



Oregon

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November 23, 2021

Colin Polk
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RE: Comments on Revised 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 revised draft *Phase II Remedial Action Plan* prepared by Hart Crowser on October 28, 2021 for the Tanner Creek Sewer outfall at Centennial Mills, located at 1362 NW Naito Parkway in Portland.

As a general comment, DEQ notes that a draft “Report of Geotechnical Engineering Recommendations” from Hart Crowser, dated August 4, 2020 and attached to the *Phase II Remedial Action Plan* as Appendix A, leaves many final decisions on implementation of the Remedial Action up to a yet-to-be-selected subcontractor or subcontractors. Some examples:

- Section 5.1 leaves final selection of a shoring method (from among three recommendations outlined by Hart Crowser) to a shoring subcontractor. It is also left to the subcontractor to “include descriptions of how excavations and fill operations during construction will be staged”, and to address the “presence of voids between the box shoring and the sidewalls of the trenches”.
- Section 5.2 hands responsibility for the “stability of the temporary slopes used for construction” off to an excavation subcontractor. The subcontractor will also determine the type and layout of dewatering systems and the type of grout backfill material used.
- Section 5.3 leaves final selection of a temporary storage method for dewatering water (aboveground tanks or a lined detention pond) to a subcontractor. The subcontractor will also be responsible for preparing and implementing an Erosion & Sediment Control Plan.

DEQ will need to approve the various construction methods proposed by the subcontractor(s), as well as the Erosion & Sediment Control Plan, before Phase II work begins at the site. Please ensure that the subcontractor(s) provide drafts of the proposed plans to DEQ so that we may review and provide comments on the plans. 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.

DEQ also has a general question on the grout collar design as shown on Cross Section A-A' on Sheet 3A in Appendix B. The drawing shows the grout collars extending to the top of the

Tanner Creek Sewer, about six (6) feet below ground surface (bgs). Section 2.2 of the *Phase II Remedial Action Plan* states that groundwater at Centennial Mills has been encountered at depths as shallow as five (5) feet bgs, while Section 3.3.2 of the Geotechnical report (Appendix A) states that groundwater has been measured at four (4) feet bgs and may rise to within 2-3 feet bgs. Is there any concern that liquid petroleum hydrocarbons will migrate through the soil above the TCS and grout collars after the collars have been installed?

DEQ has the following specific comments on the revised draft *Phase II Remedial Action Plan*:

- Section 1.0 (Introduction): The words “in the fall of 2020” should be deleted from the end of the paragraph.
- Section 1.2 (Scope of Work): The start of the second sentence should read “Phase I of the RAP involved” (past tense).
- Section 1.2 (Scope of Work): The sentence that begins “While these documents represent the current design” should be modified to state that the construction contractor will prepare additional plans and specifications.
- Top of Page 5: The last two sentences of the first paragraph appear to be missing a number of words and should be revised.
- Top of Page 6: The second sentence of the first bullet should state that *portions* of the backfill along the TCS will be replaced with grout barriers.
- Section 3.1 (Phase I – LPH Removal): The words “over 3 to 6 months” should be deleted from the end of the second sentence in the first paragraph.
- Section 3.2 (Phase II – Dual Grout Collar Installation): The anticipated Phase II completion date at the end of the first paragraph should be updated to 2022.
- Section 3.2.3 (Excavation Shoring): The last sentence should read “Options for shoring with, or without, external dewatering are discussed.”
- Section 3.2.4 (Earthwork): The second-to-last sentence should mention the asphalt paving above the aggregate base rock, as shown on Sheet 3A in Appendix B.

DEQ has the following comments on the draft *Report of Geotechnical Engineering Recommendations* (Appendix A):

- Section 5.1.5 (Construction Recommendations): The sentence beginning “Staged excavations to reduce . . .” at the bottom of Page 6 should end with “should be considered” or “is recommended”, or similar.
- Section 5.2.5 (Fill Placement and Compaction): Table 1 describes lift thicknesses up to 24 inches (2 feet) in depth, while Note 14.c.I on Sheet 4 in Appendix B references lifts up to 3 feet in depth. Please correct.
- Section 5.2.5 (Fill Placement and Compaction): The second bullet under Table 1 states that fill should be placed “at a moisture content within approximately 3 percent of optimum”, while Note 14.c.I on Sheet 4 in Appendix B references 2 percent of optimum. Please correct.

DEQ has the following comments on the *Specification Drawings* (Appendix B):

- Sheet 2: Two notes to “Install Temporary Erosion Control Measures” (on the drawing and in the aerial photo) have arrows pointing to security fencing rather than to an erosion control measure. Please revise.

- Sheet 2, Note 3: The one call utility location number should be 811, not 311.
- Sheet 3A, Cross Section A-A': All of the arrows on the right side of the figure are pointing at general trench backfill, and the 5' min measurement does not correctly align with the drawing. Please revise.

Finally, DEQ notes that Appendix C is a *Contaminated Media Management Plan* dated June 10, 2015. Hart Crowser has indicated that some changes and updates will be made to the *Contaminated Media Management Plan* (CMMP) prior to Phase II work beginning at the site. Please include the revised CMMP, with a revised date, as Appendix C.

Please prepare a final, signed and stamped version of the *Phase II Remedial Action Plan*, and provide DEQ with draft copies of the plans from the subcontractor(s) once those plans are available.

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,

A handwritten signature in blue ink that reads "Kevin Dana".

Kevin Dana, Project Manager
Northwest Region Cleanup Program

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