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September 22, 2025
Project No. M1381.01.001

Oregon Department of Environmental Quality
700 NE Multnomah St., Suite 600
Portland, OR 97232

Re: Final Source Control Evaluation Report – Dolan Property

Maul Foster & Alongi, Inc. (MFA) prepared this letter on behalf of Dolan and Company, LLC (Dolan) in response to comments received from the Oregon Department of Environmental Quality (DEQ) on the previously submitted Stormwater Source Control Evaluation Report dated January 30, 2024. Based upon DEQ requests for additional information, MFA has prepared the Final Source Control Evaluation report, attached, to compile previously submitted information. The DEQ comments are presented below in italics followed by MFA's response in bullets.

DEQ Comments:

In general, the report does not provide sufficient background information to support the main conclusion of the report, i.e., that the Clarus stormwater system is not needed to meet source control goals. This information may be presented in earlier source control work plans or reports, however, DEQ requests this information be provided in the SCE Report to avoid 1) DEQ needing to spend the significant effort it would take to pull together the text, tables and figures that will be needed in the Source Control Decision document and 2) it will allow for the Technical Consultation Team (TCT) to comment and identify any issues prior to DEQ developing the proposed SCD.

- **Response:** To address DEQ's request for additional information provided in prior work plans and communications, MFA has compiled information from the 2017 stormwater sampling events, prior stormwater system maintenance (clean outs, pump maintenance, basin filter replacement, and sweeping), catch basin sediment sampling, composite soils sampling, and the 2022/2023 stormwater sampling events. This is presented in the attached Final Source Control Evaluation Report.

  MFA's conclusion that the Clarus stormwater treatment system is not needed was based on the fact that 1) all stormwater samples collected during the 2022 and 2023 events were from locations prior to treatment (i.e., "pre-treatment" samples), and 2) detected chemical concentrations, if exceeding the JSCS SLVs or ROD CULs, were in the lower/flatter portion of the rank-order curve charts, as clarified in the attached report.

Section 1.2 Scope of Work. Please include a full reference to "prior SCE report", as well as references to other plans or reports cited in the SCE Report.

- **Response:** Additional in-text citations have been added. All prior submittals referenced in the report are detailed on the References page at the end of the report.

Section 2.1 Site Location, History, and Description. A description of how the site was used as part of the Sulzer Pump, Inc. operations, and any other owners, should be included in this section.

- **Response:** Section 2.1 has been expanded to include additional background information. Available information suggests that in the mid-to-late 1980s, Sulzer acquired the property and began metal fabrication, machining, pump testing, and painting operations, which continue on the Sulzer property to the west of the Dolan site.

Section 2.1 Site Location, History and Description. A detailed description of the stormwater system should be presented. Expand to include relevant info, such as details and layout of the stormwater management system, drainage basins, outfalls that CBs drain to, observations during storm events as summarized in the January 2021 Supplemental Stormwater Source Control Evaluation Work Plan, etc.

- **Response:** A new Section 2.2 has been added to describe the site stormwater system.

Section 2.2 Previous Environmental Activities and Data Summary. This section should be expanded to include more detail on environmental work completed at the site prior to 2022, including how representative samples were collected for each drainage basis, the timing of any source control work with respect to sampling events, references to relevant reports/plans, and discussion of stormwater/solids data that was collected.

- **Response:** The section was renumbered as Section 2.3. Additional information is now provided that describes various SCEs and other environmental work completed by MFA and others, and the results of that work. Additional historical information is provided in a new Appendix A.

Section 2.2 Previous Environmental Activities and Data Summary. Please provide specific sample names and where they were collected (i.e., post-Clarus system[effluent] versus pre-system [influent]. A discussion of post-system versus pre-system samples should be included here and as a line of evidence in the source control section and to support by-passing the Clarus system.

- **Response:** Additional information regarding pre- and post-treatment samples has been added, as has an additional row in Table A-8 (formerly Table 2-1) to clarify the sample location of each sample related to the treatment system. All samples collected during the 2022/2023 events are pre-treatment samples.

Section 3.0 Potential Sources and Contaminants of Interests. This section should provide historical context and rationale on how COIs were determined for the latest testing, including the initial list of COIs dating back to Sulzer ownership, and the basis for eliminating COIs as the SCE progressed. The text should account for all Portland Harbor ROD Table 17 COCs not included in the latest testing rounds. See related comment #10 below.

