



CITY OF PORTLAND ENVIRONMENTAL SERVICES



The Portland Building ■ 1120 SW Fifth Ave, Suite 613, Portland, Oregon 97204 ■ Dawn Uchiyama, Director

February 12, 2025

via electronic mail

Daniel Hafley, RG
Project Manager/Hydrogeologist
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Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232

Re: Response to August 12, 2024 DEQ Comments on Per- and Polyfluoroalkyl Substances (PFAS) Investigation Report – Fire Station #2 Training Facility (ECSEI #6267)

Dan:

Thank you for your review and comment on the draft *Per- and Polyfluoroalkyl Substances (PFAS) Investigation Report* dated June 20, 2023, and prepared by Terraphase Engineering for the City of Portland Fire Bureau. The Bureau of Environmental Services (BES) Coordinated Site Assessment program has been providing technical support to the Portland Fire Bureau (PFB) and helping to coordinate site-related issues with DEQ. BES and PFB are also coordinating with the Portland Water Bureau to ensure that mutual interests and concerns related to this site are addressed. This letter represents a collective response to DEQ's comments on the above referenced report.

PFAS containing aqueous firefighting foam is no longer being used at this training facility and stormwater from the site currently is routed to the Columbia Wastewater Treatment Plant. Historic sources have been removed or mitigated and site conditions are not an immediate risk to the environment. Based on results of the attached report only shallow groundwater and soils were impacted by PFAS. Further investigation is planned for the site to address other concerns not included in this investigation.

Response to DEQ General Comment 1 re: Next Steps:

New PFAS groundwater regulations are anticipated by approximately July 2025, which are needed to inform subsequent investigations of PFAS at the site. Per the recommendations in the report and DEQ's concurrence on the value of additional investigation to refine understanding of the lateral and vertical extent of site-related PFAS contamination, a proposed workplan will be developed and submitted for DEQ review, following availability of new PFAS guidance on groundwater cleanup levels.

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Response to DEQ General Comment 2 re: Contaminant Screening:

The City updated screening data and information in the report to reflect current guidance. The revised final report is attached to this transmittal for DEQ review.

Response to DEQ General Comment 3 re: Groundwater Use:

The City will complete a water use survey in general accordance with DEQ's *Guidance for Conducting Beneficial Water Use Determinations at Cleanup Sites*, with focus on identifying domestic and municipal water supply wells/uses in the site vicinity and inform forthcoming site investigation work plan. Note that the City has undertaken voluntary annual PFAS screening of the active public water supply well NE of the site (Production Well 38) since 2018 and no PFAS have been detected.

A work plan will be developed to address DEQ recommendations and will be following the forth coming PFAS groundwater guidance. A draft work plan will be provided to DEQ for comment.

Thank you for your review and comment of the draft report. If you have additional questions, please send them to me and I will route them internally to colleagues at PFB, PWB, and BES as needed.

Sincerely,



Taryn H. Meyer, R.G.

Cc: Bill Goforth, Portland Fire Bureau
Doug Wise, Portland Water Bureau
Sarah Van Glubt, DEQ
Ken Thiessen, DEQ

Enc. (via electronic mail): *Per- and Polyfluoroalkyl Substances (PFAS) Investigation Report*, dated February 11, 2025, City of Portland Fire Station w Training Facility (ECSI Facility ID 6267)