



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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November 23, 2022

sent via Email

Jason Hegdahl
Cascade Corporation
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Fairview, Oregon 97024

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

RE: Annual Performance Report for 1 Jan. – 31 Dec. 2021. East Multnomah County, Troutdale Sandstone Aquifer Remedy. Zones B and D Closure Requests. ECSI #1479

Dear Mr. Hegdahl and Ms. Taege,

The Oregon Department of Environmental Quality (DEQ) has reviewed the Annual Performance Report for calendar year 2021, for the East Multnomah County, Troutdale Sandstone Aquifer Remedy project. The report is dated May 6, 2022 and was received at DEQ on June 9, 2022. This report was prepared on your behalf by Geosyntec Consultants, Inc., Landau Associates, Inc. and SS Papadopoulos and Associates, Inc. DEQ previously approved the project recommendations as proposed in report Sections 6.1 through 6.3 in a letter dated August 30, 2022.

This letter approves the additional recommendations proposed in Section 6.4, to proceed with regulatory closure for Remedy Zones B and D. Active remediation continues in Remedy Zone C.

6.4 Partial NFA and Zone Closure Requests

DEQ has reviewed the data supporting the request for regulatory closures of Remedy Zones B and D and agrees that closure is warranted. Many of the wells located in Remedy Zones B and D have either been decommissioned previously or are slated for decommissioning using the project Remedy Well Network Criteria (Table 2-1, 2021 annual report). All wells sampled in Remedy Zones B and D have consistently contained trichloroethene (TCE) at less than the project clean up goal of 5 µg/L for several years. In all cases exceeding the prescribed minimum time required by the Remedy Well Network Criteria for the project. The exception to this is for monitoring well CMW-26ds in the eastern portion of Zone D which was damaged by others during site redevelopment in 2020. The final sampling events of CMW-26ds, prior to its destruction, had TCE concentrations of 6.27 and 6.51 µg/L, which are above the project clean up goal of 5 µg/L. DEQ approved not replacing this well as other wells remained in sentinel positions closer to the TCE release locations.

In Zone A, two wells, BOP-65ds and EW-13 are sampled for water quality and are gauged for depth to water in conjunction with nearby municipal wellfield pumping operations. When nearby Rockwood PUD and Portland Water Bureau municipal wells are operating, the depth to water in these wells lowers by about 5 feet, indicating some hydraulic communication between the Troutdale

Sandstone Aquifer and the underlying Sand and Gravel Aquifer, which is typically utilized for municipal groundwater supply in this area. The most recent TCE concentrations in these wells are 0.25 µg/L and ND<1.0 µg/L, respectively. These wells will remain available for sampling and gauging into the future.

Please assist DEQ by preparing a project completion report that can be used as the basis for a NFA Staff Report for Zones B and D. This NFA Staff Report for Zones B and D document will require a public review and comment period prior to finalizing.

Please feel free to call me with questions.

Sincerely,

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

Kenneth Thiessen RG/CEG
Northwest Region Cleanup Section

cc: Cindy Bartlett, R.G. Geosyntec Consultants
Christine Kimmel, P.G. Landau Associates
Charles Andrews, Ph. D., S.S. Papadopoulos & Assoc., Inc.
Dan Hafley, RG, DEQ NW Region
Doug Wise, Portland Water Bureau
ECSI #1479