

April 2, 2025

David Lacey
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Re: Riverbank Monitoring Report

Swan Island Upland Facility - Operable Unit 5

Portland, Oregon ECSI No. 271 1115-25

Dear David:

Apex Companies, LLC (Apex) prepared this *Riverbank Monitoring Report* on behalf of the Port of Portland (Port) for the Swan Island Upland Facility – Operable Unit 5 (OU5; Figures 1 and 2). This report documents monitoring of the OU5 riverbank completed on December 11, 2024 according to the *Revised Riverbank Monitoring Work Plan* (Work Plan; Apex, 2018).

#### **BACKGROUND**

Source control measures (SCM) at OU5 were implemented in 2016 (Apex, 2017). The general scope of the SCM included regrading of erosion scarps; placement of protective rip rap; removal of invasive plant species; placement of topsoil; and planting of native grasses, shrubs, and trees. The work was conducted on a portion of the OU5 riverbank (approximately 600 lineal feet adjacent to the Daimler leasehold) between 25 feet landward of the top of the bank and the ordinary line of high water. The SCM construction included placement of 150 cubic yards of imported rip rap and 220 cubic yards of imported topsoil in the source control action area. Filter fabric and a demarcation layer (orange plastic construction fencing) were placed on the riverbank between the existing soil and the rip rap. Site restoration included planting 690 shrubs and 30 trees. The SCM at OU5 was combined with the completion of landscaping associated with the OU2 removal action completed in January 2015.

Actions below the ordinary line of high water were deferred until implementation of the in-water remedy. To assure that the SCM is effective and deferral of a portion of the SCM would be protective, the Oregon Department of Environmental Quality (DEQ) requested long-term monitoring of the full length of the OU5 riverbank.

#### MONITORING REQUIREMENTS

The requirements for long-term monitoring of the OU5 riverbank are summarized below. A detailed description of these items is presented in the Work Plan.

**Inspection Items.** The following lists the items to be inspected during each monitoring event:

- 1. Rip Rap
  - a. Coverage of scarp repair areas

- b. Visibility of soil/filter fabric/orange demarcation layer
- c. Change in rip rap in areas outside scarp repair
- 2. Existing Erosion Features
  - a. Change in size or location
- 3. New Erosional Features
  - a. Change in surface vegetation/fills
  - b. Soil exposure/soft ground/erosion/slope movement
  - c. Springs/seeps
- 4. Sprinkler System
  - a. Condition of tank and pipes
  - b. Adequate coverage
- 5. Revegetation
  - a. General condition of plants
  - b. Topsoil
  - c. Tree staking
  - d. Invasive species
- 6. Additional Inspection Items
  - a. Fencing
  - b. Unauthorized encampments
  - c. Vandalism

**Inspection Checklist.** The inspection checklist included in the Work Plan was used in the field to document the inspection.

**Photographic Record.** Photograph stations (shown on Figure 3) were established to allow direct comparison of the riverbank between monitoring events. Photos from these stations are taken during each event (or from the same general area given limitations such as driftwood and vegetation).

#### **ACTIONS COMPLETED**

Monitoring of the OU5 riverbank was conducted on December 11, 2024. The event was conducted according to the Work Plan. The elevation of the Willamette River tide ranged from 5.44 feet to 6.75 feet (NAVD88) with low tide (5.17 feet NAVD88) occurring before the December 2024 inspection (USGS 2024). The results of the 2024 inspection are presented in the Inspection Checklist included as Attachment A and summarized below. Representative photographs of the repair areas taken during the December 2024 inspection event are presented in Attachment B. The photolog from the *Source Control Measures Work Plan* (Apex, 2015) is included as Attachment C to allow comparison to previous conditions.

**Rip Rap.** The rip rap coverage at repaired scarp locations J, L, M, and N as shown on Figure 3 was mostly consistent with the locations of the scarps as verified by utilizing previous inspection photos and landmarks along the riverbank. Minor exposure of filter fabric and depleted rip rap was observed at location L due to trespass. No other disturbances of the rip rap in areas outside the scarp repair were observed.

**Existing Erosional Features.** Existing erosional features B, D, E, I, J, O, and P were inspected for any change in size or location. Representative photographs in Attachment B show the existing conditions of these features. No significant changes in these features were observed during the 2024 inspection event.

**New Erosional Features.** The riverbank was inspected for new erosional features including scouring, scarps, slides, erodible soil, soft ground, depressions, or other changes. In general, no significant changes due to natural erosion were observed during the 2024 inspection event.

**Sprinkler System.** The sprinkler system is no longer in place at the riverbank. The system was removed in 2017 after operating for two growing seasons in accordance with the revegetation plan.

