REGION 10
SEATTLE, WA 98101

January 22, 2024

MEMORANDUM

SUBJECT: EPA Comments on WR-209 Source Control Measures
Shore Terminals LLC, Portland, Oregon
ECSI # 5130
January 2023

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

TO: Kenneth Thiessen, RG, CEG, Project Manager
NWR Cleanup, Oregon Department of Environmental Quality

The following are the U.S. Environmental Protection Agency's (EPA) comments on the report titled *WR-209 Source Control Measures Shore Terminals LLC Portland Facility* prepared by GeoEngineers for the Shore Terminals LLC Portland Facility (site). The site is located at 9420 NW St. Helens Road in Portland, Oregon, at approximately river mile 5 W, and is listed as # 5130 in the Oregon Department of Environmental Quality (DEQ) Environmental Cleanup Site Information (ECSI) database. The site is located within the Portland Harbor Superfund Site (PHSS) and includes a riverbank adjacent to an in-water sediment management area in the remedial design area B1a.

EPA understands this WR-209 Source Control Measures report documents the cleanout of the conveyance line to the WR-209 outfall and post-cleanout dry weather sampling results from samples collected from the dry weather flow exiting the WR-209 outfall in September and October 2022.

EPA's comments are categorized as "Primary," which identifies concerns that must be resolved to achieve the study or assessment objectives; and "To Be Considered," which, if addressed or resolved, would reduce uncertainty, would improve confidence in the document's conclusions, or would best support the study's objectives.

Primary Comments

1. The report does not provide sufficient justification that dry weather flow attributed to groundwater intrusion poses no recontamination risk to the Willamette River. The Source Control Decision (SCD) should include a weight of evidence evaluation per the Portland Harbor Joint Source Control Strategy (DEQ and EPA 2005) and DEQ's upland stormwater guidance (DEQ 2009).

2. The stormwater component of the direct discharge pathway to the Willamette River should be included as part of the SCD. EPA understands that outfall WR-209 runs underneath the Shore Terminals property and discharges non-Facility stormwater that collects in the WR-209 ditch. However, Shore Terminals contributes dry weather flow via groundwater and overland flow to WR-209. Additional stormwater contributors to WR-209 such as the upland forested areas (e.g. Forest Park), Oregon Department of Transportation, and the railroad should be documented and any investigations summarized in the SCD, if available. The B1a Project Area Sufficiency Assessment considers unclaimed outfalls (such as WR-209) as sources that are not sufficiently assessed or controlled and this pathway has been identified as a data gap for source control (Jacobs 2020). Dry weather flow evaluations are a component of the direct discharge pathway, but a comprehensive evaluation of all discharges from WR-209 is needed to address the data gap identified in the sufficiency assessment.

To Be Considered

1. Surface water discharge evaluations should include all contaminants that have surface water cleanup levels in Table 17 of the PHSS Record of Decision (EPA 2017) and analytical results should be compared with the applicable cleanup levels. EPA notes that contaminants identified in surface sediment near the WR-209 outfall exceeding cleanup levels and/or remedial action levels or principal threat waste concentrations include PCBs, DDx, HxCFD,1,2,3,7,8-PeCDD, 2,3,4,7,8-PeCDF, and 2,3,7,8-TCDD (Jacobs 2022).

References

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

DEQ. 2009. *Guidance for Evaluating the Stormwater Pathway at Upland Sites.* January. Updated July 2017.

DEQ and EPA. 2005. *Portland Harbor Joint Source Control Strategy.* December.

Jacobs. 2020. *Portland Harbor Superfund Site B1a Area Remedial Design, Sufficiency Assessment Report*. Prepared by Jacobs, December 18.

Jacobs 2022. *B1a Area Pre-Design Investigation, Phase 1 Evaluation Report, Portland Harbor Superfund Site Bia Area Remedial Design, Portland, Oregon*. Prepared by Jacobs, December.

cc: Dave Lacey, DEQ
Hunter Young, EPA
Katie Young, CDM Smith