



Oregon

Kate Brown, Governor

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September 30, 2015

Scott Baker
Aircraft Services International Group
8133 NE Air Trans Way
Portland, OR 97218

RE: Summary Report of ASIG's Taxiway F (ECSI 2240/5849) and South Cargo Reload Rack Portland International Airport (ECSI # 5524)

Dear Mr. Baker:

DEQ has completed its review of the *Summary Report* prepared for the Aircraft Service International Group (ASIG) Taxiway F and South Cargo Reload Rack at the Portland International Airport, dated March 31, 2014. This report was written on your behalf by Advanced Remediation Technologies, Inc. (ART). We have a number of comments on the report which are presented below for your consideration. Data deficiencies identified by DEQ must be addressed before a no further action decision can be considered for the site.

General comments:

1. The Summary Report recommends that DEQ provide a No Further Action determination based on the brief Summary Report. However, the summary document does not provide adequate information for DEQ to support this recommendation at this time.
2. Delineation of the jet fuel plume is based on 19 hand borings, 24 Geoprobe borings, 9 monitoring wells and 10 recovery wells. Of these data points, only groundwater analytical data are presented from the monitoring wells. Please provide *all* soil and groundwater data in a revised summary report. Also, a data CD submitted to DEQ, provided groundwater monitoring well data from five events during 1999 and 2000 but did not provide additional plume definition data.
3. From the plume map (Fig 4 of the Summary Report) it appears that most of the contamination plume is beneath pavement or concrete however, three areas within the plume have soil at the surface and should be considered a potential risk for occupational worker exposure and screened against DEQ risk-based concentrations (RBCs).
4. Field notes from previous site work (References section) indicated that residual contamination was typically concentrated in soils about three feet below the ground surface. This proximity to the ground surface make the direct contact (occupational or excavation worker) and volatilization to outdoor air pathways (occupational worker)

potentially complete pathways. Please address these pathways in a revised summary report.

5. Figure 4 indicates that the Jet A plume underlies a portion of the UPS Package Sorting Building. The Vapor Intrusion into Buildings pathway for Occupational Workers pathway must be considered in evaluation of risk for the site. Provide data on volatile constituents in the contaminant plume, including but not limited to, benzene and naphthalene.
6. Please provide definitions and labels for symbols used on Figure 4 (utilities, borings, monitoring wells, product recovery wells).
7. Discuss the extent of storm sewer pipe relining at the site. About 700 linear feet of storm sewer pipe are located within the mapped plume as illustrated on Figure 4. Please indicate the relined portions of the storm sewer system in the contamination plume area on a revised site map.
8. Residual contaminants in soil and groundwater downgradient of the pipeline leak may remain elevated above RBCs for relevant exposure pathways; however, site data is not presented to allow this assessment to be made. Please provide data used to characterize and delineate the contaminant plume to allow DEQ to make an accurate assessment of risk from residual contamination.

Closing:

After review of a revised summary report addressing the data deficiencies noted above, DEQ will determine whether a No Further Action determination for this site, including institutional and engineering controls, is appropriate.

The Summary Report indicates that the plume area (up to 300 by 1000 feet) may contain near-surface, residual contaminants exceeding relevant RBCs. Complete pathways to occupational, construction and excavation workers appear to be present or potentially present. This plume area must be added to the *Airport Layout Plan* for the Portland International Airport to guide future site work.

I can be reached at (503) 229-6015 or Thiessen.Kenneth@deq.state.or.us with questions.

Sincerely,

Kenneth Thiessen, CEG
Northwest Region Cleanup Section



Distribution:

Lance Downs, ART
Stan Jones, Port of Portland
Dan Hafley, DEQ NWR
Keith Johnson, DEQ NWR
ECSI #2240/5849 & ECSI #5524

References:

ART, 2000. Spring 2000 Semi-Annual Groundwater Monitoring at South Reload Facility and Transmission Line, Portland International Airport, Portland Oregon. June 27, 2000.

ART, 2000. Fall 2000 Semi-Annual Groundwater Monitoring at South Reload Facility and Transmission Line, Portland International Airport, Portland Oregon. November 9, 2000.

IT Group, 2000. Fall 1999 Semi-Annual Groundwater Monitoring at South Reload Facility and Transmission Line, Portland International Airport, Portland Oregon. April 28, 2000.

IT Group, 1999. Spring 1999 Semi-Annual Groundwater Monitoring at South Reload Facility and Transmission Line, Portland International Airport, Portland Oregon. September 24, 1999.

EMCON, 1998. Third Quarter 1998 Groundwater Monitoring at South Reload Facility and Transmission Line Area, Portland International Airport, Portland Oregon. December 28, 1998.