**Revegetation.** The vegetation planted during the SCM was inspected during the monitoring event. The entire revegetation area was covered with either trees, grass, or shrubs. No topsoil was visible in the revegetation areas. Grass and shrubs appeared healthy. Trees were dormant at the time of the inspection. The staking of trees was adequate.

Himalayan blackberry (*Rubus armeniacus*) was identified on the edges of the revegetation area. This is the only invasive species identified within the revegetation area. The areas adjacent to the revegetation area are rip rap and concrete debris. These areas were not vegetated and are dense with blackberries.

**Additional Items.** The fencing along the top of the SCM area separating the Vigor Industries, Cemex, and Daimler properties was in good condition. The gate, gate latch, and padlock at the Daimler leasehold are operational. The riverbank was inspected for vandalism and signs of unauthorized encampments or use. Cleanup of the previously observed unauthorized encampments along the riverbank has been conducted. Only sporadic residual litter was observed.

#### **PROPOSED CORRECTIVE ACTIONS**

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No corrective action is proposed at this time. No significant changes have been observed as a result of natural erosion since annual bank inspections were initiated in 2018 and the minor exposed bank repair demarcation and filter fabric layers will be addressed in coordination with in-water remedy activities. Based on the results of bank inspections conducted to date, the Port requests that the requirement for annual bank inspections be extended to once every three years (or following significant flood events).

If you have any questions regarding the contents of this letter, please do not hesitate to call me at (503) 974-0429.

Sincerely,

Steve Misner, R.G. Project Manager

#### REFERENCES

Apex Companies, LLC, 2015. Source Control Measures Work Plan, Swan Island Upland Facility, Operable Unit 5. September 18, 2015.

Apex Companies, LLC, 2017. Source Control Measures Completion Report. Swan Island Upland Facility, Operable Units 2 and 5. February 10, 2017

Apex Companies, LLC, 2018. Revised Riverbank Monitoring Work Plan. Swan Island Upland Facility – OU5. March 8, 2018.

USGS (Dec. 11, 2024). Willamette River at Portland Oregon retrieved from <a href="https://waterdata.usgs.gov/monitoring-location/14211720">https://waterdata.usgs.gov/monitoring-location/14211720</a>.

