

## MEMORANDUM | November 10, 2025

**TO** Jeff Schatz and David Lacey, Oregon Department of Environmental Quality (DEQ)

**FROM** Peter Shanahan, HydroAnalysis LLC (HALLC); Jennifer Hart and Gail Fricano, Industrial Economics, Inc. (IEc)

**SUBJECT** Five Tribe review of “Basin K1 Bioinfiltration Basin Annual Report, Kinder Morgan Port of Portland Terminal 4 Slip 3,” dated September 30, 2025

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This memorandum, submitted on behalf of the Five Tribes,<sup>1</sup> reviews the *Basin K1 Bioinfiltration Basin Annual Report, Kinder Morgan Port of Portland Terminal 4 Slip 3* prepared by Maul Foster & Alongi, Inc. on behalf of Kinder Morgan Bulk Terminals, Inc. (Maul Foster & Alongi 2025). We also reviewed DEQ’s draft comments on the report (DEQ 2025).

### Comment

We share the concern raised by DEQ’s Specific Comment #1, that elevated pH may make it inappropriate to discharge stormwater to the Willamette River. We would add that total dissolved solids (TDS), due primarily to sodium, will also be elevated and may locally exceed the applicable stream standard of 100 milligrams per liter. Infiltrated stormwater will travel through groundwater, eventually reaching the River, without appreciable attenuation of TDS. Therefore, we recommend that both the pH and specific conductance of the stormwater be measured in order to evaluate these characteristics and determine whether the stormwater is suitable for discharge.

### References

Maul Foster & Alongi, Inc. (Maul Foster & Alongi). 2025. Basin K1 Bioinfiltration Basin Annual Report, Kinder Morgan Port of Portland Terminal 4 Slip 3, Kinder Morgan Port of Portland Terminal 4, Slip 3. Prepared for Kinder Morgan Bulk Terminals, Inc. September 30.

Oregon Department of Environmental Quality (DEQ). 2025. Draft letter to Kelly Madalinski, Port of Portland, RE: Basin K1 Bioinfiltration Basin Annual Report (Year 4). October 27.

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<sup>1</sup> The five tribes are the Confederated Tribes of the Grand Ronde Community of Oregon, the Nez Perce Tribe, the Confederated Tribes of Siletz Indians, the Confederated Tribes of the Umatilla Indian Reservation, and the Confederated Tribes of the Warm Springs Reservation of Oregon.

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