



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

Northwest Region

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February 7, 2025

*Via Email*

Erich Wilhelm  
Wilhelm Trucking Company  
PO Box 10363  
Portland, Oregon 97210-0363

RE: DEQ comments on Technical Memorandum: Source Control Evaluation Summary  
3250 Northwest Saint Helens Road  
Portland, Oregon, 97210  
ECSI #6420

Erich Wilhelm:

The Department of Environmental Quality (DEQ) has reviewed the work plan titled *Post-Storm Water Source Control Measures Performance Monitoring* (Work Plan) for the Wilhelm Trucking property (Site) submitted by Evren Northwest on December 13, 2024. The purpose of the work proposed in the Work Plan is to evaluate the effectiveness of source control measures implemented at the Site. DEQ has prepared the following comments:

### General Comments

1. The Work Plan was submitted to DEQ on December 13, 2024, but the issued date on the cover page and in the footers of the Work Plan is listed as May 1, 2024. Following revisions based on DEQ and EPA comments, please update the issued date to correspond with the submission date.
2. Throughout the report, several footnote references are not available and display as an error message. Please correct the footnotes where necessary.

### Specific Comments

3. Section 1.1 Purpose: The section does not state the purpose of the Work Plan. Please revise this section to include a statement about the purpose of the Work Plan or change the section heading to a more appropriate title.
4. Section 4.4 – The list of contaminants of interest (COIs) should include all contaminants listed in the Portland Harbor Superfund Site Record of Decision Table 17, or the rationale for why the contaminants are excluded from the proposed sampling.
5. Section 4.5.3 – DEQ recognizes the logistical challenges associated with collecting storm water samples; however, the storm sampling requirements for the National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater Permit 1200-Z are not

acceptable alternatives to the Portland Harbor Joint Source Control Strategy storm sampling requirements. Adhering to target storm event criteria will help ensure that storm water runoff will be adequate for sample collection, will be representative of storm water runoff, and will be consistent with other sites undergoing storm water screening evaluations.

Included as an attachment to this letter is the United States Environmental Protection Agency, Region 10 (EPA) Comments Letter on the Work Plan. DEQ generally agrees with EPA's comments and both DEQ's and EPA's comments should be addressed in a revised document for approval. Please prepare a revised Work Plan and resubmit to DEQ within 30 days.

DEQ appreciates the continuing efforts of Wilhelm Trucking Company to demonstrate source control. Please call me at 503-926-2257 if you have any questions.

Sincerely,



Rebecca Digiustino  
Project Manager  
Northwest Cleanup Section

Ec:

Dave Lacey, DEQ  
Laura Hanna, EPA  
Carson Bowler, Law Office of Carson Bowler  
Lynn Green, Evren Northwest  
ECSI File # 6420

Attachment(s): EPA Review Letter



## REGION 10

SEATTLE, WA 98101

February 6, 2025

### **MEMORANDUM**

**SUBJECT:** EPA Comments on Work Plan for Post-Storm Water Source Control Measures  
Performance Monitoring  
Wilhelm Trucking Company, Portland, Oregon  
ECSI #6420  
May 1, 2024

**FROM:** Eva DeMaria, Remedial Project Manager  
Superfund and Emergency Management Division

**TO:** Rebecca DiGiustino, 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 for Post-Storm Water Source Control Measures Performance Monitoring* (SCM Performance Monitoring Work Plan). The SCM Performance Monitoring Work Plan was prepared by EVREN Northwest, Inc. for the Wilhelm Trucking Company. The Wilhelm Trucking Company is located at 3250 NW St. Helens Road, Tax Lot 600, in Portland, Oregon and listed as Environmental Cleanup Site Information (ECSI) #6420. The site is located approximately 3,300 feet from the Willamette River upland of the River Mile 9 West remedial design project area within the Portland Harbor Superfund Site (PHSS). The SCM Performance Monitoring Work Plan focuses on the stormwater upland source contaminant transport pathway.

EPA understands the primary objective of the SCM Performance Monitoring Work Plan is to present the sampling and analysis plan for the upcoming stormwater sampling at the facility. EPA's comments are categorized as "Primary," which identify concerns that must be resolved to achieve the objective; "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the objectives; and "Matters of Style," which substantially or adversely affect the presentation of the technical information provided in the report.

## Primary Comments

1. **Previous EPA Comments on the *Technical Memorandum: Source Control Evaluation Summary*:** Section 4.10 states that the source control evaluation (SCE) report will address the Oregon Department of Environmental Quality (DEQ) comments on *Technical Memorandum: Source Control Evaluation Summary*. DEQ also provided EPA comments as an attachment when providing technical comments, and EPA requests that the SCE report also addresses EPA comments on *Technical Memorandum: Source Control Evaluation Summary*.
2. **Table 1:** Laboratory methods should be selected that provide sufficiently low method detection limits to support data evaluations and conclusions. For example, dioxins/furans method detection limits should at a minimum be below the “knee” of the rank order curves provided in the July 2024 update to DEQ’s *Guidance for Evaluating the Stormwater Pathway at Upland Sites* (DEQ 2009). The dioxin/furan laboratory method detection limits in Table 1 do not appear to be accurate and should be reviewed to determine whether the appropriate laboratory methods have been selected to achieve study objectives.

## To Be Considered

1. **Section 1.2 Site History:** The SCE report should include a description of ongoing activities at the site to support site characterization. Section 1.2 indicates that the previous site activities conducted by Wilhelm Trucking Company were discontinued in 2018 and that new tenants have occupied the facility since 2023. Industrial operations or other site activities with the potential to generate pollutants in stormwater should be described in the SCE report, including the purpose and operations of the water treatment tanks shown on Figure 3.
2. **Section 4.5.3 Storm Event Criteria:** Two stormwater samples should be collected to represent first-flush conditions, and the other two stormwater samples should be collected within the first three hours after onset of discharge in accordance with Appendix D (Section D.5.2) of the Joint Source Control Strategy (DEQ and EPA 2005). Samples collected using NPDES 1200-Z general permit criteria (i.e., within the first 12 hours of discharge) will be considered less representative of site conditions.
3. **Section 4.6 Analytical Methods and Concentration Goals:** In addition to reporting 2,3,7,8-Tetrachlorodibenzodioxin (TCDD) equivalents, individual dioxin/furan congeners should be provided in the SCE report (at a minimum, the five dioxin/furan congeners presented in Table 1). The individual dioxin/furan congeners should be compared to the rank order curves for stormwater at Portland Harbor-area Industrial Sites that were developed by DEQ and provided in the July 2024 update to DEQ’s *Guidance for Evaluating the Stormwater Pathway at Upland Sites* (DEQ 2009).
4. **Table 4-2 Analytical Protocol, Storm Water:** Per standard method SM5310C, total organic carbon samples should be preserved with HCl, H<sub>2</sub>SO<sub>4</sub>, or H<sub>3</sub>PO<sub>4</sub>, depending on instrument recommendations.

5. **Section 4.7 Quality Assurance and Quality Control:** Collection of an equipment/bottle blank sample is recommended to verify there is no cross-contamination associated with the sampling equipment, bottles, or preservatives.

### **Matters of Style**

1. There are several error messages present in the document that appear to be associated with missing references (e.g., second sentence of Section 1.2). These errors should be corrected in future reports to ensure that all references are included.

### **References**

DEQ. 2009. *Guidance for Evaluating the Stormwater Pathway at Upland Sites*. Updated July 2024.

DEQ and EPA. 2005. *Portland Harbor Joint Source Control Strategy*.