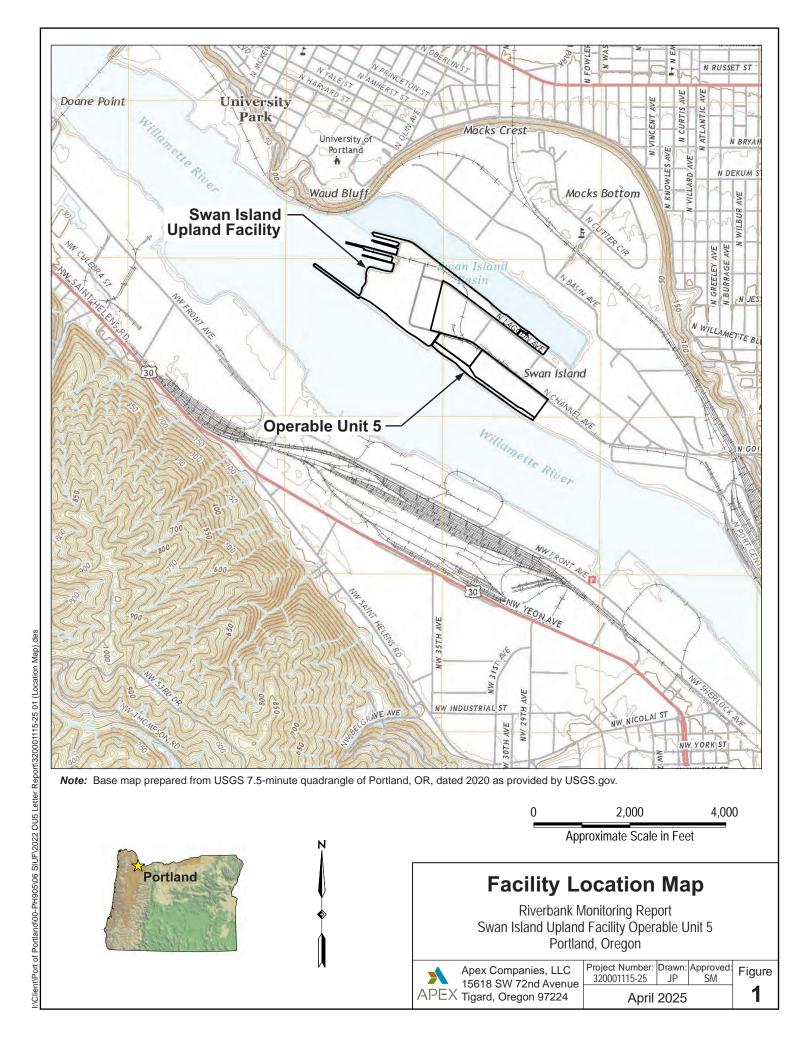
#### **ATTACHMENTS**

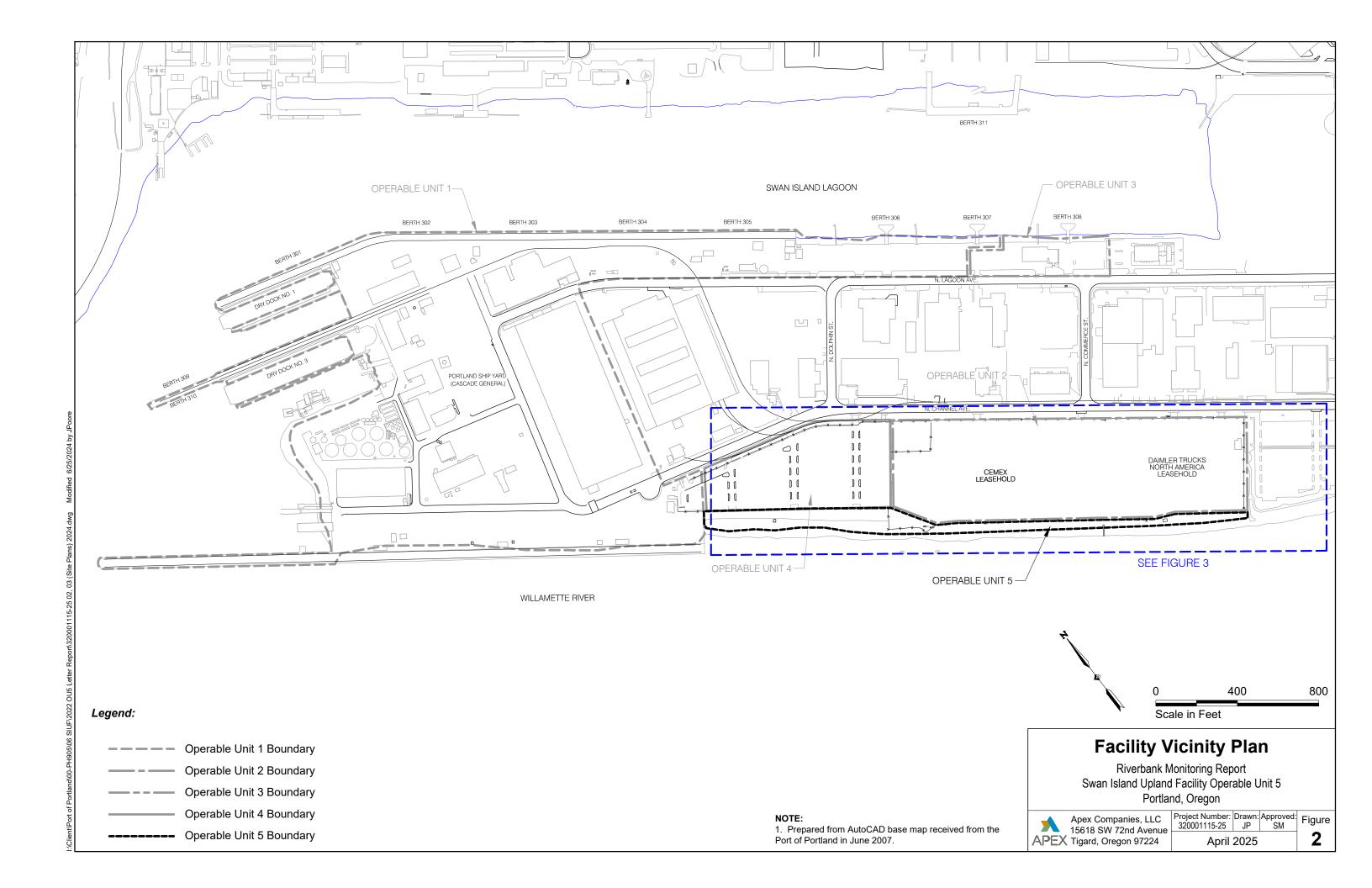
Figure 1 – Facility Location Map Figure 2 – Facility Vicinity Plan Figure 3 – Erosional Features

