



Oregon

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May 7, 2025

Laura Hanna
U.S. Environmental Protection Agency
805 SW Broadway, Suite 500
Portland, OR 97205

via electronic delivery (email)

Re: DEQ Comments on the Field Change Request—Data Gaps Vertical and Lateral
Delineation of Sediment Contamination and Bulk Material Testing Approach Technical
Memorandum
Arkema In-Water Project Area
Portland Harbor Superfund Site

Dear Laura Hanna:

The Oregon Department of Environmental Quality reviewed the April 29, 2025 *Field Change Request—Data Gaps Vertical and Lateral Delineation of Sediment Contamination and Bulk Material Testing Approach Technical Memorandum* (FCR Data Gaps Memo) prepared by Integral Consulting Inc. and Dalton Olmsted Fuglevand on behalf of Legacy Site Services LLC. The FCR Data Gaps Memo continues work to fulfill a portion of the requirements set forth by the U.S. Environmental Protection Agency in the Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Design at River Mile 7W Project Area at the Portland Harbor Superfund Site.

DEQ's comments on the FCR Data Gaps Memo are presented below for your consideration. DEQ welcomes an opportunity to discuss these comments with you as necessary.

1. **Lateral Delineation.** The FCR Data Gaps Memo indicates lateral delineation is not being pursued beyond the upstream and downstream Arkema project boundaries because additional lateral step-outs would encroach into other project areas. This limitation is understandable provided the RM7W Arkema data is incorporated into the adjacent project areas sediment management area (SMA).
2. **Lateral Delineation.** The FCR Data Gaps Memo indicates lateral delineation is not being pursued beyond the navigation channel centerline. While DEQ understands the Arkema project area is defined by the AOC, data indicates contamination from Arkema may extend past the navigation channel centerline. DEQ recommends EPA request Arkema modify the ACO and extent of the SMA across the centerline as needed or identify the responsible party who will address contamination from Arkema past the centerline.

3. **Polychlorinated biphenyls (PCBs) Analysis.** DEQ recommends analyzing sediments samples or a subset of samples for total PCB by high resolution congener analysis 1668. This recommendation is based on the following.

- a. The fingerprint of PCBs at Arkema are not Aroclor based but rather congeners that are formed via chlorination in the graphite cells; and
- b. Aroclor 1254 patterns and DDT have significant known co-elution on low resolution gas chromatography analysis. It is not clear how these would be distinguished in terms of reporting concentrations. Both conditions could significantly underestimate concentrations of total PCBs in sediments.

If total PCBs in sediment samples must be estimated using Aroclor analysis, ensure all Aroclors are included in the analyte list including the summation of Aroclor-1016, 1221, 1232, 1242, 1248, 1254, 1260, 1262, and 1268.

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

Sincerely,



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

cc: Lance Peterson, CDM
Dave Lacey, DEQ