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July 19, 2024

Michael Watts
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via electronic delivery (email)

Re: DEQ Comments on the WR-510 and WR-306 Performance Monitoring Report for the ODOT Facility in Portland Harbor – Water Years 2022 to 2024
Portland Harbor Superfund Site Stormwater Source Control
ECSI# 5437

Dear Michael Watts:

The Oregon Department of Environmental Quality (DEQ) reviewed the *WR-510 and WR-306 Performance Monitoring Report for the ODOT Facility in Portland Harbor – Water Years 2022 and 2024*[1] (Performance Monitoring Report) prepared by Herrera Environmental Consultants, Inc. (Herrera) on behalf of Oregon Department of Transportation (ODOT). The Performance Monitoring Report presents the results of performance monitoring of two proprietary hydrodynamic separators (PHSs) conducted in water years 2022 through 2024. The two PHSs treat stormwater from within the WR-510 and WR-306 drainage basins. ODOT conducted performance monitoring of these PHSs under the *Draft Performance Monitoring Quality Assurance Project Plan*[2].

The *Portland Harbor Source Control Feasibility Study*[3] (Final FS) recommends additional source control measures for the WR-510 and WR-306 drainage basins. ODOT is currently designing a biofiltration facility downstream of the WR-510 PHS. In addition, a biofiltration swale upstream of the WR-306 PHS is planned as part of the I-5 Rose Quarter Improvement Project. Since these additional source control measures will likely improve stormwater quality from the WR-510 and WR-306 drainage basins, the effluent results presented in the Performance Monitoring Report may not represent future discharges from the ODOT facility.

Our comments below request additional information related to the performance monitoring work and results. Our comments consider comments we have received from members of the Portland Harbor technical coordination team. DEQ does not require a revised Performance Monitoring Report. Instead, we request that ODOT resolve the comments below in a comment response format.

[1] Herrera. 2023. Draft Source Control Monitoring and Analysis Work Plan, ODOT Facility in the Portland Harbor Project Area. August 14.
[2] Herrera. 201. Draft Performance Monitoring Quality Assurance Project Plan. ODOT Facility in Portland Harbor Project Area. January 7.
[3] ODOT and Herrera. 2021. 2021 Portland Harbor Source Control Feasibility Study, ODOT Facility in Portland Harbor Project Area. November 12.

General Comments

1) DEQ understands that ODOT recently replaced an older and undersized PHS in the WR-306 drainage basin. Please provide the following supplemental information:

   a) Clarify if and when ODOT retrofitted the WR-306 PHS and whether the performance monitoring results presented in the Performance Monitoring Report reflect the retrofitted PHS unit.

   b) If the performance monitoring data reflect the retrofitted PHS, briefly describe any changes in performance pre- and post-retrofit.

2) The Final FS (page 67) states "Performance monitoring is being conducted for the WR-510 and WR-306 hydrodynamic separators and the need for additional [catch basin] cleaning will be evaluated during monitoring." The Performance Monitoring Report does not evaluate the need for additional catch basin cleaning. Please indicate when ODOT plans to complete this evaluation (e.g., before or after constructing the biofiltration swale).

Specific Comments

1) **Sampling Activities, Monitoring Events**. The last sentence of this section notes the limited accessibility of the WR-306 PHS sump. Does sump accessibility affect ODOT's ability to maintain the PHS unit (e.g., removing accumulated sediments, removing trash and debris)?

2) **Results, Stormwater Sampling Results**. DEQ has the following comments:

   a) The second paragraph states that large highway drainage areas typically have finer sediment than smaller basins. Please provide a supporting citation or reference for this statement.

   b) Table 4 show that the TSS reduction rate for the WR-306 PHS was consistently below the reduction goal established by the Technology Assessment Protocol – Ecology (TAPE). Provide further discussion about why the PHS unit may be underperforming compared to the TAPE standards.

Please do not hesitate to contact me at (971) 263-8822 or Wesley.Thomas@deq.oregon.gov if you have any questions regarding this letter.

Sincerely,

Wesley A. Thomas

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