From:	Jennifer Hart
To:	SCHATZ Jeff * DEQ
Cc:	Gail Fricano; Peter Shanahan
Subject:	RE: Annual 2023 Groundwater Monitoring and LNAPL Removal Report for Terminal 4 Slip 3 Upland (ECSI 0272) and Draft DEQ Comments
Date:	Wednesday, March 13, 2024 6:58:31 AM

Hello Jeff,
Thank you for providing an opportunity to review the *Annual 2023 Groundwater Monitoring and LNAPL Removal Report* for the Terminal 4 Slip 3 upland site and DEQ's draft comments. DEQ's draft letter is comprehensive, and we do not have any substantive comments to add; however, we did note a few potential inconsistencies in the report that might be worth clarifying.

On page 11, the report states that LNAPL monitoring and removal was performed on four wells (MW-19, MW-20, HC-10, BE-4) in December 2023. Table 1 lists discrete removal volumes for MW-19, MW-20, and BE-4 in December, but no volume is reported for HC-10. Table 1 also includes monitoring data for a different subset of wells for a June 2023 event. Further, Table 2's notes indicate that HC-5 was included in the 2023 LNAPL recovery program. Thus, there seems to be a disconnect between the report's text and tables as to whether LNAPL monitoring and removal occurred at various wells in June and December 2023.

Thanks,
Jennifer

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Subject: Annual 2023 Groundwater Monitoring and LNAPL Removal Report for Terminal 4 Slip 3 Upland (ECSI 0272) and Draft DEQ Comments

Note: This email originated outside of IEc. Be cautious with any links or attachments.

Greetings-

The Department of Environmental Quality (DEQ) is forwarding the attached report titled *Annual 2023 Groundwater Monitoring and LNAPL Removal Report* for the Terminal 4 Slip 3 upland facility, which was prepared by Apex on behalf of the Port of Portland, along with DEQ's draft comments. The annual monitoring report for Slip 3 documents ongoing LNAPL removal and groundwater sampling performed in accordance with the upland Record of Decision and in support of Portland Harbor source control. DEQ is submitting this support document for source control as a courtesy and is not requesting formal input from EPA or the Tribes.

Despite meeting the requirements to suspend LNAPL removal, the Port is voluntarily continuing those activities on an annual basis. It is hoped that the pending porewater data collected form Slip 3 as part of the in-water Supplemental PDI will help inform conclusions regarding source control.

If you wish to provide feedback, please do so by March 21, 2024. Regards,

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