



**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY
REGION 10**


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SUPERFUND &
EMERGENCY
MANAGEMENT DIVISION

MEMORANDUM

DATE: July 3, 2023

SUBJECT: Transition Zone Water Sampling Plan
Premier Edible Oils Site
ECSI #2013
May 4, 2023

FROM: Laura Hanna, RG 
Remedial Project Manager

TO: Erin McDonnell, PE
Project Manager
Oregon Department of Environmental Quality

The following are the United States Environmental Protection Agency's (EPA's) comments on the document titled *Transition Zone Water Sampling Plan*, dated May 4, 2023 and was prepared by Environmental Resources Management (ERM) for the Premier Edible Oils Site (Site). The Site is listed as DEQ ECSI # 2013 and located at 10400 North Burgard Way in Portland, Oregon. The Site is an industrial property located on the Portland Harbor waterfront along the east bank of the Willamette River at River Mile 3.5E and is a riverbank of known contamination identified in the Portland Harbor Superfund Site (PHSS) Record of Decision (ROD) (EPA 2017). The groundwater plume at the Premier Edible Oils Site is identified in ROD Figure 6 and Section 6.3.3 (EPA 2017) as a pathway of dissolved-phase contamination to the river. The Site is being addressed by Burgard, A Series of MMGL Corporation within the DEQ Voluntary Cleanup Program.

EPA understands that this sampling plan is not intended to demonstrate compliance with the source control measure remedial action objectives, it is a check-in to evaluate the transition zone water (TZW) conditions since the construction of the groundwater barrier wall and accompanying air sparge system in 2014 to 2015.

EPA's comments are presented in the following sections. Comments are categorized as "Primary," which identify concerns that must be resolved to achieve the assessment's objective; and "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, or best support the assessment's objectives. EPA comments should be addressed in the current deliverable and future deliverables.

Primary Comments

1. Sections 2 and 3 states that the 2023 TZW sampling will be performed under low river stage conditions when the hydraulic gradient toward the river is the highest each year, concurrent with groundwater sampling in August 2023. The EPA understands that the TZW sampling results will be presented in the 2023 Annual Groundwater Monitoring Report (report). A comprehensive record of existing monitoring well and river elevations are needed to document favorable hydraulic conditions are present throughout the TZW investigation. The report should include a summary of the water level data from nearby monitoring wells and river stage measured and recorded prior and during the TZW investigation.

To Be Considered Comments

1. Clarify in Section 3.4 TZW Sample Collection Procedure the purpose and intent of how the dissolved oxygen field parameter will be utilized. It is not mentioned in the initial list but then mentioned as a field parameter that will be used for comparison between surface water and TZW parameters.