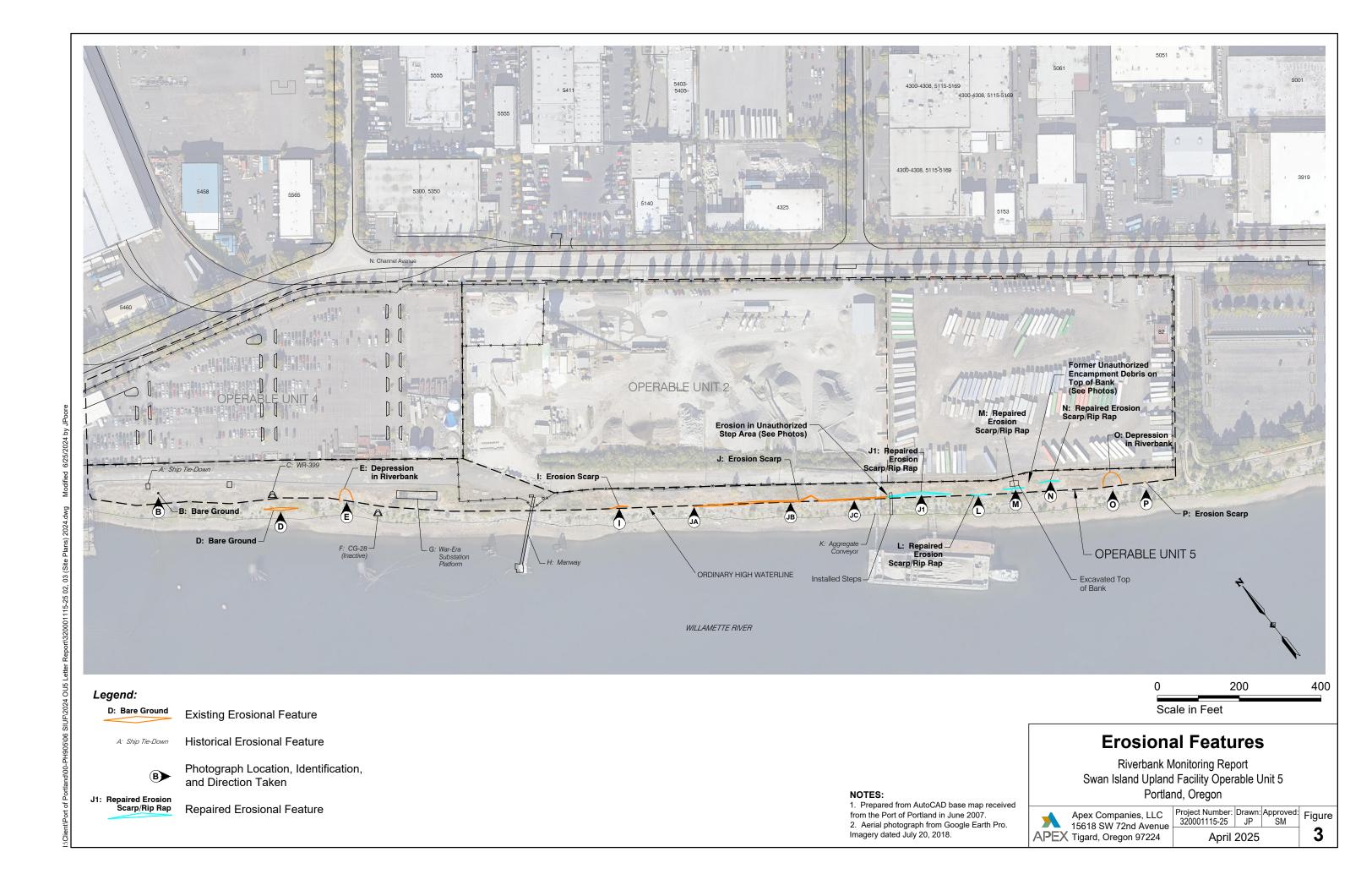
Attachment A – Source Control Inspection Checklist Attachment B – 2024 Photograph Log

