

Department of Environmental Quality Northwest Region

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July 7, 2025

Dwight Leisle, Environmental Project Manager Port of Portland 7200 NE Airport Way Portland, OR 97218 Via Email

Re: DEQ Review "Riverbank Monitoring Report"

ECSI No. 271

Dear Mr. Leisle:

The Department of Environmental Quality (DEQ) received the April 2, 2025, *Riverbank Monitoring Report, Swan Island Upland Facility-Operable Unit 5*, prepared by APEX for the Port of Portland (Port). The Report presents results from the 2024 annual inspection of the riverbank erosion protection source control measure which was implemented in 2016. The inspection was completed on December 11, 2024 and done in accordance with the 2018 Revised Riverbank Monitoring Work Plan¹. No significant changes were reported and based on the results of bank inspections conducted to date, the Port requested that the requirement for annual bank inspection be extended to once every three years (or following significant flood events). DEQ's review comments are presented below.

Specific Comments

- 1. DEQ does not approve the requested reduction in annual to once every three years. Please continue annual inspections in accordance with Work Plan.
- 2. DEQ requests to be notified prior to 2025 inspection so that we can participate in the inspection and discuss future reduction in inspection frequency.

If you have any questions please feel free to contact me at (503) 229-5354.

¹ Apex Companies, LLC, 2018. Revised Riverbank Monitoring Work Plan. Swan Island Upland Facility – OU5. March 8, 2018.

Sincerely,

David Lacey

Project Manager

Northwest Cleanup Section

cc: Herb Clough, APEX.

Laura Hanna, EPA Todd Vanek, DEQ

Project File