From:	MCDONNELL Erin K * DEQ
To:	Leisle, Dwight
Cc:	GREENFIELD Sarah * DEQ; LACEY David J * DEQ; Steve Misner; Alison Clements; Herb Clough
Subject:	RE: Port of Portland - Willamette Cove - Draft Riverbank Soil Reuse Characterization and Upland Receptor Screening Work Plan
Date:	Friday, May 30, 2025 1:56:00 PM
Attachments:	image001.png image004.wmz image007.wmz image005.png image006.png

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Hi Dwight and Alison,

DEQ has reviewed the *Riverbank Soil Reuse Characterization and Upland Receptor Screening Addendum*, provided March 13, 2025, via email.

- In general, it would be helpful to have the results of the in-water project riverbank composite samples to facilitate review of this Addendum. Given which transect samples to include in the final composite samples is subject to change based on the in-water project results, please confirm your current approach. It would also be helpful to have a better understanding of the thought process to carry forward (or alternatively exclude) compositing samples collected at specific transects (currently proposed at 13 through 18) for additional analysis.

- Please clarify what is intended by references to “ISM protocols” for the composite samples. For example, sample design and/or sample processing?

- The Addendum concludes that if the chemical results are less than remediation goals, the soil will be suitable for onsite reuse. DEQ does not fully agree with this statement but rather the data results can be used to support an evaluation of the potential suitability for reuse for planning during design. Potential reuse of soil is subject to DEQ’s approval once the actual reuse volumes, soil management protocols, and verification approach are determined in design.

DEQ generally approves implementing this scope of work proposed in the Addendum; however, conditional on that the Addendum is a “pre-screening” strategy to evaluate potential reuse as an option in the uplands. It is DEQ’s expectation that a more comprehensive soil sampling plan for potential placement in the upland will be necessary and developed further along during the remedial design process.

Sincerely,
Erin

Teleworking Tuesday through Friday. Off Mondays.

From: Leisle, Dwight <Dwight.Leisle@portofportland.com>
Sent: Thursday, March 13, 2025 3:10 PM
To: MCDONNELL Erin K * DEQ <Erin.K.MCDONNELL@deq.oregon.gov>
Cc: GREENFIELD Sarah * DEQ <Sarah.GREENFIELD@deq.oregon.gov>; LACEY David J * DEQ <David.J.LACEY@deq.oregon.gov>; Steve Misner <steve.misner@apexcos.com>; Alison Clements <Alison.Clements@oregonmetro.gov>; Herb Clough <HClough@ApexCos.com>
Subject: RE: Port of Portland - Willamette Cove - Draft Riverbank Soil Reuse Characterization and Upland Receptor Screening Work Plan

Hi Erin,

Attached is a table containing our responses to your comments below. The attachment also includes an Addendum to the Draft Riverbank Soil Reuse Characterization and Upland Receptor Screening Work Plan that lays out our proposed plan for analysis of the collected discrete samples from the removal layer. The requested figures are included as attachments to the Addendum.

Please review the attached and let us know if you have any additional questions or concerns. We expect to see the WC Group's composite results in the next several weeks. Once we have those results, we hope to move forward with the discrete sampling plan, with your approval, and the rest of the upland receptor screening.

Thanks,

Dwight

Dwight Leisle PE, PMP
Environmental Program Manager
Port of Portland
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T 503-415-6325 F 503-548-5525 C 360-434-0201

From: MCDONNELL Erin K * DEQ <Erin.K.MCDONNELL@deq.oregon.gov>
Sent: Tuesday, February 25, 2025 1:11 PM

To: Leisle, Dwight <Dwight.Leisle@portofportland.com>; Alison Clements <Alison.Clements@oregonmetro.gov>
Cc: GREENFIELD Sarah * DEQ <Sarah.GREENFIELD@deq.oregon.gov>; LACEY David J * DEQ <David.J.LACEY@deq.oregon.gov>
Subject: RE: Port of Portland - Willamette Cove - Draft Riverbank Soil Reuse Characterization and Upland Receptor Screening Work Plan

EXTERNAL EMAIL:

Hi Dwight and Alison,
Thank for providing the letter dated February 14, 2025, and titled *draft Riverbank Soil Reuse Characterization and Upland Receptor Screening letter*. Can you provide an update on riverbank sampling activities?

