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AECOM Project No. 60733311

Mr. Jeff K. Schatz, R.G.
Project Manager
NWR Cleanup Section
Department of Environmental Quality
700 NE Multnomah Street
Suite 600
Portland, Oregon 97232

Subject: Response to Comments
2025 Upland PCB Assessment Report
Seaport Midstream Partners Portland Terminal
9930 NW Saint Helens Road
Portland, Oregon 97231
DEQ No.: WMCVC-NWR-00-16
ECSI No.: 1528

Dear Mr. Schatz,

On behalf of Seaport Midstream Partners (SMP) and BP Remediation Management and its affiliates (collectively BP), AECOM is submitting this letter in response to the letter received from the Oregon Department of Environmental Quality (DEQ) on August 27, 2025, following the review of the *2025 Upland PCB Assessment Report* (PCB Assessment Report) dated July 31, 2025.

The PCB Assessment Report presents results of field work conducted in response to DEQ's request to investigate upland site conditions following detections of elevated concentrations of PCBs in subsurface sediment adjacent to Lower Tieback 09 at the SMP Portland Terminal facility (Terminal). The DEQ letter contains comments from DEQ that were agreed upon by EPA and the Five Tribes.

A total of 8 comments were received; each is presented below in italics, with responses in regular text.

General Comments

1) *DEQ generally concurs with the conclusions of the PCB Assessment Report that, within the investigation area, impacts are limited to the vicinity of boring SB-03 and there are no indications of a facility-related PCB source at the SMP terminal property. If fill of unknown origin historically placed at the terminal property is the likely source of PCBs detected in soil at SB-03, considering the affinity of PCBs to associate with petroleum hydrocarbons, it should be acknowledged that a well-functioning Sheet Pile Wall SCM is essential to preventing riverward transport of PCBs (i.e., where present) and possible recontamination of the Portland Harbor Superfund Site (PHSS) remedy. DEQ is not requesting further evaluation of PCBs in the upland portion of the terminal at this time. However, in the event of future petroleum releases known (or suspected) to impact sediments riverward of the Sheet Pile Wall SCM, the condition of tieback anchors proximate to the release should be assessed as soon as practicable and sediment samples collected from the in-water area proximate to such releases should be analyzed for total PCBs as congeners by EPA Method 1668A.*

   Response: We appreciate DEQ's interest in potential future actions and acknowledge this request. In the event of a petroleum release known or suspected to impact sediments riverward of the Sheet Pile

Wall SCM, planning would be initiated for a tieback anchor inspection event. This inspection event would be focused on the area proximal to the release and would include visual observations of tieback anchors and collection of sediment from the in-water area for laboratory analysis.

Specific Comments

2) *Section 2.2.1 Groundwater Sampling. Although documented in handwritten field notes included as an appendix to the PCB Assessment Report, this section should briefly discuss the range of groundwater depths measured in the wells during the initial gauging prior to purging and sampling.*

   Response: Initial depth to groundwater in MW-17 and P-24 has been added to Section 2.2.1.

3) *Section 3.2 Soil PCB Results. DEQ concurs with the results of screening the analytical results for total PCBs against the PHSS cleanup level (CUL) of 9 micrograms per kilogram (µg/kg), site-wide remedial action level (RAL) of 75 µg/kg, and principal threat waste (PTW) level of 200 µg/kg. EPA regional screening levels (RSLs) for total PCBs in soil in an industrial setting are not applicable to source control and such references should be removed from the PCB Assessment Report. Comment also applies to Section 3.3.*

   Response: References to EPA RSLs have been removed from Section 3.2 Soil PCB Results, Section 3.3 PCB Assessment Conclusions, and Section 5.0 References.

4) *Section 3.3 PCB Assessment Conclusions. DEQ agrees that, with the Sheet Pile Wall SCM in place and functioning, there is little potential for "direct contact" with soils impacted by PCBs. The report further states that a current pathway for transport of the soil-bound PCBs observed in boring SB-03 to the PHSS was not identified. While generally insoluble in water, PCBs can readily dissolve in solvents, oils, and fats. It is not a coincidence that during the 2023 tieback inspections, significant petroleum hydrocarbon contamination was noted in the excavation for lower tieback anchors 9 and 10. DEQ acknowledges that the leaking tieback anchors at this location were repaired and no longer provide a migration pathway for petroleum-impacted groundwater to reach Willamette River sediments. However, PCB-impacted fill may have been placed at other locations at the SMP terminal, and not all tieback anchors were observed during the 2022 and 2023 investigations (i.e., the condition of the remaining tieback anchors is not known). Please revise the conclusions to acknowledge this potential mechanism for recontamination and discuss the associated uncertainty.*

