



Oregon

Tina Kotek, Governor

Department of Environmental Quality

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June 11, 2024

via electronic delivery

Joseph Recker, Senior Environmental Permits Coordinator
Tri-County Metropolitan Transportation District of Oregon
101 SW Main Street, Suite 700
Portland, OR 97204

RE: DEQ Review – 2024 Contaminated Media Management Plan, TriMet Columbia Operations Facility
ECSI #0121

Dear Joe Recker:

The Oregon Department of Environmental Quality (DEQ) reviewed the February 2024 *Contaminated Media Management Plan, TriMet Columbia Bus Base, Portland, Oregon* (CMMP) prepared by Parametrix for the Tri-County Metropolitan Transportation District of Oregon (TriMet). The CMMP was submitted to DEQ for review in preparation for site redevelopment activities at the Former Halton Co. facility (ECSI#0121) property.

DEQ's comments are presented below.

General Comments:

1. In general, the CMMP provides a similar or greater degree of conservatism as the earlier 2020 CMMP and incorporates new data into a larger and more comprehensive understanding of the site. DEQ views this as a positive outcome.
2. There are various editorial changes that DEQ would like to see to provide accurate and clear depictions of the data and related management actions. These are detailed in the Specific Comments section below.
3. DEQ would prefer if the term "Decision Unit" and "DU" were changed to something different. "DU" has a specific usage associated with the Incremental Sampling Method, which was not applied at the TriMet facility. Consider revising this term throughout the CMMP to avoid confusion.
4. While the Occupational RBCs are relevant for normal worker exposures at the TriMet facility, the Construction Worker and Excavation Worker RBCs are also particularly relevant screening levels to consider for characterizing risk to workers involved in redevelopment and/or maintenance and modification of utilities. Please add a screen of soil concentrations against Construction Worker and Excavation Worker RBCs in each of the tables and update the CMMP, as appropriate. These values only appear in Table 1.

Specific Comments:

1. Section 2.3:
 - a. These bullets reference DU numbers, which are somewhat unclear because of how they were assigned to sample IDs in the 2019 and 2023 sampling events. Specifically, “DU-7” and “DU-8” were reused in sample IDs between events despite the DU numbers changing to DU-15 and DU-16, respectively, in 2023. Because these DUs cover different areas, the overlap in sample ID and DU numbering is confusing. We recommend that 2023 IDs be revised to use the 2023 DU numbering (rather than, for example, trying to clarify this in table footnotes).
 - b. Bullet 7 describes the DU-9 sample from 2023 as being collected in the 2-10 ft bgs depth horizon, whereas the later Tables 1 and 2 (which come after the first Table 2 as well as Table 3 – see Specific Comment 2a) report the horizon as 4-10 ft. This is an important depth to clarify, as the Occupational RBCs are relevant to exposures to the 0-3 ft bgs soil horizon. Please clarify this wherever relevant.
2. Tables:
 - a. Table numbering starts at Table 2 and then restarts at Table 1 after Table 3, resulting in two Tables 2. Please revise the table numbering to be continuous and update all table references, as needed.
 - b. The first Table 2 provides TCLP Metals data, however no methods or discussion of these data are provided in the CMMP. Consider adding a reference to the methods and a note that EPA’s Hazardous Waste Criteria were not exceeded.
 - c. The formatting and reporting of concentration values varies from table to table, and we recommend it be made consistent. Specifically:
 - i. RBC comparisons are not included in Tables 2 and 3 but are included in the later tables (Tables 1 and second Table 2). Please include the relevant RBCs (Occupational and Construction and Excavation Workers) and screen values against them, where appropriate.
 - ii. Reporting limits are provided for non-detect values in Tables 2 and 3 but not in later tables. Please add reporting limits for all ND values, if available.
 - iii. Units are provided for all chemicals except for the Organochlorine Pesticides in the later Table 2. Please add these units (mg/kg) to the table header.
 - d. Table 1 has a typo in the heading for Indeno(1,2,3-cd)pyrene. It is written as “Ideno”. Please correct this typo.
 - e. The second Table 2 includes two footnote #1 entries. Please revise the table to use unique footnote references.
 - f. The second Table 2 includes an incorrect Occupational RBC for Dieldrin; it is reported in the table as 1.5, but it should be 0.14 mg/kg.
 - g. As requested in earlier comments, please change the sample IDs in Table 1 and the second Table 2 to reflect the 2023 DU numbering (rather than using footnotes). Please change use of “DU” to something else that doesn’t already have a specific meaning.
3. Figure 2:
 - a. Please update the location IDs for 2023 samples to reflect the 2023 numbering of DUs.

June 11, 2024

Please feel free to contact me with any questions at 503-830-4442 or at brian.church@deq.oregon.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Church', written in a cursive style.

Brian Church

Project Manager & Data Analyst
DEQ Northwest Region Cleanup Section

cc: Jason Anderson, TriMet
Erin McDonnel, DEQ
Wes Thomas, DEQ
Heidi Nelson, DEQ
Trevor Ureno, DEQ
Sarah Miller, DEQ
Project File – ECSI #0121