We appreciate finding ways to consolidate field sampling activities when reasonable. DEQ reviewed the above-referenced letter and provides conditional approval with the collection of additional riverbank samples as proposed. While we think the data will be useful for "pre-screening" purposes to identify potential sources for soil reuse, note that DEQ did not have an opportunity to weigh in on the scope of work and objectives prior to implementation. We do anticipate additional sampling will be required during RD/RA for soils planned for reuse onsite in upland areas.

We have the following questions and observations:

- The sampling and data quality objectives could be more clearly articulated.
- What Independent Discovery Plan will be implemented during sampling activities (conducted by Apex)?
- It is our understanding that discrete soil samples are planned for every one foot within the "removal layer" (excepting overlying soil areas sampled as part of the Willamette Cove Uplands Remedial Design Investigation) and at two boring locations (mid-point and bottom) per Transect, 13 through 18. Please confirm and is there an estimate on the total number of discrete samples that will be collected by Apex for archive?
- At present it is proposed that in consultation with DEQ, analysis of the archived soil samples will be assigned based on review of the WC Group results. Please provide additional details on how the Port proposes making decisions on which archived samples to analyze. For instance, will all discrete samples or subset be analyzed at a boring location and for all analytes proposed (or subset) within the "removal layer" if the respective composite results (collected by the in-water WC Group) are below PTW or/and RALs?
- In terms of riverbank layback leave surface screening, it is our understanding the Port plans to compare the WC Group "leave" and "sub-leave" riverbank sampling results to the upland cleanup levels; however, this data contains limitations to sufficiently assess potential risks to upland receptors (following bank layback). DEQ's expectation that a similar sampling approach used in the upland Remedial Design Investigation will be necessary for future riverbank leave surface areas and potentially sub-leave surface depending on the riverbank cleanup/stabilization

approach. We have had limited but preliminary discussions with the Port on potential strategies and timing.

- We also suggest a different term for cleanup levels other than CULs, to prevent confusion between in-water and upland criteria. For example, using remediation goals to represent upland cleanup levels.
- It would be helpful to include a figure with the proposed sample transect locations, as well as the transect cross-section figures of depicting proposed mid-point and bottom borings for transects 13-18 (similar to those presented in Appendix A in the Willamette Cove – Riverbank Characterization Work Plan Addendum prepared by MFA for the WC Group). Please include in future reporting.

Thank you,
Erin

DEQ
State of Oregon

Teleworking Tuesday through Friday. Off Mondays.

From: Steve Misner <Steve.Misner@apexcos.com>
Sent: Friday, February 14, 2025 10:29 AM
To: MCDONNELL Erin K * DEQ <Erin.K.MCDONNELL@deq.oregon.gov>
Cc: LACEY David J * DEQ <David.J.LACEY@deq.oregon.gov>; GREENFIELD Sarah * DEQ <Sarah.GREENFIELD@deq.oregon.gov>; DeMaria, Eva <demaria.eva@epa.gov>; Hanna, Laura <hanna.laura@epa.gov>; Dwight Leisle <Dwight.Leisle@portofportland.com>; Daniel.Read@portofportland.com; Chase, Crystal <Crystal.Chase@portofportland.com>; kerry.gallagher@portofportland.com; Alison Clements <Alison.Clements@oregonmetro.gov>; Herb Clough <Herb.Clough@ApexCos.com>
Subject: Port of Portland - Willamette Cove - Draft Riverbank Soil Reuse Characterization and Upland Receptor Screening Work Plan

Hi Erin – Attached is the *Draft Riverbank Soil Reuse Characterization and Upland Receptor Screening Work Plan* for your review. Let us know if you have any questions.

Thank you
Steve

Steve Misner, RG, LHg
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