



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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April 2, 2021

sent via email

Jack Dahl, P.E.
Portland Water Bureau
1120 SW 5th Ave.
Portland, OR 97204

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

Dear Mr. Dahl,

The Oregon Department of Environmental Quality (DEQ) has reviewed the document entitled *East Multnomah County TSA Groundwater Remedy, Response to DEQ and PWB Comments Received 8/20/2020 on EMC TSA Documents (ECSE 1479)*, dated February 16, 2021. The document was prepared by Geosyntec Consultants and Landau Associates on behalf of Boeing and Cascade Industries, to addresses DEQ and PWB comments on their request for regulatory closure of a portion of the East Multnomah County site.

DEQ appreciates the Portland Water Bureau and GSI responses to the documents proposing regulatory closure of Zone A of the East Multnomah County Troutdale Sandstone Aquifer Remedy (EMC TSA) project. Zone A is the portion of the groundwater remediation project that lies north of both Sandy Boulevard and the Boeing and Cascade Industries facilities. The 2021 document is attached to this letter for your records.

In reviewing the February 16 response to comments, DEQ took into consideration 2020 groundwater analytical data for trichloroethene (TCE) from the PWB-1 nested well set that you recently provided.

For Zone A, DEQ has determined that the EMC TSA project meets the requirements of the Record of Decision for this project. The 2021 response document satisfactorily addresses the remaining concerns of DEQ for this regulatory closure consideration. We understand PWB concerns about such a decision given the continued low-level detections of TCE at the PWB-1uts and PWB-1lts wells located near the northern extent of Zone A. [Most recently TCE was detected at 1.45 ug/L and 1.21 ug/L in PWB-1(lts) and PWB-1(usg), respectively, in 2020 sampling]. In consideration of ongoing, low-level detections, DEQ will specify that these wells will continue to be sampled and analyzed for VOCs including TCE, with data screened against the EPA MCL of 5.0 ug/L as required in DEQ's 1996 ROD. If semi-annual/annual sampling is not completed by the PWB at PWB-1, DEQ will require that it be completed by Boeing/Cascade on at least an annual basis for a period five years. After this time, the need for additional sampling will be determined by DEQ.

Based on successful restoration of groundwater quality in the EMC TSA Zone A including the underlying SGA, a Conditional/Partial regulatory closure is recommended by DEQ for Zone A. The conditions will include continued monitoring of the PWB-1 well set and the Partial designation refers to the

recommendation limited to Zone A. Active remedial measures will continue in other Zones of the EMC Site until Consent Order criteria are met.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Thiessen', with a stylized, sweeping flourish at the end.

Kenneth Thiessen, CEG
Northwest Region Cleanup Section

cc: Paul Seidel, DEQ
Dan Hafley, DEQ
Doug Wise, Portland Water Bureau
ECSI #1479

Attachment: Geosyntec Consultants, Landau Consultants. February 16, 2021. *East Multnomah County TSA Groundwater Remedy, Response to DEQ and PWB Comments Received 8/20/2020 on EMC TSA Documents (ECSI 1479).*