



# Oregon

Kate Brown, Governor

## Department of Environmental Quality

Northwest Region

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TTY 711

November 3, 2021

Michael A. Kaplan, SVP  
HDNGR NW Industrial LLC  
1750 NW Front Ave. #106  
Portland, Oregon 97209

**RE: Workplan for Stormwater Source Control Evaluation, Intrepid Marble and Granite,  
4000 NW St. Helens Road, Portland, Oregon 97210. ECSI #6148**

Dear Mr. Kaplan,

The Oregon Department of Environmental Quality (DEQ) has reviewed the document entitled *Workplan for Stormwater Source Control Evaluation*, dated October 11, 2021. This October 11, 2021 *Workplan* was prepared on your behalf by EVREN Northwest, Inc. and is a revision of previous Workplans for Stormwater Source Control Evaluation prepared in response to DEQ comments. See the Project References list at the end of this letter.

DEQ approves this *Workplan* with the following considerations to be addressed in a brief Workplan Addendum letter to be submitted to DEQ within 30 days of this correspondence.

- Section 3.2 Outfall Sediment Data. DEQ's 2016 Portland Harbor Upland Source Control Summary Report identified the following COIs associated with Areas of Potential Concern (AOPC) 18, which is adjacent to the City of Portland outfall OF19:
  - Aluminium, barium, cadmium, copper, iron, manganese, mercury, silver, zinc, PCBs, PAHs, delta-HCCH, dieldrin, endrin, and chloroethane.Additionally, the Revised Draft Report Sufficiency Assessment Report River Mile 9 West identified the following Portland Harbor COCs were identified as RM 9W RPCs.
  - Total PCBs, dioxin/furans, Aldrin, dieldrin, DDX, total chlordane, arsenic cadmium, mercury, TPH-Dx, and bis(2-ethylhexyl)phthalate.Please revise this section to include this information.
- Section 3.4 Contaminants of interest. Please revise the work plan to include a rationale for excluding any Portland Harbor surface water and/or sediment COCs presented on Table 17 of the PH ROD.
- Provide DEQ with a schedule for PerkFilter Stormwater filtration system installation.
- Engineering plans for the PerkFilter Stormwater filtration system (Drawing No. 1) indicate that the stormwater pipes leading to the PerkFilter will be flushed and cleaned as part of PerkFilter installation. Please describe how this cleanout work will be accomplished and how material removed from stormwater pipes will be characterized and disposed of.

- Section 5.1.3 Storm Event Criteria. Stormwater sampling should be done in accordance with DEQ's Guidance for Evaluating the Stormwater Pathway at Upland Sites. Significant deviation from this guidance may result in an inadequate data set and the necessity for additional sampling. This property is not in the NPDES program and NPDES 1200Z protocols are not relevant.

If you have any questions, please contact me.

Sincerely,



Kenneth Thiessen, CEG  
Northwest Region Cleanup Section

**Project References:**

EVREN Northwest, Inc. March 16, 2021. Intrepid Marble and Granite Workplan for Stormwater Source Control Evaluation. 4000 NW St. Helens Road, Portland, Oregon. ECSI #6148

Oregon DEQ, April 14, 2021 (updated). Intrepid Marble and Granite Workplan for Stormwater Source Control Evaluation, 4000 NW St. Helens Road, Portland, Oregon. ECSI #6148

EVREN Northwest, Inc. April 24, 2021. Workplan for Stormwater Source Control Evaluation. 4000 NW St. Helens Road, Portland, Oregon. ECSI #6148

Oregon DEQ, August 24, 2021. Intrepid Marble and Granite Workplan for Stormwater Source Control Evaluation, 4000 NW St. Helens Road, Portland, Oregon. ECSI #6148

EVREN Northwest, Inc. October 11, 2021. Response to ODEQ comments for April 14, 2021, Workplan for Stormwater Source Control Evaluation, 4000 NW St. Helens Road, Portland, Oregon (ECSI #6148).

cc: Lynn Green, CEG, EVREN Northwest, Inc.  
Victoria Bennett, EVREN Northwest, Inc.  
Benjamin Leake, EPA  
Dave Lacey, DEQ NWR  
ECSI #6148