REGION 10
SEATTLE, WA 98101

November 13, 2024

MEMORANDUM

SUBJECT: EPA Comments on Work Plan: Monitoring Well Installation and Ground Water Monitoring
Lampros Steel Facility, Portland, Oregon
ECSI # 2441
October 1, 2024

FROM: Laura Hanna, RG, Remedial Project Manager
Superfund and Emergency Management Division

TO: Jim Orr, Project Manager
Northwest Region Cleanup Program, Oregon Department of Environmental Quality

The following are the U.S. Environmental Protection Agency's (EPA's) comments on the document titled *Work Plan: Monitoring Well Installation and Ground Water Monitoring* (Work Plan). The Work Plan was prepared by EVREN Northwest, Inc. (ENW) for Johnson-Lampros Warehouse LLC. The Lampros Steel Facility (hereinafter referred to as the site) is located at 9040 N Burgard Way, Portland, Oregon, in Portland, Oregon and listed as Environmental Cleanup Site Information (ECSI) #2441. The site is upland of the River Mile 3.5 East (RM3.5E) project area of the Portland Harbor Superfund Site (PHSS). The Work Plan focuses on potential groundwater contributions to storm water discharge from the site.

EPA understands the primary objectives of the Work Plan are to propose a plan for groundwater assessment at the site to identify whether impacted groundwater has the potential to reach and discharge into the Willamette River. EPA's comments are categorized as "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the objectives.

To Be Considered Comments

1. **General.** Provide Standard Operating Procedures (SOPs) or references documenting the field procedures that will be followed. These should include, but are not limited to, packing and

shipping sample coolers, dry weather flow monitoring, field documentation, and using peristaltic pumps.

2. **General.** Describe the rationale for soil boring locations. No explanation is currently provided for the selection of B-1, B-8, and halfway between B-8 and B-10. Boring B-5, for example, has constituents of interest (COI) concentrations comparable to or greater than the selected locations.

3. **Section 2.0, page 2.** Provide a reference to the Stormwater SCE Sampling and Analysis Plan that referred to as the basis for the refined COIs list.

4. **Section 4.1, page 3.** Clarify what field screening measures will be used to identify impacted soil. The section states that field screening will determine soil sample locations. The work plan should provide the field screening criteria and steps for consistent identification and selection of the "impacted" portion of the core for sampling by any qualified field personnel in the field.

5. **Section 4.1.4, page 4.** The wording of the second sentence of the section is unclear. Revise the section to explicitly state that a synoptic water level event will be performed, as opposed to collecting water levels at each well prior to purging.

6. **Section 4.1.4, page 5.** Describe the procedure to be followed if parameters do not stabilize after a specified number of readings or volume purged. Additionally, explain at what interval the readings will be taken (e.g., 1 tubing volume or every 3 to 5 minutes).

cc: Dave Lacey, DEQ
Rich Francis, EPA
Katie Young, CDM Smith