



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street Suite 600

Portland, Oregon 97232

800-452-4011 TTY 711

November 26, 2024

RE: DEQ Comments *Supplemental Remedial Investigation Work Plan*
Williams Controls Site
14100 SW 72nd Avenue
Portland, Oregon
ECSI #4081

Carolyn Stratton
Senior Corporate Director, Environmental Health and Safety
400 Interpace Parkway, Building D
Parsippany, NJ 07054

Carolyn Stratton,

The Oregon Department of Environmental Quality (DEQ) has completed a review of the *Supplemental Remedial Investigation Work Plan* (Work Plan) for the Williams Controls Site (SITE). Rambol Americas Engineering Solutions Inc. submitted the November 2024 report to DEQ on behalf of Williams Controls. The SITE address is 14200 SW 72nd Avenue, Portland, Oregon.

General

Please add a section to the report that describes the QA/QC that will be implemented for sampling each of the different media, including the number of trip blanks, frequency of duplicates, rinsate blanks, etc.

Specific Comments

Section 4.2—The former TCE Waste Drum Storage and centrifuge areas appear to be historical source areas that should be included in this description. Please include a figure showing the TCE concentrations in groundwaters, like Figure 11 (see also comments to Figure 11 below).

Section 5. Proposed Scope of Work—Additional groundwater data is proposed to evaluate “reductive de-chlorination occurring at different portions of the facility.” The work plan should describe the natural attenuation parameters to be collected and how the data will be evaluated to support a conclusion related to the occurrence of reductive de-chlorination. The nature and extent of the groundwater plume, both onsite and offsite, should be evaluated. An ecological assessment should be performed to determine if GW impacts on the creek.

Offsite groundwater shall be analyzed to determine if ecologic screening levels are exceeded. DEQ requests that a cooperative agreement be negotiated with the Gerber site to evaluate natural attenuation and screening of groundwater impacts to the creek.

Additional sampling locations may be required to fill this data gap.

Section 5.2.1—Please describe the rationale for the depths selected for the soil samples. This section states the sample results “will be compared to VI RBCs”; however, DEQs 2024 guidance does not provide soil RBCs for VI screening. Please revise how the soil data results will be used and screened.

Section 5.2.3—Before conducting indoor air sampling, a survey should be undertaken in the facility to identify any current source of VOCs.

Section 5.3—If MW-5 and MW-6 are present at the property, these should be included in the monitoring program to provide additional background/static water level information at the site. A product interface probe should be used to check for DNAPL at the bottom of each well included in the sampling program.

Section 6—Additional sections should include a summary of the soil gas and indoor air data and tabulated results for these results generated from the study. Please also include a section in the report to describe any deviations from the work plan.

Tables 2, 3, 5, and 6—Please add the applicable March 2024 vapor intrusion RBCs and present them at the general screening of the available data by highlighting (or bolding) all concentrations detected above the applicable RBC. As an example, TCE concentrations protective of an occupational worker exposed to indoor air would be screened against an RBC of 3 ug/m³, 100 ug/m³, and 13 µg/L, for air, soil vapor, and groundwater, respectively, so Table 3 would show the MW-13 sample results for 8/22/2022 (584 ug/L in groundwater) highlighted as it is above the RBC of 13 µg/L. Laboratory reporting limits above the applicable RBC should also be highlighted.

Table 3—Please include vinyl chloride in the summary tables for the groundwater samples collected from the monitoring wells.

Figure 2—Please include the location of known utility connections on this figure, including the locations of any sewer connections, and label interior restrooms.

Figure 3—Please add the historical surface water sample locations to this figure.

Figure 9 – Please add the property boundary lines to this figure.

Figure 11—

- The deep groundwater monitoring wells aren't included in this figure.
- This figure appears to be missing the PCE in groundwater concentrations for all historical sampling locations, including DVDV6, DV9, DV11, DV13, DV16.
- Include another figure, like Figure 11, showing the maximum TCE detections in groundwater during the same period as those shown for PCE. This additional

visual aid will help inform the sampling program and verify that soil gas concentrations/indoor air are being characterized in areas where historical sources of solvents were present in groundwater and could be contributing to the VOC concentrations in indoor air.

Figure 12 and Figure 13 – Include MW-06 in the GW sampling program.

Please address the specific comments and resubmit the Work Plan. Contact me if you have any questions.

Sincerely,

Jim Orr

Jim Orr, RG
DEQ Northwest Region Cleanup Section

Ec:
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YDO File ECSI File # 4081