- **Response:** Section 3 added to address comment. In summary, GeoDesign evaluated the initial COIs dating to the Sultzer ownership. In a 2006 Supplemental SCE Report, GeoDesign reduced the list of COIs to pH, TSS, diesel and oil range petroleum hydrocarbons, total oil and grease, total metals (for aluminum, cadmium, copper, lead, manganese, mercury, silver, and zinc), PAHs and phthalates, and PCBs in stormwater and total organic carbon, PCBs, PAHs, total metals (aluminum, cadmium, copper, lead, manganese, mercury, silver, and zinc), and grain size analysis for catch basin sediments. GeoDesign identified the applicable site COIs as metals, PCBs, PAHs, phthalates, and VOCs, per their 2015 SCE Report. In March 2017, MFA proposed to reduce the COIs for the site based on historical sampling data, as documented in the Final Stormwater Source Control Evaluation Work Plan. The COIs remaining for the site were total metals, PCBs, PAHs, and phthalates. Additional stormwater sampling conducted in 2017 were

used to further eliminate PCBs and reduce the other analyte list to total arsenic and copper (in Basin C/D), total cadmium and zinc (in Basins E and F), and PAHs, BEHP, and TSS for all basins. DEQ approved the reduction of COIs via email in June 2021.

Section 4.1 Storm conveyance system maintenance. Additional detail on the amount of solids observed in catch basins and lines should be provided. Any data collected to support disposal of the solids should be provided. Please clarify what "pump maintenance" refers to.

- **Response**: Information on the amount of materials removed from pipes and basins is not available. River City vacuumed the sediment out of the pipes and basins and utilized the analytical data collected from our sampling events (see Section 5.2.1) to characterize material for dispose with other collected sediments.
- It is our understanding that a pump in the system had an operational issue. As part of system maintenance the pump was assessed and repaired or replaced as needed to continue system operations. MFA understands the pump is part of the system to convey water to the Clarus system.

Section 4.2 Stormwater sample collection. Please provide a reference to the corresponding work plan. Provide more detail on sample collection method and location with respect to catch basin filters.

- **Response:** Stormwater collection is in accordance with the Final Stormwater Source Control Evaluation Work Plan dated March 29, 2017. The work plan does not discuss location of catch basin filters. To collect influent stormwater at each catch basin (CB-14 and CB-15 in Basin E, and CB-16 in Basin F) the grate and filter are removed from the basin, and the sample container is lowered into the basin by hand to allow for flow coming over the lip of the basin to enter the container. As noted in the work plan, Basin E samples are a 50% composite from each of the two catch basins. Graduated markings on the sample containers allow for equal compositing between catch basins. Discussion of this process has been added to Section 2.3.4.

Section 4.2 Stormwater sample collection. Please indicate which storms meet DEQ's criteria and if any meet the criteria for first flush.

- **Response:** Clarifying statements have been added to Sections 4.3.1, 4.3.2, and 4.3.3.

Section 5.1 Analysis Performed. List TSS analysis and discuss results in data evaluation section.

- **Response:** Added to Sections 5.1, 5.2, and 5.3.

Section 6 Conclusions. BMPs, including periodic catch basin cleanouts and sweeping, are needed to maintain source control. What mechanism will ensure these measures will be completed and documented going forward?

- Response: The Dolan's have an ongoing contract with a service provider to conduct monthly sweeping and semi-annual assessment and changing of catch basin inserts. The Dolan's will maintain records of these activities and can provide them to DEQ upon request.

Section 6. Conclusions. The recent sampling was limited to a focus list of COIs. The report needs to be revised to include sufficient information to make a SCD on all Portland Habor and site-specific COIs. This information may be presented in previous submittals but needs to be included in a final SCE Report to support the development of a proposed SCD for the site.

- Response: Information was presented in prior reporting. The information previously presented was added in Section 2 and 3, and Appendix A to support the focused COIs for the 2022/2023 sampling.

Figure 1-2. Add the "CWTS" sample location and UST sample location.

- Response: Clarus Stormwater Treatment System was already labeled on Figure 1-2. Added "(CSWTS)" to the figure and a red highlight at the location of the sample port.

Table 5-1. Replace "OUTFALL E" with catch basins sampled to form the stormwater sample.

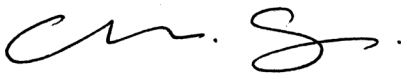
- **Response:** The Table has been renumbered 5-2. "OUTFALL E" in the table is the sample ID used on the chain of custody and field sampling sheets. To address concerns, we have added an additional row to the table to indicate the sample location, in this case CB-14/CB-15.

Appendix C. Add TSS curve.

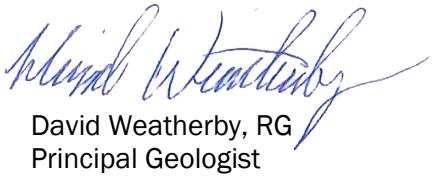
- **Response:** Appendix has been reordered and is now labeled Appendix F. TSS curve has been added to the appendix.

Sincerely,

Maul Foster & Alongi, Inc.



Chris Clough
Project Environmental Scientist



David Weatherby, RG
Principal Geologist

Enclosure

Final Source Control Evaluation Report, Dolan Property