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October 11, 2024

SENT VIA EMAIL
Ms. Rebecca Digiustino
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland Oregon 97232-4100

Subject: **Response to DEQ Acceptance of Revised Stormwater Source Control Measures Report Addendum and Updated Stormwater Source Control Evaluation**
Former Gunderson LLC Facility
4350 NW Front Avenue, Portland, Oregon 97210

Dear Ms. Digiustino,

This letter provides the Gunderson LLC (Gunderson) response to the September 11, 2024 Oregon Department of Environmental Quality (DEQ) letter providing comments on Gunderson's *Revised Stormwater Source Control Measures Report Addendum and Updated Stormwater Source Control Evaluation* (SCE Addendum) submitted on June 20, 2024 by GeoEngineers, Incorporated (GeoEngineers) on behalf of Gunderson for the above-referenced facility (the Site). An August 30, 2024 US Environmental Protection Agency (EPA) Memorandum on the SCE Addendum was included as an attachment to the DEQ letter.

Stormwater Source Control Evaluation Status

In the September 11, 2024 letter, DEQ stated that *"DEQ accepts the SCE Addendum and Greenbrier may cease the current stormwater source control monitoring program*." However, DEQ also requires Gunderson to address EPA's comment that dioxins and furans should be evaluated before a source control decision can be made.

We appreciate that DEQ has approved discontinuation of the Gunderson stormwater source control performance monitoring program at the Site. The source control performance monitoring program most recently included four outfalls at the Site (WR-127, WR-135, WR-136, and WR-141) sampled four times annually for the following analytes: metals (arsenic, cadmium, copper, zinc), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), bis(2 ethylhexyl)phthalate (BEHP), dichlorodiphenyldichloroethane, dichlorodiphenyldichloroethylene, dichlorodiphenyltrichloroethane (DDD, DDE, and DDT—collectively DDx), and total suspended solids (TSS). Gunderson has conducted stormwater source control assessment and sampling for over a decade at the Site.

The Gunderson SCE Addendum was prepared in accordance with the requirements in the DEQ *Guidance for Evaluating the Stormwater Pathway at Upland Sites*. As detailed in the

SCE Addendum, Gunderson achieved the following for stormwater source control at the Site: (1) existing and potential facility-related contaminant sources have been identified and characterized; (2) contaminant sources are being controlled to the extent feasible; (3) stormwater and stormwater solids data collected following SCM implementation demonstrate that the SCMs have been very effective; (4) adequate measures are in place to ensure source control and good stormwater management measures occur in the future; and (5) contaminants in stormwater that exceed Portland Harbor Surface Water Cleanup Levels (CULs) or Joint Source Control Strategy Screening Level Values are not likely to result in sediment contamination in the receiving waterbody or contribute to unacceptable risk.

Stormwater Source Control Sampling for Dioxin/Furans

The Site stormwater source control analytical program has included many chemicals and analytical groups such as metals, PAHs, PCBs, BEHP, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), organochlorine pesticides including DDx, organotins, and TSS. The Site's initial review of applicable stormwater COIs determined that dioxin/furans were not a COI since there were no dioxin/furans contributing operations or potential sources. DEQ, the overseeing authority to the Stormwater Source Control program did not require dioxin/furans sampling. Therefore, Site stormwater samples have not been analyzed for dioxin/furans. In EPA's August 30, 2024 Memo to DEQ, the Site is being asked to sample for dioxin/furans, and notes that there are PHSS Record of Decision (ROD; EPA 2017) remedial action level (RAL) and principal treat waste (PTW) exceedances for PeCDD and TCDD in RM9W sediment along the majority of the Site shoreline (Foth 2022).

Gunderson has prepared the following work plan to conduct stormwater source control sampling for dioxin/furans at the Site during the 2024-2025 wet season.

Gunderson will collect stormwater samples from the source control monitoring program outfalls WR-127, WR-135, WR-136, and WR-141 for assessment of dioxin/furans. These outfalls were previously determined to be representative of stormwater discharging from the Site. Grab samples will be collected directly from the outfall or discharge point into laboratory-supplied sampling containers. Samples will be analyzed for dioxin/furans by EPA Method 1613. Laboratory method reporting limit (MRL) goals will be less than or similar to CULs or equal to the lowest limits achievable by the laboratory.

