



Mingus Mapps, Commissioner  
Gabriel Solmer, Director



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April 27, 2021

Kenneth Thiessen RG, CEG  
Oregon Department of Environmental Quality  
Northwest Region Cleanup Program

RE: DEQ Review of: East Multnomah County TSA Groundwater Remedy, Response to DEQ and PWB Comments Received 8/20/2020 on EMC TSA Documents (ECSI 1479).

Ken,

Thank you for the opportunity to comment on the DEQ Review of the East Multnomah County TSA Groundwater Remedy, Response to DEQ and PWB Comments Received on 8/20/2020 regarding EMC Documents (ECSI 1479), and the DEQ Determination to Issue a Conditional Partial NFA. The Portland Water Bureau (PWB), in consultation with GSI Water Solutions, Inc. (GSI), has reviewed the report and prepared the following and enclosed comments for consideration.

The Landau Associates (Landau) Memorandum, dated 02/16/2021, states within Section 6 that “Multnomah County restricts groundwater use and limits installation of any new wells (i.e. private water supply/irrigation).” After consulting with colleagues at Multnomah County and City of Gresham, PWB knows of no local government authority restricting installation of groundwater wells, private or irrigation, within any of the groundwater aquifers in East Multnomah County. PWB feels it is important to note that there are no institutional controls in place by local authorities restricting access to groundwater in the Portland Basin, and particularly, East Multnomah County.

As is discussed within the enclosed technical memorandum, “Concentration Trends in Monitoring Well PWB-1(lts): Review and Reanalysis of a Mann-Kendall Trend Analysis Performed by Geosyntec and Landau (2021)”, PWB notes again that the data suggest that there is an increasing trend in the concentration of TCE in monitoring well PWB-1(lts), and not enough data to determine a trend for TCE concentrations in PWB-1(uts). PWB agrees that if a partial NFA is to be issued, it should be conditioned to continued groundwater sampling at PWB-1(lts) and PWB-1(uts), accompanied by continuing analysis of the data. The analysis should include not only a comparison of concentrations to the MCL (5 µg/l), but also the direction of the trend in TCE concentration and the rate at which TCE concentrations are increasing. The current increasing trend in TCE at PWB-1(lts), as described in the attached memo by GSI, suggests TCE concentrations will exceed MCL in approximately 60 years if the current trend persists in a linear manner.

Additionally, given the apparent changes in trends in recent years as remediation activities have tapered off, PWB suggests that 5 years of additional monitoring may not be enough to determine whether or not TCE concentrations will remain below MCL throughout the duration of the construction window specified for PWB’s water rights in the Columbia South Shore Wellfield,

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which is 85 years. A longer window for annual sampling would provide a more robust data record and more reliable analysis for evaluating TCE concentration trends at both PWB-1(lts), where there is currently an increasing trend, and PWB-1(uts) where recent detections of TCE could indicate an increasing trend. Again, note that 15 years of sample analysis indicated concentrations of TCE were below method detection levels at PWB-1(uts) but they appear to be increasing over the past 3 years, a period too short to conclusively determine a trend.

As the drinking water provider for nearly one quarter of Oregon's population, PWB is concerned about any TCE impacts in the vicinity of its groundwater wells in the TSA and SGA. To that end, and in light of its comments above, PWB urges DEQ to increase the required monitoring and analysis period to a duration sufficient to confidently determine decreasing or stable TCE concentration trends below the MCL for the remainder of the 85 year construction window of PWB's water right. PWB welcomes any additional comments or questions on these comments. Please direct technical questions and concerns regarding these comments to me.

Sincerely,

A handwritten signature in black ink, appearing to read "Dahl", with a long horizontal stroke extending to the right across the top of the signature.

Jack Dahl, PE  
Acting Hydrogeologist  
Portland Water Bureau

Encl: GSI Technical Memorandum: Concentration Trends in Monitoring Well PWB-1(lts): Review and Reanalysis of a Mann-Kendall Trend Analysis Performed by Geosyntec and Landau (2021).

cc: Doug Wise, PWB  
Matt Kohlbecker, GSI