

MEMORANDUM | December 19, 2024

**TO** Erin McDonnell 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 “Supplementary Groundwater Source Control Evaluation Sampling Work Plan, Willamette Cove Upland Facility,” dated November 14, 2024

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This memorandum, submitted on behalf of the Five Tribes,<sup>1</sup> reviews the *Supplementary Groundwater Source Control Evaluation Sampling Work Plan, Willamette Cove Upland Facility* prepared by Apex Companies, LLC (Apex) on behalf of the Port of Portland and Metro (Apex 2024).

## Comments

1. Based on our review of the work plan, the proposed investigation is robust and likely to achieve the purpose and objectives described in Section 1.1 of the work plan.
2. Sections 5.3.1 and 5.3.2 indicate that borings “will be continuously cored, and the soil cores will be logged and recorded using the Unified Soil Classification System.” These sections of the work plan also state that no soil samples will be collected for laboratory analysis. We recommend that the plans indicate that visual and olfactory observations will be recorded and that soil cores will be screened in the field using portable gas samplers. Further, we recommend that the plan include contingencies for collecting any visually contaminated or anomalous soil samples for laboratory analysis. In particular, the two easternmost angle borings will be drilled within the area of the former log pond. Therefore, contaminated soil may be encountered and, if so, should be further evaluated.
3. Section 5.3.3 indicates that ferrous iron will be sampled in the field during purging of groundwater monitoring wells. We recommend the work plan provide a more detailed description of how this will be done.
4. In Section 6.1, the project schedule lists spring 2025 as the anticipated timeframe to conduct field work. Also, in Section 5.3.2, with respect to the in-water sampling, the work plan states, “If the in-water sampling will be conducted outside the July 1 through October 31 work window, a variance will be obtained through the U.S. Army Corps of Engineers and DSL [Oregon Department of State Lands] (joint variance request).” If there is a technical rationale for

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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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# IEc

conducting in-water sampling in the spring (e.g., river stage), we recommend the work plan provide that justification; otherwise, we recommend the in-water work be conducted within the designated work window.

## References

Apex Companies, LLC (Apex). 2024. Supplementary Groundwater Source Control Evaluation Sampling Work Plan, Willamette Cove Upland Facility, Portland, Oregon, Prepared for: Port of Portland and Metro. Tigard, Oregon. November 14.