Oregon
Tina Kotek, Governor

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September 8, 2024

Kelly Madalinski (via email to kelly.madalinski@portofportland.com)
Harbor Environmental Manager
Port of Portland
Portland, OR

Re: DEQ Comments on *Final Stormwater Source Control Evaluation Report*
Port of Portland Terminal 4 Slip 1 Upland Facility
Cleanup Project ID No. 2356

Dear Mr. Madalinski:

The Department of Environmental Quality (DEQ) has reviewed the document entitled *Final Stormwater Source Control Evaluation Report* (Stormwater SCE) prepared June 2024 by Geosyntec Consultants (Geosyntec) on behalf of the Port of Portland (Port) for the Terminal 4 Slip 1 upland facility. The Stormwater SCE summarizes the status of source control for the stormwater pathway, as well as sampling, source control measures (SCMs) and performance verification monitoring performed for selected Slip 1 stormwater basins. DEQ provided the Stormwater SCE and DEQ's draft comments to EPA and the Tribes for the opportunity to provide input. EPA and the Five Tribes provided feedback that was incorporated into DEQ's comments. DEQ has the following comments on the Stormwater SCE report:

General Comments

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, these values could be added to the summary tables presenting data for the stormwater samples.

2) Please revise the Stormwater SCE to include stormwater data for all Slip 1 basins collected during the period of 2020 to 2024 (i.e., basins N, O and P). Having all of the recent stormwater data in a single document will facilitate preparation (and review) of the future source control decision. The Port can add the 2020 to 2022 data to existing tables in the Stormwater SCE or add the data as separate tables. In addition to the Joint Source Control Strategy SLVs (General Comment 1), please also add the Portland Harbor Record of Decision Table 17 cleanup levels (CULs) to the tables for screening.

3) Where detected concentrations of contaminants of interest (COI) in stormwater exceeded SLVs, the range of exceedance ratios should be discussed. DEQ acknowledges this information is provided for 2023-2024 stormwater data for basins O and S in Section

5.3.2 and associated subsections; please also provide this information for the 2020 to 2022 stormwater data presented in the December 2022 *Stormwater Evaluation Report* (see General Comment 2).

4) Additional data evaluation should be provided for the dioxin/furan stormwater samples data to strengthen the conclusion that the site is not a source of dioxins/furans to sediment in the Terminal 4 Project Area. To support this conclusion please include additional lines of evidence, such as comparing the stormwater results to the now-available rank order charts presented in Appendix E: Tool for Evaluating Stormwater Data[1], and comparing dioxin/furan congeners detected in stormwater to the dioxin/furan congeners detected in sediment adjacent to the outfall. DEQ's Guidance for Evaluating the Stormwater Pathway at Upland Sites and supporting information can be found at the following website (https://www.oregon.gov/deq/hazards-and-cleanup/env-cleanup/pages/stormwater-guidance.aspx).

5) The specific ongoing O&M requirements should be summarized for each basin where applicable. For example, that would include vegetation management at Basin M and periodic vacuuming for permeable pavement maintenance at Basins M, N and O, etc., for the purpose of maintaining the stormwater quality into the future. In addition, the basins that are covered under the MS4 permit and the ongoing non-structural BMP requirements should be identified.

Specific Comments

6) Section 2.1 Site Description. Berth 401 is described in this section as a water-related area. Please label this feature on at least Figure 2

7) Section 2.2.2 Outfalls. This section states that trench drains in Basin N were found to drain to the sanitary sewer. Please add this information to Figure 3, which shows other areas of the Slip 1 upland that drain to sanitary.

8) Section 2.5.2.1 Historical Uses. Please revise this section to identify the fumigation chemicals used at Slip 1 (i.e., if known).

9) Section 2.5.2.2. Please add the range of arsenic in the regional groundwater that is included in the reference in this section.

10) Section 2.5.3 Basin N. Please add discussion to this section indicating if video inspection of the storm sewer lines showed them to be competent and free from breaks. Comment also applies to Sections 2.5.4, 2.5.5, and 2.5.8.

[1] DEQ. 2024. Appendix E: Tool for Evaluating Stormwater Data. [Guidance for Evaluating the Stormwater Pathway at Upland Sites]. Oregon Department of Environmental Quality. July 2024. (https://www.oregon.gov/deq/FilterDocs/cu-stormwatersitesAppE.pdf)

11) Section 2.5.4 Basin O. Please provide additional information regarding the contents of the liquid pipeline installed in 2010. Comment also applies to Section 2.5.7.

12) Section 3.1 Potential Contaminant Sources. In addition to near-surface soils in Basins R and S containing PAHs identified as historical sources, please also include discussion of specific areas where pencil pitch is likely still present as residuals in the site soil (i.e., Basin L) and/or in the Slip 1 riverbank.

13) Section 3.2 Outfall Sediment Data. In addition to Figure 4, the Stormwater SCE should include a figure showing the current bank conditions and the potentially erodible segments referenced in this section (e.g., Figure 3 Riverbank Physical Characterization Summary from the in-water December 2021 Riverbank Characterization Report or similar figure).

14) Section 5.3.3 Dioxins and Furans. To supplement the discussion in this section, the Port should evaluate, as an additional line of evidence, the dioxin/furan congener data using industrial stormwater curves developed by DEQ for Portland Harbor (see General Comment 4).

15) Section 6.1 Basin L. DEQ was made aware of precipitates on the filter bed of the StormwateRx Aquip treatment system during performance verification monitoring. Please add a brief discussion about addressing the precipitates going forward.

16) Section 7.1.5 Basin P. This section erroneously references Basin N. Please revise to reference Basin P consistent with the name of the subsection.

17) Section 7.2. Other Lines of Evidence. The additional basins that require ongoing O&M should be included in this paragraph, for instance the permeable pavement maintenance requirements for Basins M, N and O.

18) Figure 7 Terminal 4 Slip 1 Upland Facility Current Basin Status.
    a. This figure shows several areas as “No Action Needed”. However, DEQ notes this description is oversimplified because routine BMPs should be implemented across the site to help ensure stormwater quality is maintained. Suggest revising the description of these areas to reflect the need for continued BMP implementation.
    b. Are the areas shown in green part of the Port’s MS4 permit? Please confirm.

DEQ appreciates the diligence of the Port in investigating and addressing stormwater source control issues at Terminal 4 Slip 1. Furthermore, DEQ agrees with the conclusions of the Stormwater SCE that facility-related sources of contamination to stormwater have been adequately controlled and will remain controlled with ongoing O&M per the DEQ-approved plan (i.e., Basin M) and future BMP requirements at this facility. Please prepare a Response to Comment and revised Final Stormwater SCE for DEQ review for approval. Please also provide a red-line strike-out version of the revised Stormwater SCE to facilitate DEQ’s review. The

clarifications and edits requested are intended to strengthen the arguments that the stormwater pathway at Terminal 4 Slip 1 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,

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

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(jks:JKS)