From:	SCHATZ Jeff * DEQ
To:	Madalinski, Kelly
Cc:	NELSON Heidi * DEQ; LACEY David J * DEQ; Marc Leisenring; Ariel Mosbrucker
Subject:	Responsiveness Survey - Revised Stormwater Evaluation Report, Terminal 4 Slip 3 (0272)
Date:	Friday, September 20, 2024 8:15:00 AM
Attachments:	image001.png

Kelly-

Good morning and best wishes for a great Friday. DEQ has reviewed the revised Stormwater SCE and Response to Comment prepared by Geosyntec on behalf of the Port of Portland for Terminal 4 Slip 3. DEQ finds the responses and revisions to be acceptable, with one clarification:

- DEQ appreciates the inclusion of the table with JSCS SLVs and values equivalent to 10X SLVs in the revised Stormwater SCE. My apologies if General Comment 1 was not entirely clear regarding DEQ's intent, although General Comment 2 was meant to clarify that intent. In using the generic term "SLVs", DEQ was referring to the appropriate screening level for stormwater, whatever the source. While DEQ acknowledges that screening stormwater against the surface water CULs in the Portland Harbor ROD Table 17 is conservative, it is standard practice in Source Control that where Table 17 CULs have been established for site COIs, they supersede the JSCS SLVs. If there is no Table 17 CUL for a site-specific COI in stormwater, it's acceptable to use the corresponding JSCS SLV. Taken together, the intent of the General Comments was to request a table of SLVs consisting of either Table 17 CULs or JSCS SLVs as appropriate, along with the value equivalent to 10X that value.

DEQ is <u>not</u> requiring additional revisions to the Stormwater SCE or RTC and the (revised) Stormwater SCE for Slip 3 is approved.

Having said that, DEQ believes that a revised table along the lines of that described in the bulleted item above will be immensely helpful to DEQ as a future Source Control Decision is prepared for Slip 3 (and also Slip 1). DEQ recommends that the Port consider creating this table, although it does not need to be incorporated into the Stormwater SCE.

Please contact me if you have questions or wish to discuss this point further. Respectfully,

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From: Madalinski, Kelly <Kelly.Madalinski@portofportland.com>
Sent: Tuesday, September 10, 2024 9:50 AM
To: SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Ariel Mosbrucker <AMosbrucker@Geosyntec.com>; Marc Leisenring <mleisenring@geosyntec.com>
Subject: Revised Stormwater Evaluation Report, Terminal 4 Slip 3 (ECSI #272)

Hi Jeff,

Please find the following attached deliverables:

- Revised *Stormwater Source Control Evaluation Report* for the Terminal 4 Slip 3 site (ECSI #272)
- Response to comment matrix
- Redline-strikeout of the attached revised report

The attachments provide the information on the revisions of the report based on the July 31, 2024 DEQ comments to the initial May 3, 2024 report submittal.

The objective of the report is to demonstrate that existing and potential sources of contamination at the site have been addressed and no additional characterization or source control measures (SCMs) are needed at the site, as outlined in DEQ's 2009 guidance for evaluating the stormwater pathway at upland sites. The conclusion of this report is that these objectives have been met and the next step is a source control determination for the stormwater pathway at this site.

Feel free to follow-up with any questions.

Thanks!
Kelly

Port of Portland

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