



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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October 17, 2023

sent via email

Deborah Taege
The Boeing Company
EHS Remediation
Bldg. 10-20, MC 9U4-26
800 N 6th Street
Renton, WA 98055-1409

RE: 2022 Annual Progress Report, Troutdale Gravel Aquifer, Boeing Portland Facility, Gresham, Oregon. ECSI #13

Dear Ms. Taege:

The Oregon Department of Environmental Quality (DEQ) has reviewed the document entitled *2022 Annual Progress Report, Troutdale Gravel Aquifer, Boeing Portland Facility, Gresham, Oregon* dated March 21, 2023. This report was prepared on your behalf by Landau Associates' Seattle office.

DEQ approves the 2022 Annual Progress Report with the following comments on Section 6.0, Recommendations:

DEQ approves the recommendation for decommissioning Extraction Well E-11, which is irreparably plugged from injected remediation reagents.

DEQ approves all of the recommendations for Groundwater Monitoring Wells with the exception of:

Do not discontinue elevation measurement and sampling of all Upper TSA monitoring wells within the TGA Remedy area. Per the project Consent Order, monitoring for potential downward migration of VOCs from the TGA to the Upper TSA is a required element.

The Upper TSA gauge measurements and groundwater quality data remain important to evaluate the potential for downward movement of VOCs from the TGA to the TSA. Potential downward movement of VOCs is important to consider as extraction wells are taken offline and decommissioned.

A No Further Action Determination has not yet been made by DEQ for TSA Remedy Zone B. This future NFA may include future discontinuation of this elevation measurement work when approved.

DEQ would consider a focused elevation data collection program that would reduce the overall monitoring burden but maintain sufficient data resolution to evaluate the TGA-TSA potential pathway. At minimum this should include the wells underlying areas of TGA contamination that have historically exhibited a downward vertical gradient.

Please feel free to call me with questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Thiessen', with a stylized, sweeping underline.

Kenneth Thiessen, RG, CEG
Northwest Region Cleanup Section
(503) 887-7636

cc: Erin Waibel, PE, Landau Associates
Jesikah Cavinaugh, EIT, Landau Associates
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ECSI #13