In accordance with the protocols in Appendix A of the DEQ *Guidance for Evaluating the Stormwater Pathway at Upland Sites*, Gunderson will strive[1] to target storm events meeting the following criteria:

- Antecedent dry period of at least 24 hours (as defined by <0.1 inch over the previous 24 hours);
- Minimum predicted rainfall volume of >0.2 inch per event;
- Expected storm duration of at least 3 hours; and
- Samples will be collected within 3 hours of the beginning of discharge.

[1] For safety reasons, sampling at the facility is restricted to daylight hours on weekdays, which limits the number of sampleable storms in a typical rain season. Additionally, samples will not be collected by onsite personnel, which will make sampling within three hours of rain commencement difficult under ideal circumstances.

Since there are no stormwater CULs, the results of the stormwater sampling will be compared to the Surface Water CULs in the Portland Harbor ROD Table 17. CULs are available for five individual dioxin/furan congeners (1,2,3,4,7,8- hexachlorodibenzofuran [HxCDF],1,2,3,7,8-pentachlorodibenzo-p-dioxin [PeCDD], 2,3,4,7,8-pentachlorodibenzofuran [PeCDF], 2,3,7,8- tetrachlorodibenzofurans [TCDF], 2,3,7,8-tetrachlorodibenzo-p-dioxin [TCDD]) as well as for the sum of 2,3,7,8-TCDD equivalents.

Two samples will be collected from each outfall (WR-127, WR-135, WR-136, and WR-141). If one or more of the dioxin/furan congeners in Portland Harbor ROD Table 17 are detected above the laboratory method detection limit (MDL) in one or both of the first two samples collected from an outfall, then an additional two samples will be collected from the associated outfall(s), for a total of four samples from each outfall.

Following the sampling, results will be detailed in a letter report submitted to DEQ. The report will include documentation of the methods and procedures of the sampling program, an assessment of the targeted storm events, a comparison of the results to the Portland Harbor ROD Table 17 Surface Water CULs and to the September 11, 2024 DEQ rank order curves for dioxin/furans in Portland Harbor stormwater. The report will include a source control evaluation for dioxin/furans in Site stormwater and an assessment of recontamination risk to the Willamette River.

Path Forward for Gunderson Stormwater Source Control

Gunderson is requesting DEQ's confirmation on our understanding of the status of and path forward for stormwater source control evaluation at the Site. Specifically, Gunderson is requesting DEQ's confirmation of the following:

1. With the exception of the dioxin/furan stormwater assessment discussed above, Gunderson no longer is required to continue performance stormwater monitoring at the Site. As noted in the September 11, 2024 DEQ letter, the current Site owner and operator, OGM Properties LLC and Gunderson Marine LLC, respectively, will continue to conduct stormwater sampling as required for compliance with their National Pollutant Discharge Elimination System General Industrial Stormwater Discharge Permit No. 1200 Z (NPDES 1200-Z Permit).

2. DEQ agrees with the conclusions in the SCE Addendum. Notably, DEQ agrees that the stormwater currently discharging from the facility meets DEQ and EPA source control requirements, with the exception of dioxin/furans, which have not been evaluated and are discussed below.

3. If the results of the dioxin/furan stormwater source control assessment are favorable and do not indicate a risk of recontamination to Willamette River sediment, it is our expectation that Gunderson will have fulfilled its obligation to obtain a stormwater source control decision. The decision will be issued when both the stormwater and groundwater source control evaluations and source control measures are completed.

Closing

Please confirm that Gunderson's understanding with respect to stormwater source control at the Site is correct. Gunderson requests that DEQ issue approval for the dioxin/furan sampling program proposed in the letter as soon as possible, so that the sampling can be completed during the 2024-2025 wet season.

Sincerely,

David J. Harvey
Senior Director EHS
The Greenbrier Companies

Copy (via email only):
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