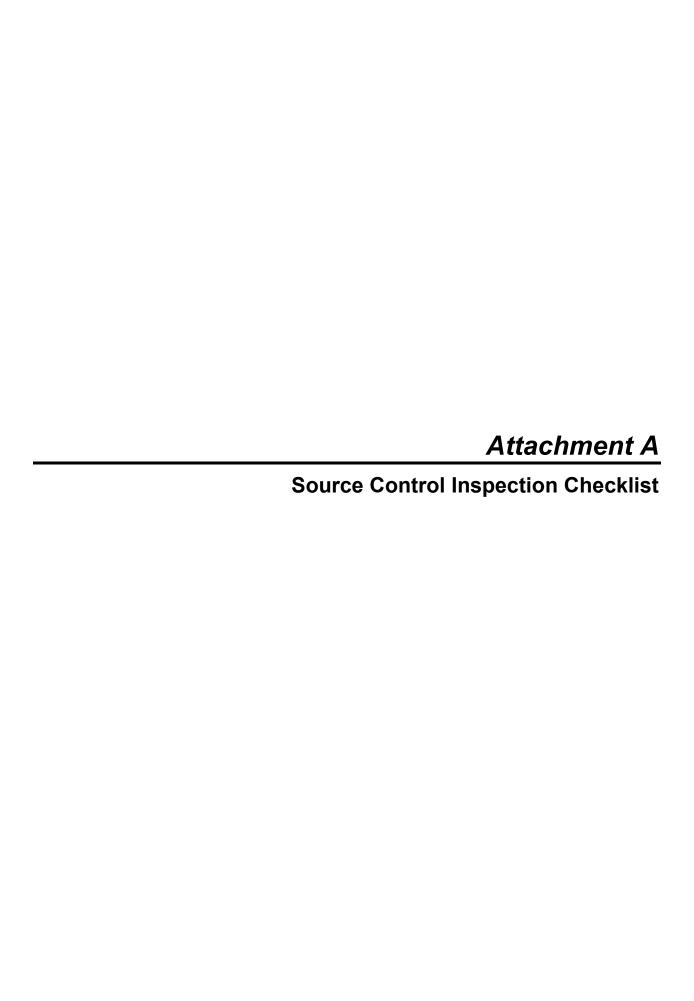
Attachment C – Source Control Measures Work Plan Photograph Log

cc: Eva DeMaria, US Environmental Protection Agency Laura Hanna, US Environmental Protection Agency Dwight Leisle, Port of Portland Daniel Read, Port of Portland Crystal Chase, Port of Portland Kerry Gallagher, Port of Portland Herb Clough, Apex









SOURCE CONTROL INSPECTION CHECKLIST					
Date / Time:		Inspector (Full Name):			
December 11, 2024 / 1000-1110		David Kolpacki			
USGS River Stage (ft msl NAVD88), if available:		River Level relative to base of Rip Rap (e.g., below, at, above), or Beach Exposed:			
5.44 ft @ 1005, 6.75 ft @ 1105,		Below base of rip rap, some beach exposed			
Weather Condition	t @ 1400, Low tide: 5.17 ft @ 0900				
Mostly cloudy, ~					
Feature	Inspection Item	Response	Comment	Corrective Action Required? (To Be Completed by Project Manager)	
Rip Rap	Is rip rap coverage consistent with	Yes⊠ No □		Yes □ No ⊠	
(at repaired Scarps J, L, M, N)	scarp locations?  Verify scarp coordinates (with GPS) to assess rip rap placement. Use the table of station coordinates to locate Stations A through Q to verify rip rap coverage at each location.			Riverbank 🗆	
	Has rip rap been disturbed in other locations other than the survey stations?  Collect GPS coordinates and photos of disturbance.	Yes □ No ⊠		Yes □ No 図 Riverbank □	
	Is the orange demarcation layer visible? Collect GPS coordinates and photos where visible.	Yes ⊠ No □	Minor exposure of demarcation layer between location J1 and JC at eastern edge adjacent to unauthorized installed steps. Bank repairs are intact.	Yes □ No 図 Riverbank □	
	Is filter fabric visible?	Yes ⊠ No □	Minor exposure of filter fabric and depleted	Yes □ No ⊠	

where visible.

Riverbank  $\square$ 

SOURCE CONTROL INSPECTION CHECKLIST				
Existing Erosional Features	Have existing erosional features changed (e.g., area, slope, depth)? Locate existing erosional features B, D, E, I, J (along Cemex only), O, and P along the OU5 riverbank. Describe	Yes No 🗵	No significant changes have been observed since the 2023 inspection.	Yes □ No 図  Top of Bank □
	changes in each feature and, as needed, collect GPS coordinates to describe the location of new/increased erosion.			Riverbank 🗆
New Erosional Features	Have new erosional features developed along the riverbank,	Yes □ No ⊠	No significant changes have been observed since the 2023 inspection.	Yes ⊠ No □
	including scouring, scarps, slides, etc? Check the entire length of the OU5 area. Collect GPS coordinates to describe the location of each end, top edge, and bottom edge of each scarp (as documented for a repaired scarp).			Top of Bank ⊠ Riverbank □
Sprinkler System	Is the sprinkler system installed in the revegetated area adjacent to the Daimler leasehold?	Yes No	NA	Yes  No  No  Top of Bank  Riverbank
	Is the water tank installed on the Daimler leasehold parking area?	Yes No No	NA	Yes
	Does the sprinkler system appear to be in working order? Indicate if operation is observed.	Yes No No	NA	Yes No Top of Bank Riverbank

