

# DEQ Source Control

## Portland Harbor Superfund Site

**June 12, 2019**

EPA Portland Harbor Quarterly Public Forum *(with support from DEQ and the CAG)*

# What is Source Control?

- Controlling sources of contamination that are entering the Portland Harbor Superfund Site from upriver and lands along the river.



**River Mile 11 East, 1943**

# Portland Harbor Source Control Video

- View the [full Portland Harbor Source Control Video](#) (~40 minutes)

OR

- [Visit DEQ on YouTube](#) to view short segments of the full Portland Harbor video, such as:
  - [What is Source Control?](#) (~4 minutes)



# Source Control Objectives

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**Source Control is an element of the Portland Harbor remedy.**

➤ **Objective of source control and sediment remedy:** Achieve cleanup levels in all media.

**Two parts of Portland Harbor remedy.**

- 1. Near Term** – Active sediment remediation
- 2. Longer Term** – Monitored Natural Recovery

# Source Control Objectives

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## **Primary Objective – Support a protective remedy**

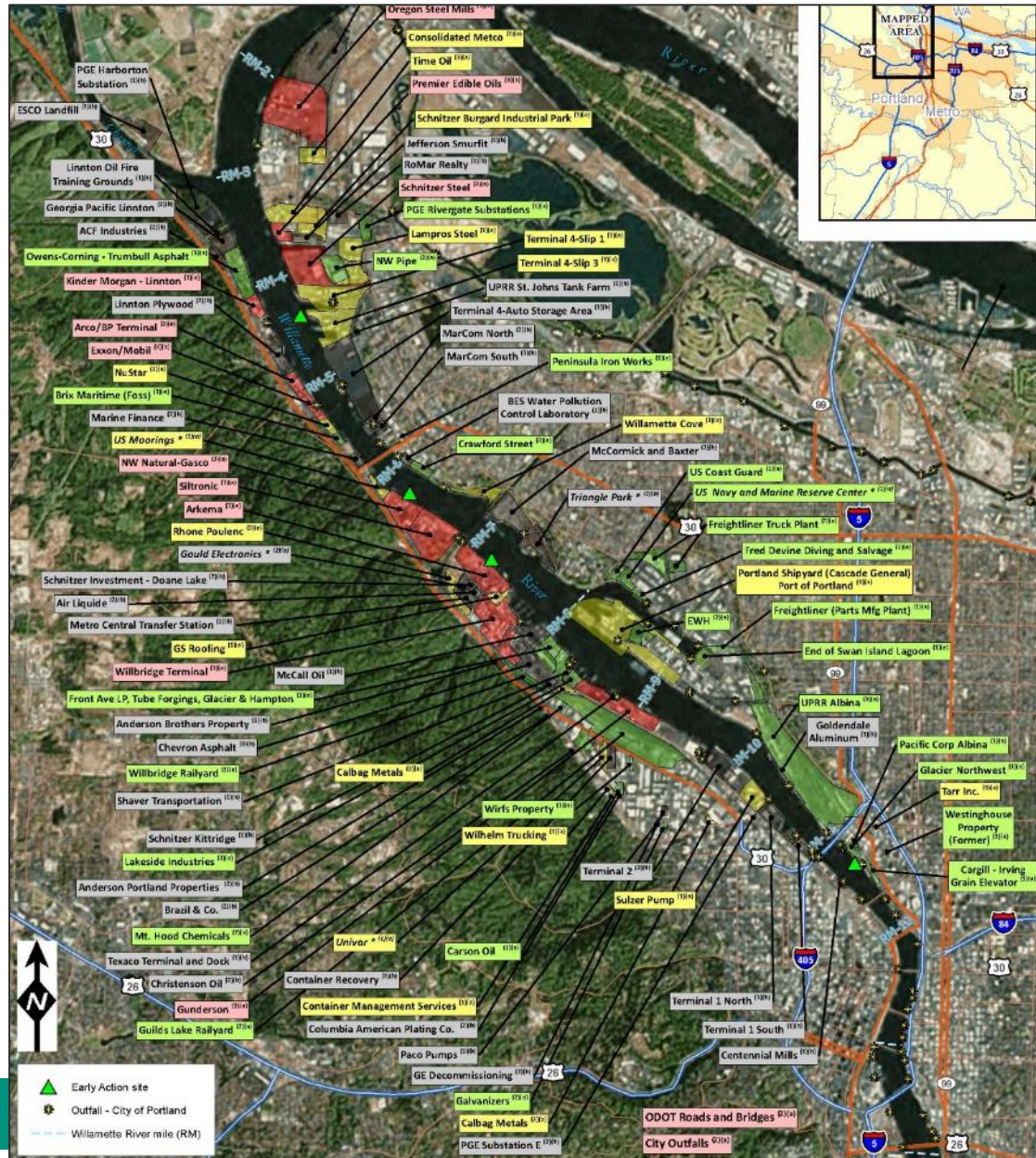
- Achieve cleanup levels in all media
- Will continue through monitored natural recovery phase

