



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

November 2, 2021

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

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

Colin:

DEQ has completed its review of the *Draft Phase I Remedial Action Summary* prepared by Hart Crowser on August 9, 2021 for the Tanner Creek Sewer outfall at Centennial Mills, located at 1362 NW Naito Parkway in Portland.

Phase I of the Remedial Action for contaminated backfill around the Tanner Creek Sewer (TCS) involved the installation of two groundwater extraction wells within the backfill in May 2020. Beginning on July 2, the wells were manually pumped about three times a week, with water levels and product thickness measured in both wells (and nearby MW-2) prior to pumping. Generally, 100 to 150 gallons of groundwater were extracted during each round of pumping, with the rates dropping off in late October.

DEQ understands that pumping stopped from November 2020 through January 2021 before resuming for six weeks in February and early March. As of mid-March 2021, 4,324 gallons of groundwater and six (6) gallons of liquid petroleum hydrocarbons had been recovered and were being stored in an on-site aboveground storage tank (AST). Water levels and product thickness in the extraction wells continued to be monitored through at least the end of July 2021.

DEQ has the following comments on the *Draft Phase I Remedial Action Summary*:

- If well logs were prepared for the extraction wells (EXT-1 and EXT-2), the logs should be included in the summary report.
- More information on the “measurements and observations . . . used to estimate a range of potential recharge rates” should be included in the report.
- The text refers to a 6,900-gallon AST, while Figure 2 shows a 5,600-gallon AST.
- The text notes that the absorbent socks are “removed and adjusted during weekly water level measurements”, but does not specify if the socks are being replaced.
- DEQ recommends continuing to implement Phase I of the Remedial Action (periodically monitoring the extraction wells with pumping as needed) until Phase II of the Remedial Action is implemented.
- Please notify DEQ when the water and product in the AST has been disposed of.

Please prepare a final, signed and stamped version of the *Phase I Remedial Action Summary*. If you have any questions about this letter, 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 implementation of Phase II of the Remedial Action.

Sincerely,

A handwritten signature in blue ink that reads "Kevin Dana". The signature is written in a cursive, flowing style.

Kevin Dana, Project Manager
Northwest Region Cleanup Program

cc: Jennifer Casler & Rick Ernst, Hart Crowser
ECSI #5136 File