REGION 10
SEATTLE, WA 98101

May 9, 2024

MEMORANDUM

SUBJECT: Comments on the Draft Storm Water Source Control Evaluation with Source Control Measurement Performance Monitoring
Lampros Steel, Portland, Oregon
ECSI # 2441
August 28, 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 *Storm Water Source Control Evaluation with Source Control Measures Performance Monitoring* (SCE Report), dated August 28, 2023. This document was prepared by EVREN Northwest, Inc. for Johnson-Lampros Warehouse LLC. The Lampros Steel Facility (hereinafter referred to as the site) is located at 9040 N Burgard Way, Portland, Oregon, is listed as Environmental Cleanup Site Information (ECSI) #2441 and is upland of the River Mile 3.5 East (RM3.5E) project area of the Portland Harbor Superfund Site (PHSS). Stormwater from the site discharges to the International Slip through Outfall 18 (WR-123) approximately 600 feet to the west of the site.

EPA's comments are categorized as "Primary", which identify concerns that must be resolved to achieve the objective; and "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the objectives.

Primary Comments

1. Stormwater data presented in the SCE Report suggest that additional source control measures (SCMs), performance monitoring, and/or best management practices (BMPs) are needed to control discharge of contaminants to the Willamette River. As described in the SCE Report, several contaminants of concern (COCs) for PHSS (polychlorinated biphenyls [PCBs], polycyclic aromatic hydrocarbons [PAHs], , arsenic, manganese, and copper) were detected in one or

more stormwater samples at concentrations that exceeded screening level values. Notably, detected arsenic concentrations fall amongst the highest values on the rank-order curve during two storm events. In addition, several COCs (PAHs, arsenic, manganese, and total suspended solids [TSS]) were observed with higher concentrations during post-SCM sampling (2022 to 2023) compared to pre-SCM sampling conducted in 2018. These lines of evidence suggest that contaminant sources have not been adequately controlled at the site.

To Be Considered

1. Stormwater monitoring results presented in the SCE Report should be compared to surface water cleanup levels from Table 17 of the ROD in addition to rank-order curves and screening level values.

2. Additional discussion should be provided regarding the suitability of the storm sampling events for comparing to other Portland Harbor industrial facilities and making conclusions on source control. The stormwater sampling guidance provided in Appendix D of the Portland Harbor Joint Source Control Strategy (JSCS; DEQ and EPA 2005) recommends a minimum antecedent dry period of 24 hours, a precipitation volume of greater than 0.2 inches, and sampling during the first 3 hours of runoff to the extent practicable for two storms and during the first 30 minutes (i.e., "first flush") for two other storms. The storms sampled did not fully comply with these guidelines, particularly during Storm Event #2 (December 9, 2022) and Storm Event #3 (January 13, 2023), when samples were collected approximately 12 hours after the start of rainfall. Because these storms were not sampled using the same protocols as other JSCS sampling, concentrations may not be directly comparable to other sample concentrations used to develop rank-order curves. This is particularly noteworthy for arsenic, which had much lower concentrations during Storm Events #2 and #3.

3. The capacity of the treatment system and frequency of overflow bypass should be described in the SCE Report. This should include information on design flow rates, design storm events, and estimated percentage of stormwater runoff being captured and treated by the system on an annual basis. Any samples collected during overflow events should be identified and discussed to inform potential water quality impacts during high flow conditions.

4. Additional data evaluation should be provided for the dioxin/furan sample results to support the conclusion that the site is not a source of dioxins/furans to sediment in the RM3.5E project area. The text in Section 8 acknowledges the 2,3,7,8-TCDD eq concentration detected exceeds the screening level value from one to three orders of magnitude but indicates that the site is an unlikely source of dioxins/furans because of facility operational activities. Additional lines of evidence should be included to evaluate the sample results, such as comparing the dioxin/furan congeners that were detected in stormwater to the congeners in sediment adjacent to the outfall or comparing data to available in-water or end-of-pipe dioxin/furan sampling results.

5. Verify the location of the outfall (APC216) shown in Figure 4 Storm Water Conveyance Map (Distal) is correct and update the figure and text, as needed. EPA believes Figure 4 is mislabeled and incorrectly shows the location of APC216, which is also known as Outfall 18/WR-123. EPA believes Figures 4 actually shows the location of Outfall 19/WR-124. Below is an excerpt of

Figure 1.2 Project Area from River Mile 3.5 East Remedial Design Pre-Design Investigation Work Plan (Floyd Snider 2022) for comparison.

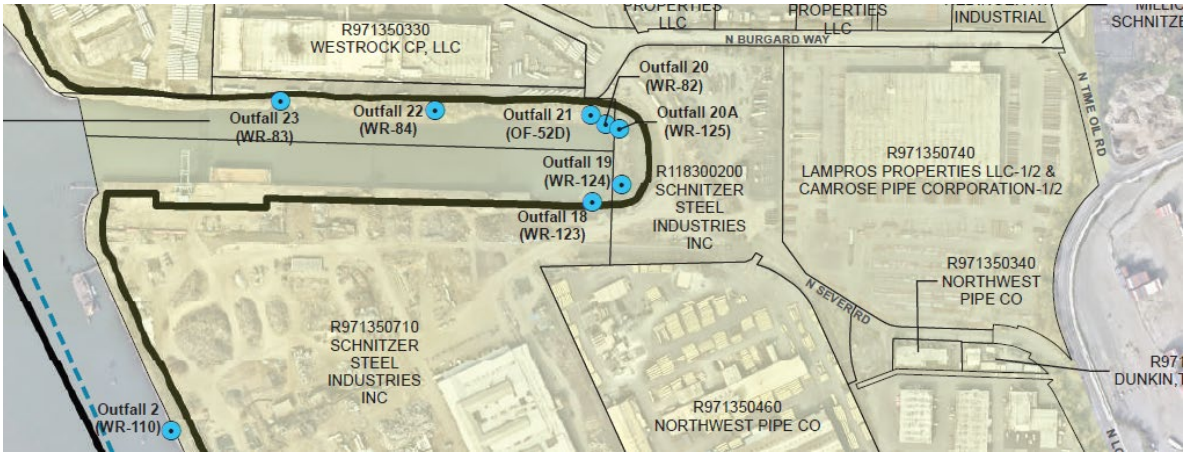

Figure 1. River Mile 3.5 East Project Area and associated Outfalls

References

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

Floyd Snider. 2022. River Mile 3.5 East Remedial Design Pre-Design Investigation Work Plan. Prepared for Schnitzer Steel Industries, Inc. August 2021. Updated August 2023. Final.

cc: David Lacey, DEQ
Rich Francis, EPA
Katie Young, CDM Smith