REGION 10
SEATTLE, WA 98101

May 3, 2024

MEMORANDUM

SUBJECT: Comments on the Source Control Evaluation Work Plan
Baxter and Fleming Industries, Portland, Oregon
ECSI # 26565
January 16, 2023

FROM: Laura Hanna, RG, Remedial Project Manager
Superfund and Emergency Management Division, EPA

TO: Jim Orr, RG, Project Manager
NWR Cleanup, Oregon Department of Environmental Quality

The following are the U.S. Environmental Protection Agency's (EPA's) comments on the document titled *Source Control Evaluation Work Plan* (Work Plan) focuses on the stormwater upland source contaminant transport pathway. The Work Plan was prepared by AEI Consultants (AEI) on behalf of Norris & Stevens. The Site is occupied by Baxter & Flaming Industries, Inc., located at 3717 NW Saint Helens Road in Portland, Oregon, and is listed as Environmental Cleanup Site Information (ECSI) #6565. The site is located approximately 3,100 feet from the Willamette River upland of the River Mile 9 West (RM9W) remedial design project area within the Portland Harbor Superfund Site (PHSS). Stormwater from the Site discharges to RM9W via City of Portland Outfall 18.

EPA understands the primary objectives of the Work Plan are to describe the procedures that will be used to collect stormwater samples and evaluate potential contaminants of concern in stormwater at the Site that are discharging to the storm drain network, which could impact the Willamette River. EPA's comments are categorized as "Primary," which identify concerns that must be resolved to achieve the objective; "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the objectives; and "Matters of Style," which substantially or adversely affect the presentation of the technical information provided in the report.

Primary Comments

1. Include further detail regarding how and where samples are planned to be collected. The Work Plan states "Care will be taken to ensure that only water collected directly from the compliance sampling point out-flow will be captured." Elaborate on the location of the compliance sampling point out-flow, including clarification on if samples will be collected from a stormwater manhole or catch basin.

2. Sample results should be compared to PHSS Record of Decision (ROD) cleanup levels (CULs; EPA, 2017) instead of, or in addition to, Joint Source Control Strategy (JSCS) screening level values (SLVs; DEQ and EPA 2025) or Occupational Risk-Based Concentrations. Section 7.6 and Table 3 should be revised to allow for comparison of method detection limits (MDLs) and method reporting limits (MRLs) to ROD CULs. The ROD CULs superseded the SLVs when the ROD was published in 2017, and data collected during the source control evaluation should be compared to ROD CULs.

3. Include all metals that have ROD surface water CULs in the analyte list for stormwater sampling. Various current and historical operations involved the use of metals, and some metals (e.g., copper and zinc) are common stormwater contaminants associated with building materials. The rationale that is provided in Table 3 is not sufficient for excluding these analytes.

To Be Considered

1. All site operations and stormwater runoff should be evaluated as part of source control evaluations, regardless of who is conducting the operations at the site. Section 2.1 mentions that the truck storage is not associated with Baxter & Flaming, however text should clarify that the stormwater from that portion of the site is still included in the proposed stormwater evaluation described in the Work Plan.

2. If available, include information on the site stormwater conveyance system. The text and figures do not currently discuss the layout of stormwater piping.

3. Revise Section 6.0 to include an evaluation of the preferential flow pathway from the capped catch basins. Section 2.1 indicates that there are at least three interior catch basins present onsite that were capped with concrete and that these features can act as potential preferential pathways for contamination. Additionally, Section 4.0 indicates that AEI recommended further subsurface assessment in connection with apparent releases from these catch basins. These catch basins remain a potential ongoing source at the site and a plan should be developed to evaluate them.

4. Remove the text in Section 7.1 indicating that a sample from RDG-1 will be used as a background sample. A sample from a rain gutter is not necessarily representative of background due to contaminants that could be present in roofing or gutter materials.

5. Field quality assurance (QA) and quality control (QC) should be described in the Work Plan in addition to the laboratory QA/QC that is described in Section 7.7. Field QA/QC should include a rinsate blank for the stainless-steel cup and field duplicate sample. The rinsate sample should be collected after the equipment has been decontaminated to assess potential for cross-contamination from sampling equipment.

Matters of Style

1. Revise the text in Section 7.2 to state “first flush” conditions instead of just “flush”.

2. Revise 1,2-Dichlorophenoxyacetic acid to 2,4-Dichlorophenoxyacetic acid in Table 3 to match the contaminant included in PHSS ROD Table 17.

3. Revise Table 3 to only list Xylenes and Zinc once. These contaminants are listed twice and the information in the columns to the right is different for Xylenes in each of the rows.

References

DEQ and EPA. 2005. Portland Harbor Joint Source Control Strategy. December.

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

cc: David Lacey, DEQ
Josie Clark, EPA
Katie Young, CDM Smith