## **Interim Milestone – Prevent sediment recontamination**

- Control sources that might re-contaminate sediment at levels that trigger additional active remedial measures.
- Generally this means controlling sources above remedial action levels (RALs).



# Upland Source Control Substantially Complete



- 22 square miles
- 500 sites screened
- 172 sites further evaluated
- 55 sites in process and 80% complete
- Highest priority sites have Source Control measures
- Will not delay EPA's in-water cleanup

## Site source control priority

High priority site

Medium priority site

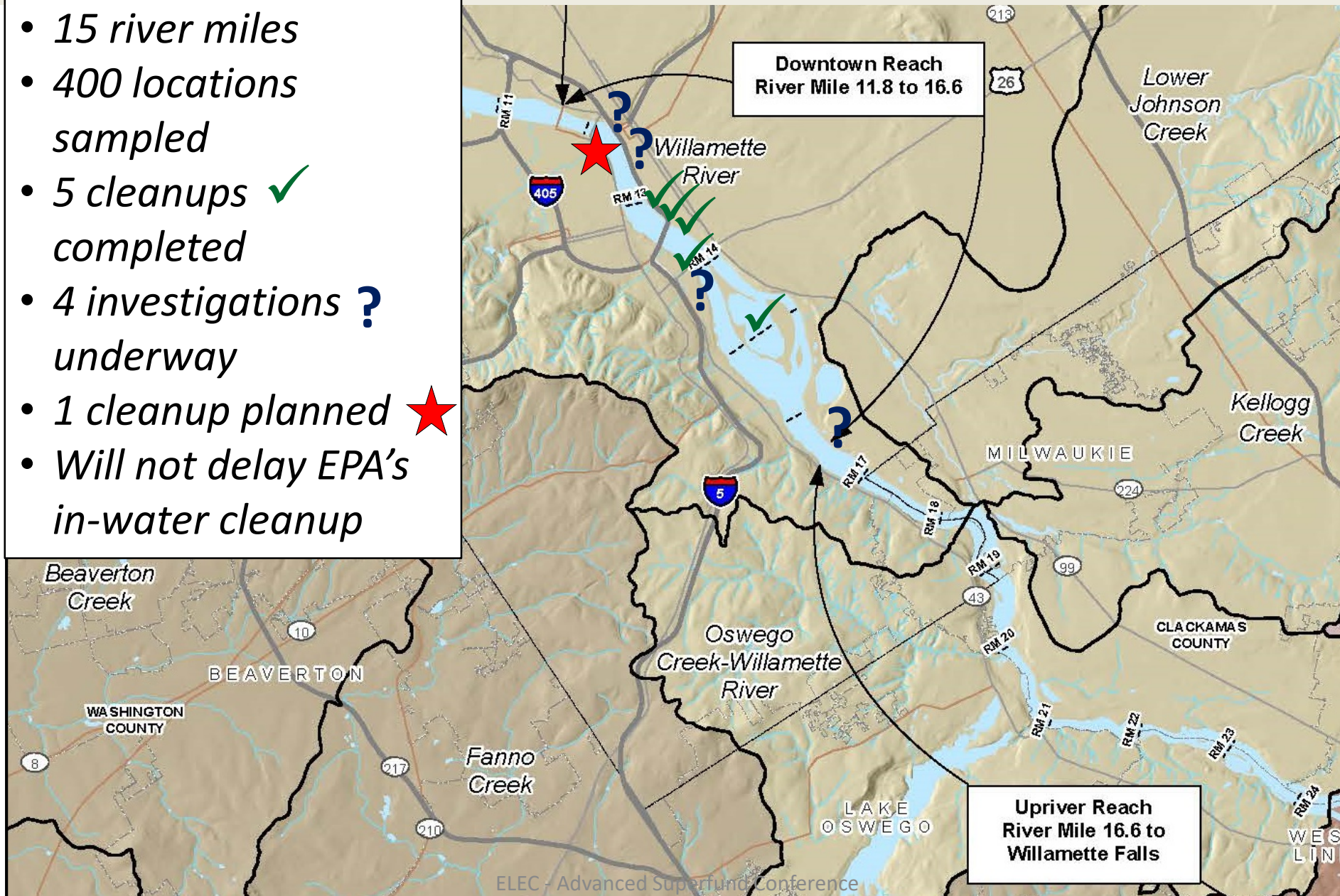
Low priority site

Source control efforts complete or not needed



# Upriver Source Control Substantially Complete

- 15 river miles
- 400 locations sampled
- 5 cleanups ✓ completed
- 4 investigations ? underway
- 1 cleanup planned ★
- Will not delay EPA's in-water cleanup



