



Oregon

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July 31, 2024

Kelly Madalinski (via email to kelly.madalinski@portofportland.com)

Harbor Environmental Manager

Port of Portland

Portland, OR

Re: Comments on *Stormwater Source Control Evaluation Report - Final*

Port of Portland Terminal 4 Slip 3 Upland Facility

Cleanup Project ID No. 0272

Dear Mr. Madalinski:

The Department of Environmental Quality (DEQ) has reviewed the document entitled *Stormwater Source Control Evaluation Report – Final* (Stormwater SCE) prepared by Geosyntec Consultants (Geosyntec) on behalf of the Port of Portland (Port) for the Terminal 4 Slip 3 upland facility. The Stormwater SCE summarizes the status of source control for the stormwater pathway including source control measures and performance monitoring implemented for Basins D, J, K1 and K2 in the Slip 3 upland. DEQ provided the Stormwater SCE and DEQ's draft comments to EPA and the Tribes for the opportunity to provide input. EPA and the 5 Tribes concurred with DEQ's comments and did not provide additional comments. DEQ has the following comments on the Stormwater SCE report:

General

- 1) Please provide a table presenting the screening level values (SLVs) and the concentrations equivalent to 10X the SLVs used for comparison and referenced in the Stormwater SCE. Alternatively, the SLVs could be added to the summary tables presenting data for the stormwater and stormwater solid samples. Where detected concentrations exceeded SLVs, the range of exceedance ratios should be discussed.
- 2) For each contaminant of interest (COI), please provide information indicating from what source the SLV was obtained [e.g., Table 17 cleanup levels (CULs), joint source control strategy SLVs, or other].
- 3) In multiple sections of the Stormwater SCE, various terms are used to describe the state of selected outfalls, including “abandoned”, “decommissioned”, “plugged”, “inactive”, and “capped”. While acknowledging that more than one of these terms may concurrently apply to selected outfalls, DEQ suggests it would be helpful if the Stormwater SCE defined these terms to ensure consistency of use and facilitate better understanding for the reader.

Specific

- 4) Section 2.2.1 Drainage Basin – This section should further describe the relationship of Basin D in Slip 3 to the larger Toyota Leasehold property. Specifically, Basin D encompasses portions of both the Terminal 4 Slip 3 property and the Toyota Leasehold property, with the majority of the

basin utilized for purposes unrelated to the historic presence of a petroleum pipeline and above-ground storage tanks in the vicinity of Slip 3. The majority of Basin D is used for temporary vehicle staging, which is a low-risk industrial use. Such discussion would help put the information presented in Figures 4 and 5 in proper context.

- 5) Section 2.2.2 Outfalls – Were the accessible portions of the storm lines for Basin J and K2 also found to be competent and free from breaks during the video inspection? Please confirm.
- 6) Section 2.5.1 Basin D –
 - a. This section states that detected concentrations of Total Suspended Solids (TSS) were low and this, along with the presence of end-of-pipe treatment (i.e., Downstream Defender) installed at the remaining Basin D outfall, is cited as support that no actions to control stormwater are needed. However, an industrial stormwater curve for TSS is not provided in Appendix A. Please add this information to Appendix A or explain its omission.
 - b. For contaminants in stormwater discussed in subsections A.2 through A.6 which exceed SLVs, please discuss the range of exceedance ratios.
- 7) Section 2.5.2 Basins J and K2 –
 - a. Please add language indicating that specific supporting information regarding observations of no flow is provided in Sections 6.2 and 6.3 of the Stormwater SCE.
 - b. DEQ notes that in Figure 10, it appears there is a dark colored area (possible staining?) on the trunk of the tree adjacent to the capped K2 outfall. Has the possibility that this represents fluids dripping from the capped outfall been investigated and/or ruled out? Please clarify.
- 8) Section 3.2 Outfall Sediment Data – The purpose of the Sufficiency Assessment is to identify not only remedial action level (RAL) or principal threat waste (PTW) exceedances that could pose a recontamination risk, but also CUL exceedances that could impair long-term attainment of the Remedial Action Objectives (RAOs) for the in-water cleanup. Therefore, the discussion regarding exceedances in riverbank soils near the Basin D and K1 outfalls should also include CUL exceedances and their magnitude. Please clarify the context and timeframe for the “remedial design”.
- 9) Section 4 Ongoing Stormwater Management Measures and Section 6.4 Basin K1 - The vegetation around the bio infiltration basin in K1 shown in Figure 9 appears to be extremely sparse in the photo; has the vegetation thickened around the sides and base of this basin and has any evidence of clogging and/or erosion/rills along any of the basin sidewalls been observed? Please clarify.
- 10) Section 6.2 Basin J –
 - a. Please provide discussion regarding why additional investigations that ultimately discovered a remaining catch basin in Basin J were performed subsequent to the 2021 Stormwater Evaluation Report. Based on discussion provided, however, DEQ infers that ponding events were observed although no information regarding the frequency of occurrence, duration of ponding, or depth of ponding is provided. Please clarify. Comment also applies to Section 6.3.
 - b. Please provide specific information regarding the dates in 2020 during which flow was not observed during significant precipitation events and forms the basis for the Port’s conclusion that the outfalls for these basins do not discharge. Comment also applies to Section 6.3.

