



Oregon

Tina Kotek, Governor

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via electronic delivery

Dwight Leisle, P.E.
Port of Portland
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RE: 30% Remedial Design Package
Willamette Cove Uplands
ECSI No. 2066

Dwight:

DEQ staff reviewed the 30% Remedial Design (RD) Drawings and Specification Outline for the Willamette Cove Upland Facility (“site”) prepared by Apex on behalf of the Port of Portland (Port) and dated January 22, 2026. Apex presented an overview of the Willamette Cove Upland 30% Remedial Design on February 4, 2026. DEQ has the following comments on the above-referenced 30% RD submittals.

1. Under normal circumstances, what has been provided would not be considered a complete 30% RD package which is limited to a subset of design drawings and outline. The 30% RD presentation was informative but should not replace a supporting design report that describes the RD approach and advance necessary RD discussions. This includes design details that would be best captured in a 30% RD document to ensure that the design assumptions align with the drawings. For example, linking the remedial action objectives, remedial strategy, and relevant risk calculations to design elements presented in the 30% RD drawings. DEQ requests that future design deliverables include a report to accompany RD drawings and specifications.
2. DEQ also expects that supporting documents will be necessary to advance the design and request an outline of the 60% remedial design package and identifying supporting document deliverables. This includes discussing expectations around construction verification methods, leave surface sampling, quality assurance/quality control, schedule, reporting, long-term monitoring, and so on.
3. The preliminary detailed schedule should be provided in a PDF form for review, including Construction Phase 2 and Phase 3, identified in the presentation. For example, what areas of the site are to be completed in Phase 2 versus Phase 3? A design document would also be useful to outline the different schedule dependencies including coordination with the in-water work and tasks to complete prior to Metro’s redevelopment as a nature park. Coordination may also be necessary with the EPA regarding Unassigned Areas Fund-Lead 11(FL-11), also referred to

as the Sliver Area. At minimum the performing party will need to access the riverbank from the uplands and in-water.

4. Identify surveying planned which is often its own specification. Explain how the extents of removal, removal depths, demarcation placement, and other features will be surveyed.
5. DEQ has already commented and requested in the draft and revised Basis of Design Report that if partial excavation of DUs is carried forward in RD, that supplemental sampling and decisions be made on a half foot interval (i.e., half of the current 1-foot DU depth). However, the RD drawings specify partial excavations that are not on a 0.5-foot basis at DU-16 (at 2.6 feet), DU-19 (at 2.6 feet), DU-21 (at 2.4 feet), DU-24 (at 1.6 feet). Explain and correct future RD drawings accordingly. Partial excavations in these DUs (already documented as ecological hot spots based on results of the remedial design investigation) are subject to additional remedial design sampling and results approved by DEQ.
6. All depths of DU-41, an elongated soil berm, from 0-3 feet below the ground surface (bgs) contain soil above ecological hot spot levels. Confirm the entire DU-41 soil berm will be excavated and then additional excavation will occur below the berm to same depth as adjacent DUs. Presumably separating DU-41 (one ISM sample) into several parts, DU-41a through d, is intended to correspond to the adjacent DU boundaries and different excavation depths shown on Sheet C4.06. However, DU-41d needs further explanation as layer 3 of adjacent DU-30 is planned for excavation (e.g., buried hot spot 2-3 feet bgs).
7. DEQ seeks further discussion of DU-27, which is shown to have a 1-foot cap and no demarcation on C6.04. This DU-27 is slated for excavation from 0 to 2 feet bgs but the underlying layer 3 exceeds human health remediation goals for arsenic and dioxins/furans.
8. While DU-3 meets the criteria defined in the BODR for a 1-foot cap and no demarcation, it is an isolated case and there may be other practical considerations to maintain the continuity of the demarcation layer DU to DU for constructability and long-term operation and maintenance purposes.
9. Drawings:
 - a. Herb Clough is listed as the Principal Engineer. Is he also the Engineer of Record?
 - b. There are several placeholders for plans to be submitted and the drawings provide little more than what has already been shown in figures. There are several outstanding questions that are not addressed by this submittal.
 - i. How will access be provided?
 - ii. What permits are required?
 - iii. Who is developing the planting plans?
 - iv. What environmental controls will be in place?

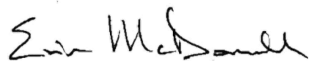
- v. What is the contracting mechanism that will be used?
 - vi. What equipment will be used?
 - vii. Protocols for cultural resources
 - viii. Etc.
- c. On Sheet No. C4.02, what is the intention of the note in the corner of DU-39 of “not included in this report”?

Next Steps

DEQ is not seeking revised 30% RD documents but requests integration of comments into future design deliverables. However, DEQ requests an outline of the forthcoming 60% RD package to advance the completeness of this derivable in terms of drawings, specifications, and corresponding design report and schedule.

Please contact me anytime about the project at erin.k.mcdonnell@deq.oregon.gov or (503)229-6900.

Sincerely,



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