



Oregon

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via electronic delivery (email)

David Breen
Port of Portland
PO Box 3529
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Re: Basin 1 Environmental Management Plan
Portland International Airport
ECSI # 3324

David:

DEQ Cleanup reviewed the *Basin 1 Subarea Stormwater Improvements Project – Environmental Management Plan* prepared by Maul Foster Alongi on behalf of the Port of Portland and dated October 24, 2025. Our comments on the document are presented below. The document was prepared to as a follow-up to submission a draft document on June 25, DEQ comments dated August 25, and a subsequent meeting. Please submit a revised (final) document through Your DEQ Online (YDO) for final review and approval.

General Comment #1. In the “cover letter”, please clarify elements of work that are covered by the MFA submittal, and those that will be the responsibility of the contractor and addressed in future submittals. It appears that most elements of contaminated media management are addressed by the MFA submittal and attachments (notably the CMMP and Groundwater Treatment Plan as Attachments A and C), but some elements will be the responsibility of the contractor. For example, Attachment C states that a construction dewatering plan will be prepared by the contractor (and presumably shared with DEQ). Presumably, the contractor will also be developing a Health and Safety Plan, of particular importance given the high concentrations of contaminants that may be encountered in parts of the work area. Also, potentially a work plan or protocols for additional soil characterization? Please clarify.

General Comment #2, various elements.

- Include a section that describes the schedule, including the proposed start date and duration of the planned work.
- Please renumber the tables to be in consecutive order, there are currently three tables called Table 1.
- Please include a figure to accompany the soil sample tables showing the locations cited in the tables, including the following, SC-01, SC-02, B-1, B-4, B-7, B-8, B-10.

- Add additional description to the CMMP to describe the additional measures that will need to be taken during pipe replacement (former fire training areas) and pipe installation (Ditch A) to prevent the release of contaminated in-place soil, sediment, or groundwater into storm drainage system infrastructure, the point of discharge being Columbia Slough. We would expect the EMP to discuss, for example, use of check dams or sediment traps to prevent contaminated sediment being released during work to ensure protection of the Slough.
- On August 28, 2025, as we discussed, DEQ’s preference for reuse of materials that are above occupational screening levels but below the target removal levels, is to use these materials in areas below hardscape or clean fill to the extent practicable.

Section 5.2. Petroleum NAPL has been historically observed in the former fire training area. Please discuss whether you expect it to be encountered, as if so, how it will be managed. If groundwater is encountered with either NAPL or sheen, will it be segregated or processed through the groundwater treatment system?

Section 5.3

- Identify the estimate volumes of soil that will be a) reused or b) disposed of off-site based on the alignment “coloration” presented in sheets C-1.02 and -1.03 in Appendix B. Also, identify any constraints that will be imposed on soil reuse. For example, DEQ recommends that soil with contamination not be placed deeper than original depth, and/or in direct contact with the water table.
- Identify the removal threshold used (10x vs. 100x) for soil. In Section 5.3.2, please discuss when additional sampling will be completed. Is this the responsibility of the construction contractor? Information in this section is insufficient for DEQ to know whether characterization will be adequate for assessing contaminant conditions and appropriateness of reuse.

Section 8. Identify the party that will complete the reporting (Port or contractor?).

Exhibit X. Please add a label for PDX Fuel Facility to provide a reference point between Exhibit X and the C-1.01 figures. Exhibit X Figure should include the sample locations for all of the locations included in the tables for GW results, including wells, MW-11, MW-12, and sample locations B-4 (Tables 5-8) and EB-030725 (Table 8; note this location doesn’t have a sample location, only an ID in the table).

Groundwater, Tables 5-7. These values should be screened against RBC, Groundwater in Excavation values for Construction & Excavation Worker values, like the screen performed in “Table 1” – for MW-8, MW-11, and MW-12. (Note: Please rename Table 1 to be an individual number).

Soil PFAS, Tables 4, and “Table-1”. Please screen the soil concentrations in these tables against EPA’s RSLs for Occupational (Note: Please rename Table 1 to be individual number).

Groundwater PFAS, Table 8. Please screen GW PFAS constituents against the EPA MCLs.

Appendix E. Please amend the screening table to incorporate the specific details discussed during our call on August 28, 2025, as follows:

- Leaching to GW is based on RSL hot spots, using a factor of 60, only should be based on a factor of 20 to account for the overall area of the work.
- DEQ's preference is for that material to be reused below hardscapes, to the extent possible, when the soil that is over occupational RBCs and below the targeted removal levels (highlighted orange in this table) – so please highlight any concentrations that are above the RBCs so it is more evident these areas of soil are present at the Site. Long-term and from a risk perspective (post-construction), it is DEQ's expectation that soil with concentrations of PFAS or other contaminants exceeding occupational screening values will require capping or other protective measures.

Please contact me or project engineer Heidi Nelson if you have questions or comments.

Sincerely,



Daniel Hafley, Hydrogeologist
Northwest Region Cleanup Section

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Anzie St. Clair, Port of Portland
ECSI# 3324 File