Final RM9W PDI Evaluation Report showing location of RM9W-C02 adjacent to OF-19

To Be Considered

1. Provide total polycyclic aromatic hydrocarbon (PAH) and carcinogenic PAH (cPAH) results in Table 1 and describe the summation method. PAHs are often evaluated as a summation of total PAHs in addition to evaluation of individual PAH compounds. Appendix D provides plots of rank-order curves for total PAHs from DEQ's upland stormwater guidance (DEQ 2015), but summations are not provided in Table 1. The summation of cPAHs (as benzo(a)pyrene equivalent) should also be provided for a more direct comparison to the surface water CULs. Data handling and summation should follow Section 6 of the Portland Harbor Program Data Management Plan which can be found at EPA's website: <http://ph-public-data.com/document/DMP2021/>.
2. The SCE should include the methods used to estimate the percentage of total annual stormwater volume that infiltrates via the dry well versus the amount that discharges to City Outfall 19. Section 9.0 notes that an estimated 20 percent of the stormwater at the Site infiltrates in the dry well, but it is unclear how that estimate was derived. Understanding the frequency and/or volume of discharge to the City Outfall is helpful for characterizing stormwater loads from the Site.
3. Provide the flow capacity of the PerkFilter™ vault and the frequency of high-flow bypass. As shown in the PerkFilter™ product literature in Appendix D, the system includes a high-flow bypass assembly to divert flow that exceeds the treatment capacity of the filters and chamber. It is important to know how often treatment bypass occurs, and under what stormwater runoff

conditions. If possible, it should be noted whether treatment bypass was occurring during any of the storm sampling events.

- 4 Clarify the location of sample collection. Section 6.2.1 states that “The outflow pipe from the dry well to the downstream pump manhole was designated as the sampling point (ML001),” whereas the treatment configuration diagram on Figure 3 appears to show the sampling point from the treatment vault upstream of the dry well. It appears that either way, the sampled water is the effluent from the Perkfilter™ treatment vault, but the text or figure should confirm.
5. Clarify the replacement frequency of the media cartridges and/or the data inputs used to decide when media replacement is needed. Media filters need to be replaced at regular intervals to avoid diminished performance. The SCE report alludes to this and references the manufacturer inspection and maintenance guide in Appendix D, but there are no concrete maintenance frequencies listed in the manufacturer literature. The selected replacement frequency should be timed to occur before media performance deteriorates.

Matters of Style

- 1 Correct the empty page that appears on page 4. It is unclear if information is missing from the PDF or if a blank page was inadvertently added.
- 2 Individual sample points are preferred for rank-order curves that are provided in Appendix D instead of just the maximum detected concentration. Plotting the individual sample points provides a more complete picture of the distribution of concentrations detected during stormwater monitoring.

If you have any questions, please contact me.

Sincerely,



Kenneth Thiessen, CEG
Northwest Region Cleanup Section

cc: Michael Kaplan, HDNGR NW Industrial, LLC
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ECSI #6148