- c. Please highlight on Figure 2 the locations of the additional catch basins identified and decommissioned or plugged in Basins J (May 2023) and K2 (August 2021), respectively.
- 11) Section 7.1.1 Basin D – The first sentence should indicate the five minor outfalls are abandoned and not only capped.
 - 12) Section 7.1.2 Basin K2 and J – The first sentence is misleading as the conveyance pipes connected to the Basins K2 and J catch basins remain in place. Please correct this text to indicate the outfalls are inactive.
 - 13) Section 7.2 Other Lines of Evidence – The existence of the MS4 permit held by the Port and 1200-Z permits held by tenants including Toyota and Kinder Morgan alone do not constitute sufficient other lines of evidence that the stormwater pathway has been controlled. This section should cite the continued operation of the Basin K1 infiltration basin and Basin D end-of-pipe treatment, observations of the capped outfalls for Basins J and K2, and lack of change in land use as LOEs that the stormwater pathway will continue to be controlled. The continued implementation of best management practices (e.g., sweeping) should also be included in this section.
 - 14) Section 8 Findings and Conclusions – Under number 2, please revise the second bullet to accurately reflect that stormwater from Basin K1 is controlled with an infiltration basin, not an end-of-pipe treatment SCM.
 - 15) Figure 2. Are all minor outfalls in Basin D abandoned, or are some only capped at the end of pipe? Please clarify and update the figure as necessary to make this difference clear.
 - 16) Figure 3. Please add labels to outfalls shown (e.g., STSOUT262).
 - 17) Figure 7. Several sections of the report indicate the minor outfalls in Basin D are capped. Some sections indicate the upland catch basins were decommissioned and/or abandoned. For the outfalls that are shown to be capped, how were the upland catch basins and piping decommissioned?

DEQ appreciates the diligence of the Port in investigating and addressing stormwater source control issues at Terminal 4 Slip 3. Furthermore, DEQ agrees with the conclusions of the Stormwater SCE that facility-related sources of contamination to stormwater have been adequately controlled. LNAPL removal and groundwater monitoring is currently ongoing at Slip 3 in accordance with the upland Record of Decision. Please prepare a Response to Comment and revised Stormwater SCE. The purpose of the clarifications and edits requested is to strengthen the arguments that the stormwater pathway at Terminal 4 Slip 3 does not pose a risk of recontamination to the in-water remedy.

If you have questions or want to discuss further, please contact me by phone at (503) 863-0810 or email (jeff.schatz@deq.oregon.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff K. Schatz", with a long horizontal flourish extending to the right.

Jeff K. Schatz, R.G.
Project Manager
Northwest Region Cleanup Program

cc: Laura Hanna, Remedial Project Manager, EPA Region 10
Josie Clark, Remedial Project Manager, EPA Region 10
Brook Harmon, P.E., Project Engineer, MFA
Heidi Nelson, Environmental Engineer, DEQ
David Lacey, Source Control Coordinator, DEQ

(jks:JKS)