

MEMORANDUM | June 19, 2023

TO Erin McDonnell and David Lacey, Oregon Department of Environmental Quality (DEQ)

FROM Peter Shanahan, HydroAnalysis LLC (HALLC); Jennifer Hart and Gail Fricano, Industrial Economics, Inc. (IEc)

SUBJECT Five Tribe review of “Transition Zone Water Sampling Plan, Premier Edible Oils Site,” dated May 4, 2023

This memorandum, submitted on behalf of the Five Tribes,¹ reviews the *Transition Zone Water Sampling Plan, Premier Edible Oils Site* prepared by ERM on behalf of Burgard, a Series of MMGL LLC (ERM 2023).

Comments

1. The goal of the current sampling program is to collect transition zone water (TZW) samples to compare with samples collected previously. Our comparison of the proposed sampling methods to those used by ERM (2017) and Treadwell & Rollo (2014) finds them to be largely consistent. Thus, it appears that the results of this study should be comparable with those from prior studies.
2. We recommend the report include definitions of the transition zone and TZW.
3. On page 1, the report states “Therefore, TZW sampling results during low river stage will provide an upper bound for dissolved phase concentrations in the TZW.” There are limited data to support the contention that samples collected during low river stage will necessarily have higher concentrations than those collected during high river stage. Thus, we recommend the report be revised to say that sampling “during low river stage is expected to provide an upper bound for dissolved phase concentrations in the TZW.”

References

ERM. 2017. Letter to Oregon Department of Environmental Quality, Subject: Premier Edible Oils Site High River Stage Transition Zone Water Sampling Report. Environmental Resources Management, Inc., Portland, Oregon. March 3, 2017.

ERM. 2023. Transition Zone Water Sampling Plan, Premier Edible Oils Site, 10400 North Burgard Way, Portland, Oregon. Environmental Resources Management, Inc., Portland, Oregon. May 4, 2023.

Treadwell & Rollo. 2014. Letter to Oregon Department of Environmental Quality, Subject: TZW Sampling - Southern PEO Barrier Wall Design. September 10, 2014.

¹ The five tribes are the Confederated Tribes of the Grand Ronde Community of Oregon, the Nez Perce Tribe, the Confederated Tribes of Siletz Indians, the Confederated Tribes of the Umatilla Indian Reservation, and the Confederated Tribes of the Warm Springs Reservation of Oregon.