



November 1, 2023

Project No. M1016.01.008

Robert A. Hood, Jr.

Oregon Department of Environmental Quality

700 NE Multnomah Street, Suite 600

Portland, Oregon 97232

Re: Summary of October 12, 2023 Simplot Site Visit Discussion re: Evaluation of Ammonia Concentrations in the RM2E Project Area

Dear Robert Hood:

Maul Foster & Alongi, Inc. (MFA), prepared this letter on behalf of J.R. Simplot Company (Simplot) to memorialize discussions between Oregon Department of Environmental Quality (DEQ), U.S. Environmental Protection Agency (EPA), Simplot, and MFA during the Simplot Rivergate Site visit conducted on October 12, 2023. The Site visit was conducted in response to DEQ's request to visit the Site during urea offloading.

Discussions during the Site visit addressed questions raised by MFA and Simplot in our September 26, 2023 letter to DEQ. A summary of those discussions is provided herein for reference.

- The objective of DEQ and EPA's site visit was to observe urea offloading operations to gain an understanding of any potential ongoing sources of ammonia to the Willamette River.
- EPA indicated that there are no known ongoing sources of ammonia to the Willamette River and the expectation is that, without an ongoing source, concentrations of ammonia will decrease due to natural attenuation.
- EPA and DEQ acknowledged that ammonia is not a contaminant identified in ROD Tables 17 or 21, however it is identified in the footnote of Table 16. Ammonia is not driving remediation in Portland Harbor or at the RM2E project area, however it does pose a potential risk to benthic invertebrates.
- DEQ and EPA acknowledged that there are multiple historical sources of ammonia to the Willamette River, as indicated by the concentrations of ammonia located throughout and upstream of the Portland Harbor study area. These sources include decaying wood and historical combined sewer overflows. EPA also stated that the past and current operations at Simplot are unique at Portland Harbor because urea and anhydrous ammonia (historically) are products that are stored and distributed from the area.

Regarding additional groundwater sampling at the site, EPA and DEQ made the following statements:

- The goal of the sampling is to establish another line of evidence that there are no ongoing sources of ammonia to the Willamette River.
- Although there are ammonia screening levels that were developed for surface water, there are no screening criteria that were directly developed for groundwater samples. The goal of sampling is simply to evaluate whether there is a *potential pathway* to the river that requires further

evaluation, and detected concentrations of ammonia in groundwater is not an indication of a historical or ongoing source of contamination to the river.

- Please note the Evraz March 10, 2023 *Revised River Mile 2 East Pre-Design Investigation Evaluation Report* indicates very low groundwater flux near the Simplot site, an indication of a minimal/insignificant groundwater pathway from the Simplot Site to the river.
- EPA and DEQ are not requiring sampling for ammonia at other locations in Portland Harbor at this time. However, sampling may be required in the future.

Thank you again for a productive discussion and for taking the time to visit the Site to deepen your understanding of Site operations.

Sincerely,

Maul Foster & Alongi, Inc.

A handwritten signature in blue ink, appearing to read 'J. Glenn'.

Jessica Glenn
Senior Environmental Scientist

cc: David Lacey, DEQ
Mike Romero, DEQ
Richard Francis, EPA
Monty Johnson, J.R. Simplot Company
Ryan McLane, J.R. Simplot Company