   Response: During the tieback inspection work completed in January 2022 (AECOM, 2022a)[1] and August/September 2023 (AECOM, 2024a)[2] select tieback locations were exposed for visual inspection and assessment. The tieback locations of interest were established by collaboration between SMP and DEQ, as documented in the *Revised Additional Action Work Plan* (AECOM, 2022b)[3], and the *Revised 2023 Tieback Inspection Work Plan* (AECOM, 2023)[4]. As the data gathered during these investigations focused on the collaboratively selected tiebacks, conclusions regarding the remaining tiebacks are reserved at this time.

5) *Figure 3 Soil Boring and Well Sampling Locations. Owing to the scope and extent of response actions associated with the December 2021 petroleum sheen event, please revise this figure to include at least the visible portion of the January 2022 excavation to expose lower tieback anchors 17-20, located adjacent to the area of petroleum sheening riverward of the sheet pile wall and well SC-04.*

[1] AECOM, 2022a. *Seawall Maintenance Construction Completion Report. Revision 1.* Prepared for Seaport Midstream Partners, LLC for the Portland Terminal, Portland, Oregon. May 9, 2022
[2] AECOM, 2024a. *Seawall Tieback Inspection Summary Report.* Prepared for Seaport Midstream Partners, LLC for the Portland Terminal, Portland, Oregon. January 9, 2024
[3] AECOM, 2022b. *Revised Additional Action Work Plan.* Prepared for Seaport Midstream Partners, LLC for the Portland Terminal, Portland, Oregon. October 17, 2022
[4] AECOM, 2023. *Revised 2023 Tieback Inspection Work Plan.* Prepared for Seaport Midstream Partners, LLC for the Portland Terminal, Portland, Oregon. April 7, 2023

Response: Approximate excavation extent from the 2022 inspection of tieback anchors 17-20 has been added to Figure 3. Also note that an aerial image depicting all tieback inspection locations is included in the *2023 Additional Action Summary Report* (AECOM, 2024b)[5].

6) *Figure 4 Cross Section A-A'. Please revise the cross section to reflect the following:*

a. Approximate location and depth of sediment samples TP01-TB09 and TP01 as shown in Figure 3

Response: Note that samples were collected from station TP01 at two different depth intervals. The approximate locations of samples TP01-TB09, TP01-4.0-5.0, and TP01-1.5-2.5 have been added to Figure 4, using the colors corresponding to the total PCB concentration measured in each of the three samples.

b. Average elevation of groundwater in the shallow groundwater zone (SGZ)

Response: Water level gauging was completed in MW-17 and P-24 during this effort; a depiction of the average groundwater elevation of these two wells has been included in Figure 4.

c. Location of stormwater line riverward of boring SB-04

Response: An approximate location of the stormwater pipe riverward of boring SB-04 has been added to Figure 4. Note that its depth is estimated.

d. Vertical exaggeration of the cross-section

Response: Vertical exaggeration (x1) has been noted on Figure 4.

7) *Figure 5 Cross Section B-B'. Please revise the cross section to reflect the following:*

a. Average elevation of groundwater in the SGZ

Response: Water level gauging was completed in MW-17 and P-24 during this effort; a depiction of the average groundwater elevation of these two wells has been included in Figure 4.

b. Vertical exaggeration of the cross-section

Response: Vertical exaggeration has been added to Figure 5.

8) *Table 4 Soil Analytical Results. Please remove the lowermost colored row in the table heading containing the reference to EPA RSLs for industrial soil. See also Specific Comment 3.*

Response: The row referencing EPA RSLs has been removed from Table 4 Soil Analytical Results.

If you have any questions regarding this letter response, please contact Thomas Bialobok (AECOM) at 713-213-6355.

Sincerely,

Thomas J. Bialobok
Senior Project Manager

Christina Wheeler, PhD
Project Chemist

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[5] AECOM, 2024b. *2023 Additional Action Summary Report.* Prepared for Seaport Midstream Partners, LLC for the Portland Terminal, Portland, Oregon. March 28, 2024