



April 15, 2021
Project No. 8014.01.76

Alex Liverman
Oregon DEQ—NW Region
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Re: Notice of intent to perform Year 10 remedial monitoring activities for the Zidell Waterfront Property, Portland, Oregon, ECSI No. 689

Dear Ms. Liverman:

Maul Foster & Alongi, Inc., has prepared this letter to provide notice of Year 10 (2021) remedy monitoring activities on behalf of ZRZ Realty Company, Zidell Marine Corporation, and Tube Forgings of America, Inc. (collectively referred to in the operations, maintenance, and monitoring plan [OMMP; MFA, 2013] as Zidell) for the Zidell waterfront property located at 3121 SW Moody Avenue in Portland, Oregon. Postconstruction operations, maintenance, monitoring, and corrective action procedures for the bank and sediment remedy at the site are specified in the OMMP. Remedy construction was completed in 2011, with final landscaping of the bank completed in 2012 by Zidell under a consent decree (September 12, 2006, General Judgment on Stipulation and Consent, Case No. 0609-093), issued by the Oregon Department of Environmental Quality (DEQ).

The engineered bank and sediment cap is monitored to verify effective containment of underlying contamination. The cap-performance monitoring program was designed to detect and evaluate changes in cap integrity and thickness over time and is summarized in a table attached to the OMMP. In addition to routine quarterly visual cap inspections, Year 5 remedy monitoring activities were completed in 2016; these showed polychlorinated biphenyl (PCB) concentrations were consistent with ambient conditions (MFA, 2016a). Similar to Year 5 activities, Year 10 monitoring activities will include the following:

- Hydrographic survey (spring and summer 2021)
- Natural recovery monitoring (spring 2021)

A brief description of these activities and a proposed timeline follow.

Hydrographic Survey

A hydrographic survey of the sediment and bank cap will be performed in 2021 to collect data for the Year 10 cap physical integrity monitoring, as described in the OMMP and consistent with methodology used for Year 5 activities (MFA, 2016b). Cap-integrity monitoring is

performed to evaluate surface elevation changes over time and to determine if corrective action measures are necessary to maintain design functionality of the sediment cap.

The Year 10 hydrographic survey will use in-water bathymetric and shoreline topographic survey methods, consistent with the Year 3 and Year 5 monitoring events. The bathymetric survey likely will be completed in mid to late spring, when water levels are high, to allow the survey vessel to access the greatest possible cap area while this area is submerged. The land-based survey will be completed in late summer, when water levels recede, which will allow for collection of overlapping data points for the land and bathymetric surveys. Overlapping data points will be analyzed to identify any potential errors between the survey methods (e.g., significant elevation differences at overlapping points). Data from each survey will be combined into a single data set and terrain model, then compared to data from the Years 3 and 5 cap integrity monitoring surveys (collected in 2014 and 2016, respectively) and the as-built survey (collected in 2012).

Natural Recovery Monitoring

Routine monitoring of natural recovery of low-level contamination in sediment outside the cap boundary will be conducted using an incremental sampling method approach, described in Appendix A of the OMMP. Natural recovery monitoring is proposed for May–June 2021, when water levels will still be high enough to allow vessel access to the sediment sample locations. A sample report evaluating the results will be submitted in late 2021.

The sampling procedures defined in the OMMP will be followed, including in the original sample locations. Construction of the Tri-Met Tilikum Crossing Bridge in 2012 prevented access to three of the original sample locations (locations 28, 33, and 37) because of the presence of construction barges and a temporary work bridge. As the equipment has since been removed, the original sample locations, as proposed in Appendix A of the OMMP, were used in 2016 and will also be used during the 2021 sampling event.

In its comments on the 2016 Natural Recovery Monitoring Report (DEQ, 2017), the DEQ requested one additional sampling event and analysis of samples using both U.S. Environmental Protection Agency (EPA) Method 1668 (high-resolution mass spectrometry for analysis of PCB congeners) and Method 8082 (for PCB Aroclors). Although EPA Method 1668 would allow for higher-resolution analysis of PCB concentrations in sediments, Method 8082 analysis is sufficient for meeting the requirement stated in the DEQ-approved OMMP: to determine whether the average concentration of PCBs for the decision unit is consistent with ambient concentrations (i.e., between 10 and 20 micrograms per kilogram). Additionally, Method 8082 is consistent with previous sampling events, allowing for comparison and trend analysis to meet the objective of evaluating long-term natural recovery for this project. Therefore, Zidell plans to analyze samples using EPA Method 8082, consistent with the OMMP and past sampling events.

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Sincerely,

Maul Foster & Alongi, Inc.



Erik Bakkom
Principal Engineer



Jacob Faust
Senior Engineer

Attachment: References

cc: Alan Park, ZRZ Realty
Kathryn Silva, ZRZ Realty

LIMITATIONS

The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

REFERENCES

DEQ. 2017. 2016 natural recovery monitoring report, Zidell waterfront property, ECSI #689. Oregon Department of Environmental Quality. May 23.

MFA. 2013. Bank and sediment remedy operations, maintenance, and monitoring plan. Zidell waterfront property, Portland, Oregon. Maul Foster & Alongi, Inc., Portland, Oregon. June 12.

MFA. 2016a. 2016 Natural recovery monitoring report, Zidell waterfront property, Portland, Oregon. Maul Foster & Alongi, Inc., Portland, Oregon. November 21.

MFA. 2016b. Year 5 (2016) sediment cap bathymetric monitoring, Zidell waterfront property, Portland, Oregon. Maul Foster & Alongi, Inc., Portland, Oregon. December 19.