From:	Hanna, Laura (she/her/hers)
To:	SCHATZ Jeff * DEQ
Cc:	LACEY David J * DEQ; Clark, Josie; Young, Katie I.
Subject:	RE: Stormwater Source Control Evaluation for Terminal 4 Slip 3 (0272) and DEQ Draft Comments
Date:	Monday, July 29, 2024 2:34:48 PM
Attachments:	NWDCER_272__DEQ Comments_Stormwater Sampling Report_Slip 3_20210623.pdf

Hi Jeff,

Thank you for the couple extra days to review. EPA does not have any comments on the *Final Stormwater SCE Report,* dated April 2024 for Terminal 4 Slip 3. EPA agrees with DEQ's comment set dated 7/9/2024; it is comprehensive. In particular, Specific Comment 8 is relevant to the in-water project and the discussion request regarding exceedances in riverbank soils near the Basin D and K1 outfalls should also include CUL exceedances and their magnitude which EPA appreciates.

To round out EPA's record, can you please confirm that DEQ believes DEQ's final comment set, dated 6/23/2021 (attached for reference) on the *Stormwater Evaluation Report* for Terminal 4 Slip 3 (basins K1, K2, J and D), dated May 2021 have been adequately addressed in this April 2024 document? Thank you.

Laura Hanna, RG
Remedial Project Manager
EPA Region 10, Oregon Operations Office
O: 503-326-3689

From: SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Sent: Tuesday, July 9, 2024 6:53 AM
To: Clark, Josie <Clark.Josie@epa.gov>; Hanna, Laura (she/her/hers) <Hanna.Laura@epa.gov>; Jennifer Hart <jhart@indecon.com>; shil@yakamafish-nsn.gov; Gail Fricano <GFricano@indecon.com>; susan.spalinger@alta-se.com; Jon Munkers <jon.munkers@alta-se.com>
Cc: LACEY David J * DEQ <David.J.LACEY@deq.oregon.gov>; NELSON Heidi * DEQ <Heidi.NELSON@deq.oregon.gov>
Subject: Stormwater Source Control Evaluation for Terminal 4 Slip 3 (0272) and DEQ Draft Comments

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Greetings-

The Department of Environmental Quality (DEQ) is forwarding the attached report titled *Stormwater Source Control Evaluation Report – Final Update* (Stormwater SCE) for the Terminal 4 Slip 3 upland facility, which was prepared by Geosyntec Consultants (Geosyntec) on behalf of the Port of Portland (Port). In addition, DEQ's draft comments on the Stormwater SCE are provided (see attached). The Stormwater SCE documents source control measures

(SCMs), observations, and sampling in selected basins bordering Slip 3 in accordance with DEQ guidance for evaluating the stormwater pathway at upland sites. In addition, information and findings from previous (pre-2020) reports are included, where relevant, to support determinations regarding the status of stormwater source control for selected basins.

DEQ is requesting that the Port prepare a Response to Comment and a revised Stormwater SCE report.

Notwithstanding these comments, DEQ agrees with the findings of the Stormwater SCE that sources of facility-related contamination via the stormwater pathway are adequately controlled, and additional source control measures are not needed. Performance monitoring for the Basin K1 infiltration basin will continue through 2026, although the findings of the Year 2 Comprehensive Report indicate the SCM is operating as designed.

DEQ is requesting that the TCT provide comments on the Stormwater SCE by close of business on Thursday July 25, 2024. Please contact me if you have any questions.

Respectfully,

Jeff K. Schatz, R.G.
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