UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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SUPERFUND &
EMERGENCY
MANAGEMENT DIVISION

MEMORANDUM

DATE: May 17, 2023

SUBJECT: Semi-Annual Groundwater Source Control Measure Performance Monitoring Reports: Quarter 3 and Quarter 4, 2022
Premier Edible Oils
ECSI #2013
February 17, 2023

FROM: Laura Hanna, RG
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TO: Erin McDonnell, PE
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The following are the United States Environmental Protection Agency's (EPA's) comments on the document titled *Semi-Annual Groundwater Source Control Measure Performance Monitoring Report - Quarter 3 & 4, 2022,* dated February 17, 2023 and was prepared by Environmental Resources Management (ERM) on behalf of Premier Edible Oils Site. The Premier Edible Oils Site (Site) is listed in the Oregon Department of Environmental Quality (DEQ) Environmental Cleanup Site Information (ECSI) as ECSI #2013. 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 Measur*e (ERM 2017).

The Site is 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 expectations for this monitoring report are that it meets the requirements of the performance monitoring plan (PMP) and provide supporting information that the source control is making progress towards achieving the PHSS ROD remedial action objectives (RAOs).

The quarterly monitoring report presents the groundwater data for the Site for the third quarter (Q3) and fourth quarter (Q4) of 2022. This review was conducted with EPA's understanding that the uncontained principal threat waste (PTW-NAPL) and groundwater contamination riverward of groundwater barrier wall are to be addressed as part of the ongoing sufficiency assessment and pre-design investigations for the RM3.5E remedial design by Schnitzer Steel Industries Inc. (Burgard, A Series of MMGL Corporation) for the International Slip area.

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. EPA concurs with the recommendations in Section 6.1 to reduce the frequency of groundwater manual water level measurements from monthly to quarterly and to transition quarterly groundwater sampling to semiannual groundwater sampling in two phases. Additionally, EPA concurs with suspending NW-EPH analysis and continuing analyses by NW-VPH until C10-C12 aliphatics detections are sufficiently close to the performance evaluation criteria for decision-making regarding the operation of the GW SCM.
2. Consider adding a well group in Section 5.2.3 that includes shallow wells outside the GWBW for a discussion of the trend analysis. EPA notes that Group 1B includes the deep wells MW-26D/MW-37D, and MW-27D/MW-35D. Trend analysis for a new well group comprising the shallow wells MW-36, MW-39, and MW-43 would provide useful information for understanding the groundwater pathway from the area outside the GWBW to the Willamette River.
3. The chemical concentration maps presented in Figures 9 through 20 should be revised to denote data points outside of the barrier wall that exceed performance criteria. Although iso-contours should not be continuous across the barrier wall, the concentrations exceeding criteria should be denoted. For example, benzene and cPAHs have been detected in groundwater and transition zone water outside of the barrier wall at concentrations exceeding CULs, these data points characterize potential sources of contamination to in-water sediments and porewater.

To Be Considered Comments

1. The text in Section 5 of the report should be revised to include a discussion of the sample result exceedances of the cleanup levels (CULs) for each analyte. EPA expects that detected groundwater concentrations and the respective detection limits for each analyte are compared to the CULs for groundwater listed on Table 17 of the ROD, and not only to the GW SCM Performance Evaluation Criteria.
2. Figures showing analytical results should show where reported results exceed the PHSS CULs, where applicable.
3. The footnotes in report tables presenting analytical data should be updated to reference Errata #2 as the ROD Table 17 were modified in an errata memorandum that can be found on EPA's website: https://semspub.epa.gov/work/10/100200076.pdf. The Errata #2 Table 17 supersedes the ROD Table 17 (EPA 2017 and EPA 2020).
4. Section 1.2 describes how groundwater sampling was conducted using standard low-flow sampling equipment with disposable sampling equipment and a stainless steel submersible pump. Provide additional detail such as type of disposable equipment used (i.e., tubing) and type of submersible pump used. Describe how water quality parameters were measured and what criteria were used to determine when purging was complete before collecting the groundwater samples.
5. The report should describe how the pressure transducer data were corrected based on the calibration offsets determined during the monitoring period and reported in Table Q3-5 and Q4-5. The pressure transducer offsets for wells MW-11 and MW-41 were significant during some months. It is unclear if this is due to drift or installation error and how the data analysis in this report is impacted. The location

of the air sparging wells should be added to Figures 3 through 8 to understand the relationship between air sparging operation, changes in groundwater elevation contours, and possible contaminant migration.

6. The plots included in Attachment D should illustrate the CUL for benzene, arsenic, and manganese in addition to the GW SCM performance criteria.

References

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

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

EPA. 2020. *Memorandum re: Errata #2 for Portland Harbor Superfund Site Record of Decision ROD Table 17*. To Portland Harbor file. Office of Environmental Cleanup, USEPA Region 10, Seattle, Washington. January 14.