



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

June 9, 2021

Colin Polk
Prosper Portland
222 NW 2nd Ave., Suite 200
Portland, OR 97209

RE: Comments on Draft Phase II Remedial Action Plan
for Centennial Mills in Portland
ECSI #5136

Colin:

The Department of Environmental Quality (DEQ) has completed its review of the draft *Phase II Remedial Action Plan* prepared by Hart Crowser on September 23, 2020 for the Tanner Creek Sewer outfall at Centennial Mills, located at 1362 NW Naito Parkway in Portland.

DEQ understands that work to install two grout collars around the Tanner Creek Sewer (TCS) on the Centennial Mills site will be awarded to a subcontractor, and that final decisions on a number of design and implementation elements will be left up to the subcontractor. For example, Section 8.b. of the Construction Notes on Sheet 4 in Appendix B discusses alternative backfill methods that the subcontractor may use. It is also left to the subcontractor to prepare an Erosion and Sediment Control Plan, and to obtain permits from the City of Portland.

While DEQ generally agrees with the installation of two grout collars around the TCS, we cannot grant a final approval to the *Phase II Remedial Action Plan* (RAP) without seeing a final set of plans and having a full understanding of the collar construction and installation methods. DEQ may reject or modify elements of the plans that are submitted, depending on what is proposed and the sufficiency of the documentation that is provided.

Please provide draft copies of final plans to DEQ as soon as they are available so that we may review and provide comments on the plans.

In the interim, DEQ has the following questions and comments about the information in the draft Phase II RAP. Please address these concerns in the draft final versions of the *Phase II Remedial Action Plan* and other plans that are submitted:

- Please provide a rationale for the location of the grout collars on the Centennial Mills site and why two collars, 15 feet apart, are being proposed. How will the locations of the collar excavations be determined in the field, and how will the post-construction collar locations be documented? Please label each of the collars so that they may be distinguished.

- If there are to be exclusion zones or protected work areas around the collar excavation pits, please identify these areas on the figure(s).
- The surfaces above the grout collars should be restored with asphalt, concrete, or another low permeability surface, rather than imported fill, to limit surface water infiltration above the collars.
- Please provide more information as to how entrained air will be removed during grout injection if vibratory methods will not be allowed. How will the presence or absence of void spaces between the box shoring and the sidewalls of the excavation trenches be documented?
- The Contaminated Media Management Plan (CMMP), included as Appendix C, was prepared in 2015. Hart Crowser and the selected subcontractor should review and revise the CMMP as necessary. If no revisions to the CMMP are determined to be necessary, a statement to that effect should be included in the Phase II RAP.

Finally, before proceeding with Phase II of the Remedial Action Plan, please provide DEQ with a report on the implementation of Phase I of the Remedial Action Plan.

If you have any questions about this letter or the project, please contact me at (503) 229-5369, or via e-mail at kevin.dana@deq.state.or.us. DEQ thanks you for your work on this project, and we look forward to implementing Phase II of the TCS remediation.

Sincerely,



Kevin Dana, Project Manager
Northwest Region Cleanup Program

cc: Chris Martin & Rick Ernst, Hart Crowser
ECSI #5136 File