



# Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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February 7, 2025

Madi Novak  
U.S. Environmental Protection Agency  
805 SW Broadway, Suite 500  
Portland, OR 97205

*via electronic delivery (email)*

Re: DEQ Comments on the Draft Pre-Design Investigation Report  
Arkema In-Water Project Area  
Portland Harbor Superfund Site

Dear Madi Novak:

The Oregon Department of Environmental Quality (DEQ) reviewed the January 2025 *Draft Pre-Design Investigation Evaluation Report* (Draft PDI Report) prepared by Integral Consulting Inc. and Dalton Olmsted Fuglevand on behalf of Legacy Site Services LLC. The Draft PDI Report fulfills a portion of the requirements set forth by the U.S. Environmental Protection Agency (EPA) in the Administrative Settlement Agreement and Order on Consent for Remedial Design at River Mile 7W Project Area at the Portland Harbor Superfund Site.

DEQ's comment on the Draft PDI Report is presented below for your consideration. DEQ welcomes an opportunity to discuss the comment with you as necessary.

- Section 5.4, PTW NAPL and Field Observations of Sheens, Blebs, and Staining.** This section states that no NAPL was encountered during the pre-design investigation, but that blebs, sheens, and staining were observed. Based on the discussion of principal threat waste (PTW) provided in ROD Section 6.5.1, DEQ considers NAPL blebs offshore of Arkema to meet the definition of PTW-NAPL.

Thank you for the opportunity to comment. Please feel free to contact me at 503-860-3943 with any questions.

Sincerely,

*Katie DAUGHERTY*

Katie Daugherty, R.G  
Project Manager  
Cleanup Program, Northwest Region

cc: Lance Peterson, CDM  
Dave Lacey, DEQ  
Sarah Greenfield, DEQ