UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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SUPERFUND &
EMERGENCY
MANAGEMENT DIVISION

MEMORANDUM

DATE: March 26, 2020

SUBJECT: Groundwater Source Control Measure Performance Monitoring Reports:
Quarter 4, 2018; Quarter 1, 2019; Quarter 2, 2019; Quarter 3, 2019
Premier Edible Oils Site, Portland, OR
ECSI # 2013
December 19, 2019

FROM: Benjamin Leake, PMP BJL
Remedial Project Manager

TO: Erin McDonnell, PE
Cleanup Project Engineer
Oregon Department of Environmental Quality (DEQ)

Following are the United States Environmental Protection Agency's (EPA) comments pertaining to the following documents:

- *GW SCM Quarterly Performance Monitoring Reports – Q2 and Q3, Response to Agency Comments* (RTC)
- *Quarter 4, 2018 Groundwater Source Control Measure Performance Monitoring Report* (Q4 2018 Report)
- *Quarter 1, 2019 Groundwater Source Control Measure Performance Monitoring Report* (Q1 2019 Report)
- *Quarter 2, 2019 Groundwater Source Control Measure Performance Monitoring Report* (Q2 2019 Report)
- *Quarter 3, 2019 Groundwater Source Control Measure Performance Monitoring Report* (Q3 2019 Report)

These documents were prepared for the Premier Edible Oils Site (Site) by ERM-West, Inc. (ERM) on behalf of Burgard, Series of MMGL LLC (MMGL). The scope of work for performance monitoring is prescribed by the Oregon Department of Environmental Quality (DEQ)-approved *Revised Final Performance Monitoring Plan Groundwater Source Control Measure* (ERM 2017). These documents were received by EPA on December 19, 2019.

The site is listed as DEQ ECSI # 2013 and located at 10400 North Burgard Way in Portland. 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 within the DEQ Voluntary Cleanup Program.

EPA's comments are presented in the following sections as: "Primary," which identify concerns that must be resolved to achieve the assessment's objective; "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the assessment's objectives; and "Matters of Style," which substantially or adversely affect the presentation of the technical information provided in the report.

Primary Comments

RTC

1. Per Sections 2.1.5, 2.2.2, 3.1.2, and 3.2.5 of the RTC document, groundwater cleanup levels (CULs) from Table 17 of the Portland Harbor ROD should be included in the performance criteria in all reports reviewed in this document and future performance monitoring reports. Groundwater between the GWBW and the river is an uncontrolled pathway that discharges contamination to the Willamette River. PMP Section 2.2 states that the initial performance evaluation criteria will be the Oregon Water Quality Standards and compared to top of the bank samples. However, in order to be protective of the Willamette River, and to demonstrate sufficiency of source control measures, the final PMP performance criteria must be the CULs, consistent with the ROD, whether measured at the top of the bank or at the transition zone water (TZW).

Q4 2018 Report

2. See Primary Comment 1 above.
3. Please include the calculation of vertical gradients in the report. The difference in monitoring point elevation and the difference in head needs to be clearly presented when stating vertical gradients. This comment applies to all reports reviewed in this document and future reports.
4. Figures 7 through 11 do not show isoconcentration contours on the riverward side of the GWBW. The figures should be drawn to include the entire dataset available. This comment applies to all reports reviewed in this document and future reports.
5. Please include the field logs for all monitoring events as an appendix to the report. This applies to all reports reviewed in this document and future reports.

Q1 2019 Report

6. See all applicable comments above.

Q2 2019 Report

7. See all applicable comments above.

Q3 2019 Report

8. See all applicable comments above.

To Be Considered Comments

RTC

1. Discussion of the analysis and results for polycyclic aromatic hydrocarbons (PAHs) should be included in all performance monitoring reports. Although the PAH results are presented on Table 10, the report narratives do not include any discussion on the PAH results or exceedances of the CULs. The laboratory reporting limits should be below the CULs so this comparison can be made. This comment was addressed by MMGL as 'noted' but is being retained and applies to all reports reviewed in this document and future reports.

Q4 2018 Report

2. See all applicable comments above.
3. When discussing ranges of chemicals in groundwater, it is not appropriate to use 'nondetect' as the bottom of the range. The results should be quantified by using the lowest detected concentration of each analyte as the lower number in all presentations of concentration range. This comment applies to all reports reviewed in this document and future reports.
4. The top of screen elevations relative to NAVD88 should be included in Tables 1 and 2. This information is needed to understand changes in the occurrence of LNAPL at each well relative to water elevation and well construction. This comment applies to all reports reviewed in this document and future reports.
5. For Figures 3 through 11, which show the occurrence of LNAPL, additional temporal information should be included on the legend figure. Enough detail of the date and time of LNAPL measurement should be provided to understand the relation of LNAPL occurrence at a well relative to groundwater level or river stage. For Figure 3 through 5, the legend should specify that LNAPL gauging occurred at the same data/time as the water level measurements and provide date with the symbol in the legend. For Figures 6 through 11, the figure legend should include the date observed to clarify and be more specific than only the month of the LNAPL observation. An example of the importance of this information is demonstrated in the Q3 2019 report. In this report, Figure 5 for September 2019 that shows no observed LNAPL in MW43, whereas Figures 6 through 11 for September 2019 seem to indicate LNAPL was observed in MW43. This comment applies to all reports reviewed in this document and future reports. The river hydrograph plots on Figures 3 through 5 showing water elevation and the timing of gauging that are provided in the more recent reports are a helpful addition to the LNAPL maps.

Q1 2019 Report

6. See all applicable comments above.

Q2 2019 Report

7. See all applicable comments above.

Q3 2019 Report

8. See all applicable comments above.

Matters of Style Comments

Q4 2018

1. This report contains multiple tables, figures, and appendices that should be bookmarked in the PDF of the final deliverable to assist in the review of the report. This is a comment carried forward from EPA's review of the *Quarter 3 2018 Groundwater Source Control Measure Performance Monitoring Report.*

   EPA notes that this issue was resolved in all reports starting with the *Quarter 1 2019 Groundwater Source Control Measure Performance Monitoring Report*.

References

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

ERM. 2017. *Revised Final Performance Monitoring Plan Groundwater Source Control Measure*. April 2017.