SOURCE CONTROL INSPECTION CHECKLIST				
	Is the watering coverage adequate to support and maintain the landscaped vegetation?	Yes  No	NA	Yes  No  No  Top of Bank  Riverbank
Fencing	Is the fencing along the Vigor Industries property and the Cemex and Daimler leaseholds in good repair?	Yes ⊠ No □	Exception: Top bar and base of one panel of Cemex fence is broken but still attached. Hole in fence at top of manway on west end of Cemex.	Yes □ No 図  Top of Bank □  Riverbank □
	Do the gate latch and padlock work at the Daimler fence?	Yes ⊠ No □		Yes □ No ☒  Top of Bank □  Riverbank □
Habitation & Recreation	Are there any signs that OU5 is being used for encampment, hiking, recreation, etc?  Describe any impacts on source controls, including topsoil, rip rap, and vegetation.	Yes ⊠ No □	Minor riverbank disturbances due to unauthorized travel through site, mainly on heavily traveled foot paths. However, previously observed unauthorized encampments have been cleaned up and only minor residual litter remains.	Yes □ No ☒  Top of Bank □  Riverbank □
Vandalism	Are there any signs of vandalism? Describe.	Yes □ No 図		Yes □ No ☒  Top of Bank □  Riverbank □

**ADDITIONAL COMMENTS:** 



#### SOURCE CONTROL INSPECTION CHECKLIST Do not complete the following pages after November 2018 Corrective **Inspection Item** Response Comment Action **Feature** Required? **Re-Vegetation** Are trees and bushes healthy in the Yes 🗌 No 🗌 Yes 🔲 No 🗆 revegetated area adjacent to the Daimler leasehold? Top of Bank □ Describe. Riverbank $\square$ Yes 🗌 No 🗌 Yes □ No □ Do any trees require re-staking? Describe. Top of Bank □ Riverbank $\square$ Yes 🗌 No 🗀 Do any trees require trimming? Yes 🗆 No 🗀 Describe. Top of Bank □ Riverbank Is grass coverage adequate? Yes 🗆 No 🗀 Yes 🗆 No 🗆 Describe. Top of Bank □ Riverbank

SOURCE CONTROL INSPECTION CHECKLIST				
Invasive Species	Are invasive species growing in the landscaped area adjacent to the Daimler leasehold?  Describe.	Yes No No	Yes No Top of Bank Riverbank	
	Do invasive species require removal? Describe.	Yes No No	Yes No Top of Bank Riverbank	
Topsoil	Is topsoil thickness and coverage adequate adjacent to the Daimler leasehold?  Collect GPS coordinates to describe areas requiring repair.	Yes  No  No	Yes No Top of Bank Riverbank	

**ADDITIONAL COMMENTS:** 



2024 Photograph Log

Project Name: Riverbank Monitoring Report, OU5 Client: Port of Portland Location: Portland, Oregon

**Project Number:** 1115-25

Photo В Station:

Photo Date: 12/11/2024

Orientation: Northwest

### **Description:**

Existing erosional feature B adjacent to Vigor Industries.



Photo D Station:

Photo Date: 12/11/2024

Orientation: Northeast

## **Description:**

Existing erosional feature D adjacent to Vigor Industries.



Project Name: Riverbank Monitoring Report, OU5 Client: Port of Portland Location: Portland, Oregon

**Project Number:** 1115-25

Photo Ε Station:

Photo Date: 12/11/2024

Orientation: Northeast

### **Description:**

Existing erosional feature E (depression in riverbank) adjacent to Vigor Industries.



Photo Ε Station:

Photo Date: 12/11/2024

Orientation: North

## **Description:**

Existing erosional feature E (depression in riverbank) adjacent to Vigor Industries.



Project Name: Riverbank Monitoring Report, OU5
Project Number: 1115-25
Client: Port of Portland
Location: Portland, Oregon

Photo Station:

**Photo Date:** 12/11/2024

Orientation: Northeast

### **Description:**

Erosional feature I (erosion scarp) adjacent to Cemex leasehold.



Photo JA

**Photo Date:** 12/11/2024

**Orientation:** Northeast

## **Description:**

Existing erosional feature JA (west end of erosion scarp) adjacent to Cemex leasehold.