# **EPA Sufficiency Assessments**

Portland Harbor Superfund Site



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## What is a sufficiency assessment?

**Answer:** A sufficiency assessment:

- **Evaluates** whether upland *and* in-water sources are sufficiently controlled so that in-water construction can proceed and recontamination is unlikely to occur
- **Identifies** any additional actions that should be addressed in lands along the river (uplands), upriver, or as part of in-water design

**What** is the difference between source control and a sufficiency assessment?

## **Answer:**

- **Source control** focuses on a specific area or property
  - Considers upland pathways (groundwater, stormwater, erosive soils)
- **A sufficiency assessment** may include larger portions of the river based on the extent of the sediment management area (SMA)
  - Does not replace the need for source control to continue
  - Evaluates whether those sources will be managed through source control or the in-water design
  - Also considers potential in-water sources

# EPA Sufficiency Assessments



**Why** is a sufficiency assessment important?

**Answer:** Provides a check-in point to make sure cleanup work can proceed.





**When is a sufficiency assessment conducted?**

**Answer:**

- A sufficiency assessment report is developed in the early stages of the remedial design process for a project area
- Toward the end of the design process, information is updated as a final check to ensure construction can begin

**Who** does the sufficiency assessment?

**Answer:**

- Potentially responsible parties (PRPs) perform the sufficiency assessment under an agreement with EPA
- EPA has final approval authority

# EPA Sufficiency Assessments



RM11E Sufficiency Assessment Summary  
November 1, 2018

Site	ECSI #	Pathway(s)	Status	Sufficiency Assessment Contaminants	Milestone Document	Remedial Design/Source Control Task
Pacificorp-Albina Riverlots	5117	NA	A	NA	Source Control Decision, July 14 2017	NA
PacifiCorp-Knott Substation	5117	NA	A	NA	Source Control Decision, April 5 2013	NA
Tarr Inc.	1139	GW	B	Chlorinated VOCs	Record of Decision, July 17, 2017	DEQ ROD requires source area treatment and performance monitoring for groundwater pathway.
Glacier NW	5449	SW	B	BEHP	Source Control Measures Implementation Report, Nov 2016	Additional stormwater source control measures and performance monitoring for BEHP continues. Recent source tracing results presented in a September 2018 letter report available on ECSI. Source not yet fully controlled.
Westinghouse	4497	GW, SW	A	NA	Source Control Report, April 2010	Draft source control decision in review
Cargill-Irving Grain Elevator (Temco)	5561	SW	B	Metals	Source Control Evaluation, July 2014	Stormwater controls are being evaluated through monitoring. Most recent sampling results presented in February 2018 stormwater sampling report available on ECSI.
Tucker Building	3036	NA	A	NA	Source Control Decision, July 2017	NA
Valvoline Inc.	3215	NA	A	NA	NA	Excluded for SCE – no source or incomplete pathway.
Master Chemical	1302	NA	A	NA	NA	Excluded for SCE – no source or incomplete pathway.
Ross Island Sand & Gravel	5577	RB	B	NA	Source Control Evaluation Letter, June 6 2011	DEQ/EPA to confirm riverbank erosion pathway not a concern, DEQ issued a site inspection request October 8, 2018.
Vermiculite Northwest (former) (WR Grace)	2761	NA	A	NA	NA	Excluded for SCE – no source or incomplete pathway.
Cascade Brake Products	1019	NA	A	NA	NA	Excluded for SCE – no source or incomplete pathway.
Campbell Dry Cleaner	5680	NA	A	NA	NFA Determination July 2016	Excluded for SCE – no source or incomplete pathway.



# EPA Sufficiency Assessments



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## Status

**A:** Sources are **sufficiently controlled**. Cleanup may proceed.

**B:** Sources are **conditionally controlled**. Cleanup may proceed with additional control or oversight.

**C:** Sources are ***not* sufficiently assessed or controlled**. Cleanup may not proceed until additional controls are implemented & assessed.

# Questions?



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