



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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November 12, 2024

sent via email

Jason Hegdahl
Cascade Corporation
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Deborah Taege
The Boeing Company
P.O. Box 2207, M/S 7A-XA
Seattle, WA 98124

RE: Annual Performance Report 1 Jan. – 31 Dec. 2023 and Five-Year Remedy Performance Evaluation, East Multnomah County, Troutdale Sandstone Aquifer Remedy, Gresham, Oregon. ECSI #1479

Dear Mr. Hegdahl and Ms. Taege,

The Oregon Department of Environmental Quality (DEQ) has reviewed the Annual Performance Report for calendar year 2023 and Five-Year Remedy Performance Evaluation, for the East Multnomah County, Troutdale Sandstone Aquifer Remedy. The report is dated July 2024. This report was prepared on your behalf by Geosyntec Consultants, Inc., Landau Associates, Inc. and SS Papadopoulos and Associates, Inc. DEQ approves the document and the Section 7.0 *Recommendations and Future Planned Activities*.

As well, thank you for meeting with DEQ to discuss the recent cVOC and PFAS results of Portland Water Bureau PWB-1 multi-port monitoring well sampling. We look forward to hearing from you on our request for reconnaissance level PFAS sampling in representative project monitoring wells; we respectfully ask that you formally respond to DEQ's request within 30 days of receipt of this letter

DEQ approves the recommended actions in Section 7.2 *Recommended Changes to Monitoring Program and Schedule Modifications* of the July 2024 document (directly quoted below):

- *Decrease monitoring frequency for groundwater elevation and groundwater quality monitoring for Zone C well CMW-10(ds) from quarterly to semiannually. VOC concentrations in this well have been steadily declining since 2010 and are now only slightly above the MCL. Thus, semiannual sampling frequency is sufficient to monitor low-level VOC concentrations.*
- *Discontinue groundwater elevation and groundwater quality monitoring at Zone B and Zone D wells, with the exception of sentinel wells identified for sampling as part of the PWB Contingency Plan. Following the 2022 Annual Report, DEQ requested the continued sampling of wells BOP-20(ds), BOP-20(dg), and BOP-23(dg) to monitor for potential rebound at extraction well EW-23. Groundwater elevation data and TCE concentrations at wells (BOP-20(ds), BOP-20(dg), and BOP-23(dg)) indicate no aquifer rebound almost three years after EW-23 shutdown. Based on this information, we request to discontinue sampling of these three wells as part of the*

routine remedy monitoring program. Wells BOP-20(ds) and BOP-23(dg) are sentinel wells for non-routine monitoring during prolonged PWB operation of the CSSWF, as identified in the PWB Contingency Plan.

- *Following the May 2024 quarterly sampling event, shut off three SVE wells (VMW-H, VMW-C, and VMW-F). Mass removal at these three wells has declined to asymptotic levels. Vapor extraction from the remaining five SVE wells will continue. (DEQ approved this change via email in April 2024).*

From Section 2.1 of the July 2024 document, please retain the following wells in usable condition for possible future sampling while acknowledging that DEQ had previously approved their decommissioning. These wells were not sampled in 2023.

- Zone A: Upper TSA well BOP-44(ds), Lower TSA wells BOP-44(dg) and EMC-2(dg), and SGA well BOP-44(usg);
- Zone B Upper TSA wells BOP-21(ds) and BOP-42(ds) and Lower TSA wells BOP-42(dg) and BOP-60(dg);
- Zone C: Lower TSA wells CMW-8(dg) and CMW-10(dg).

The Portland Water Bureau provided project comments to DEQ titled: *Summary of 2023 Groundwater Quality Impacts at Portland Water Bureau Wells Due to Contaminant Releases by the Boeing Company and Cascade Corporation at the East Multnomah County Site, dated October 1, 2024.* This summary is attached to this letter.

Please feel free to call me with questions.

Sincerely,



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Northwest Region Cleanup Section
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cc: Cindy Bartlett, R.G. Geosyntec Consultants
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ECSI #1479