Project Name: Riverbank Monitoring Report, OU5
Project Number: 1115-25
Client: Port of Portland
Location: Portland, Oregon

Photo JB

Photo Date: 12/11/2024

Orientation: Northeast

### **Description:**

Existing erosional feature JB (center of erosion scarp) adjacent to Cemex leasehold.



Photo JC Station:

**Photo Date:** 12/11/2024

**Orientation:** Northeast

## **Description:**

Existing erosional feature JC (east end of erosion scarp) adjacent to Cemex leasehold.



Project Name: Riverbank Monitoring Report, OU5

Client: Port of Portland Project Number: 1115-25 Location: Portland, Oregon

Photo J1 Station:

Photo Date: 12/11/2024

Orientation: Northeast

### **Description:**

Erosional feature J1 (repaired former erosion scarp) rip rap at west end of Daimler leasehold.

Note: Rip rap in place and silt fence still visible.



Photo L Station:

Photo Date: 12/11/2024

**Orientation:** Northeast

## **Description:**

Erosional feature L (repaired former erosion scarp) rip rap adjacent to Daimler leasehold.

Note: Exposed edge of filter fabric and depleted rip rap.



Project Name: Riverbank Monitoring Report, OU5

Project Number: 1115-25

Client: Port of Portland Location: Portland, Oregon

Photo M

Photo Date: 12/11/2024

Orientation: Northeast

### **Description:**

Erosional feature M (repaired former erosion scarp) rip rap adjacent to Daimler leasehold.

Note: Area of former unauthorized encampment structures.



Photo N

**Photo Date:** 12/11/2024

**Orientation:** Northeast

## **Description:**

Erosional feature N (repaired former erosion scarp) rip rap adjacent to Daimler leasehold.



Project Name: Riverbank Monitoring Report, OU5
Project Number: 1115-25
Client: Port of Portland
Location: Portland, Oregon

Photo O

**Photo Date:** 12/11/2024

Orientation: Northeast

### **Description:**

Erosional feature O (depression in riverbank) adjacent to Daimler leasehold.

Note: Burned former unauthorized encampment structures. Large concrete blocks in the area.



Photo O

**Photo Date:** 12/11/2024

Orientation: North

## **Description:**

Erosional feature O (depression in riverbank) adjacent to Daimler leasehold.

Note: Burned former unauthorized encampment structures. Large concrete blocks in the area.



Project Name: Riverbank Monitoring Report, OU5

Client: Port of Portland Location: Portland, Oregon Project Number: 1115-25

Photo Ρ Station:

Photo Date: 12/11/2024

Orientation: Northeast

#### **Description:**

Erosional feature P (erosion scarp) near east end of Daimler leasehold.

Note: Burned former unauthorized encampment structures.



Photo N/A Station:

Photo Date: 12/11/2024

**Orientation:** Northwest

## **Description:**

Top of bank near features M and N.

Note: Unauthorized encampment structures and litter observed in 2023 at top of bank have been cleared.



Project Name: Riverbank Monitoring Report, OU5

Project Number: 1115-25

Client: Port of Portland Location: Portland, Oregon

Photo N/A Station:

Photo Date: 12/11/2024

Orientation: Southwest

### **Description:**

Top of bank near features M and N looking down.

Note: Observed unauthorized encampment litter.



Photo N/A Station:

**Photo Date:** 12/11/2024

Orientation: Southwest

#### **Description:**

Previously noted location of the unauthorized installed steps at the north end of J1.

Note: Erosional features with exposure of filter fabric at the northern edge of the repaired scarp J1. The steps appear to have mostly disappeared.



Project Name: Riverbank Monitoring Report, OU5
Project Number: 1115-25
Client: Port of Portland
Location: Portland, Oregon

Photo N/A Station:

Photo Date: 12/11/2024

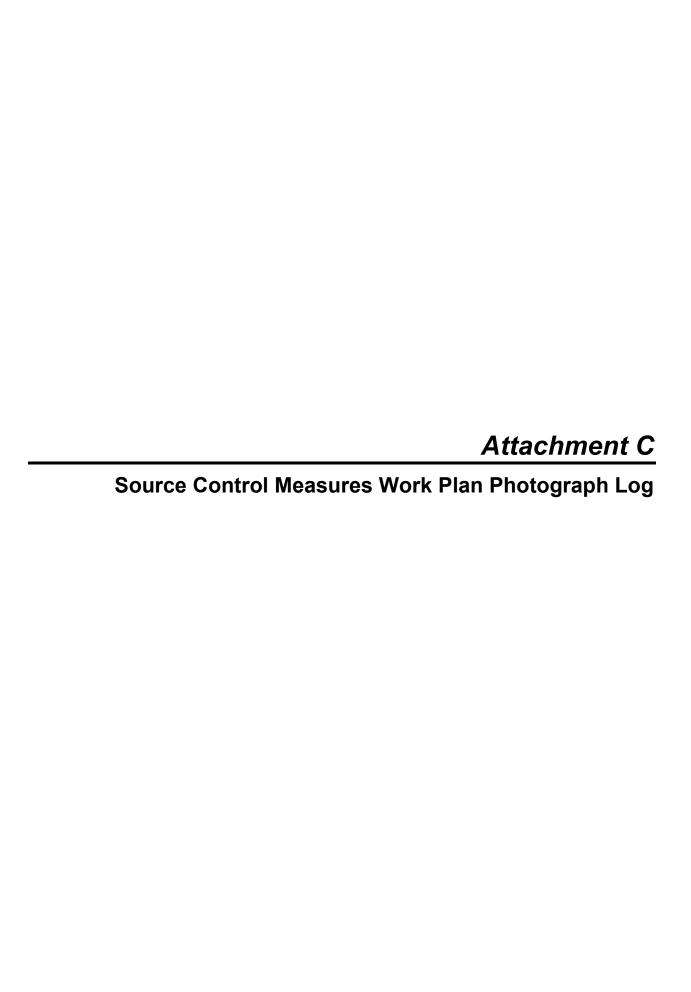
Orientation: North

### **Description:**

Previously noted location of the unauthorized installed steps at the north end of J1.

Note: Erosional features with exposure of filter fabric at the northern edge of the repaired scarp J1. The steps appear to have mostly disappeared.





**Project Name:** SIUF – OU5 Source Control Work Plan

**Project Number:** 1115-05

Client: Port of Portland Location: Portland, Oregon

Photo Btation:

Photo Date: October 7, 2010

**Orientation:** Northeast

## **Description:**

Feature B – Bare ground approximately 1 foot in diameter.



Photo D Station:

Photo Date: October 7, 2010

Orientation: East

## **Description:**

Southeast end of Feature D – Bare ground below Outfall WR-399 with dimensions of approximately 3 feet by 80 feet.



**Project Name:** SIUF – OU5 Source Control Work Plan

**Project Number:** 1115-05

Client: Port of Portland Location: Portland, Oregon

Photo E

Photo Date: October 7, 2010

**Orientation:** East

### **Description:**

Feature E – Depression in riverbank to left of individual in photograph. Width is approximately 30 feet. Topography is hummocky and surface is densely vegetated.



Photo Station:

Photo Date: October 7, 2010

I

Orientation: North

## **Description:**

Feature I – Erosion scarp 35 feet long and up to 1.5 feet high.



**Project Name:** SIUF – OU5 Source Control Work Plan

**Project Number:** 1115-05

Client: Port of Portland Location: Portland, Oregon

Photo JA

Photo Date: October 6, 2010

**Orientation:** Northeast

### **Description:**

Feature J – Erosion scarp 635 feet in length. Height is variable up to 6.6 feet. This photograph shows a minimal height scarp (hidden in vegetation).



Photo JC Station:

Photo Date: October 6, 2010

Orientation: North

#### **Description:**

Feature J – Erosion scarp 635 feet in length. Height is variable up to 6.6 feet. This photograph shows a maximal scarp.



**Project Name:** SIUF – OU5 Source Control Work Plan

**Project Number:** 1115-05

**Client:** Port of Portland **Location:** Portland, Oregon

Photo L Station:

Photo Date: October 6, 2010

**Orientation:** Northeast

### **Description:**

Feature L – Erosion scarp 56 feet long and up to 3 feet high.



Photo M Station:

Photo Date: October 7, 2010

**Orientation:** Northeast

## **Description:**

Feature M - Erosion scarp 53 feet long and up to 2.7 feet high.



**Project Name:** SIUF – OU5 Source Control Work Plan

**Project Number:** 1115-05

Client: Port of Portland Location: Portland, Oregon

Photo N

Photo Date: October 6, 2010

**Orientation:** Northeast

### **Description:**

Feature N – Erosion scarp within depression in riverbank. Erosion scarp is 49 feet long and up to 2 feet high. Depression width is approximately 80 feet. Topography is hummocky and surface is densely vegetated.



Photo O Station:

Photo Date: October 6, 2010

**Orientation:** Northeast

#### **Description:**

Feature O – Depression in riverbank. Width is approximately 50 feet. Topography is hummocky and surface is densely vegetated.



Project Number: 1115-05 Location: Portland, Oregon

Photo P

Photo Date: October 6, 2010

**Orientation:** Northeast

## **Description:**

Feature P – Erosion scarp 2.1 feet long and up to 1.1 feet high.

