CITY OF PORTLAND
ENVIRONMENTAL SERVICES

1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 ▪ Nick Fish, Commissioner ▪ Michael Jordan, Director

RECEIVED
AUG 24 2015
BY:

August 19, 2015

Mr. Jim Orr
Oregon Department of Environmental Quality
Northwest Region Cleanup Program
700 NE Multnomah St., Suite #600
Portland, OR 97232

Subject: Review of July 2015 *Draft Conceptual Site Model and Feasibility Study* for the Container Management Site

Dear Mr. Orr:

This letter provides comments from the City of Portland Bureau of Environmental Services to the Oregon Department of Environmental Quality (DEQ) based on our review of the above referenced document (Draft CSM/FS) submitted by SLR International Corporation (SLR) on behalf of IMACC Corporation. These comments are provided in accordance with the joint objectives of the Intergovernmental Agreement between DEQ and the City for identifying and evaluating discharges to the City's shared stormwater collection system and making recommendations regarding appropriate source control measures.

Stormwater from the Container Management site discharges to the Willamette River via the City stormwater system affiliated with Outfall 18. In 2004, City investigation of inline solids in the Outfall 18 conveyance system adjacent to the site[1] indicated that the site is a significant source of polychlorinated biphenyls (PCBs), semivolatile organic compounds, and pesticides, resulting in the identification of this site for DEQ Cleanup Program involvement. Subsequent onsite investigations by IMACC confirmed that these contaminants are present at elevated concentrations in onsite erodible surface soil, and that there are complete pathways to the Basin 18 conveyance system via direct discharge into onsite catchments and via offsite tracking into adjacent rights-of-way. Subsequent investigation in Basin 18 by the City confirms that the contaminant discharges from the site have continued. The City is in agreement that robust source control measures, such as site paving, are needed to address these pathways to Basin 18 and the river. The Draft CSM/FS provides information in support of a selected remedial action alternative, but additional information is needed to demonstrate that the proposed remedy will provide adequate source control over the long term.

The City offers the following comments and observations on the Draft CSM/FS for DEQ's consideration.

[1] BES, 2006. *Inline Solids Sampling in the Vicinity of Container Management Services and Wilhelm Trucking Co.*, City technical memorandum dated March 21, 2006.

The City of Portland complies with all non-discrimination laws including Title VI (Civil Rights) and Title II (ADA).
To request a translation, accommodation or additional information, please call 503-823-7740, or use City TTY 503-823-6868, or Oregon Relay Service: 711.

Conceptual Site Model

General comment

1. The CSM presented in Section 2.2 discusses where soils are contaminated in specific areas of the site. However, it does not identify the source of contaminants to the site soils (e.g., from historical vs. current site operations). This information is critical to ensuring that all contaminant sources are controlled and do not contaminate the proposed cap. In other words, if contaminated soil is not just from legacy operations (i.e., if incidental contaminant releases from drum reconditioning operations may continue to occur), then contaminant discharges to the paved surfaces will still have a complete pathway to the river and pavement alone will not be a sufficient control. More information is needed in the CSM to describe historical sources to site soils and potential current/future sources to areas proposed for capping.

Specific comments

2. Front Yard Drum Storage Area Drainage Basin:
   a. The second paragraph under this heading states that PCBs, metals, pesticides and polycyclic aromatic hydrocarbons were detected at concentrations above the Portland Harbor Joint Source Control Strategy screening level values in stormwater samples from "both upgradient and downgradient sample locations." Previous reports for this site have incorrectly characterized samples collected from location MH-1 as being upgradient from the site, thereby implying contaminant contributions in samples from this location are from upgradient sources. As noted in this section and previous reports, tractor trailers exit the site to NW St. Helens Road in the vicinity of inlets discharging to MH-1 and likely track impacted soils offsite, resulting in a complete offsite migration pathway for erodible soils. Therefore, samples from MH-1 likely reflect contaminant contributions from the site and should not be considered as upgradient.
   b. This section and elsewhere references the "City of Portland 42-inch concrete line" connecting at SW-2. As the City has previously noted, the 42-inch storm main on the Container Management site is not owned by the City; City ownership of this line is considered to start at the site's boundary with the adjacent Wilhelm Trucking property. Future documents should not refer to the onsite portion of this line as a City-owned line.
3. Northwest Driveway Area (Warehouse Area):
   a. Additional information is needed regarding the existing geotextile/gravel "cap" in this area. This section states that "during the course of stormwater assessment activities, geotextile fabric was placed in the driveway area, including around SW-5 and the former catch basin SW-6, to prevent transport of fine-grained soils. The area was then capped with gravel and compacted. Based on the presence of the newly laid geotextile fabric and the compacted gravel, SLR and IMACC believe sediment transport from the area should be limited; and therefore, this area will not be included in the final remedy." This cap was not constructed with DEQ approval, and additional description of the construction details (e.g., thickness) and areal extent is needed to help

support the conclusion that it will be a sufficient long-term control. As indicated in previous reports, this area is subject to heavy truck traffic and offsite tracking of contaminants is a significant concern. Soil samples collected from the warehouse dock and driveway (SS-17, SS-18, and SS-19) indicate that contaminants are present at concentrations above screening levels.

b. The text refers to "former catch basin SW-6" but does not describe when this inlet was abandoned. This inlet is shown as existing on the Figure 2 site plan and then shown as a new inlet on Figure 5. Please clarify the current and future status of catch basin SW-6.

c. It appears from Figure 5 that the same general area described for the existing geotextile/gravel cap (i.e., between SW-5 and SW-6) is proposed for new asphalt pavement, so it is not clear how much of the remaining Northwest Driveway Area (i.e., the entire area between the loading dock and NW St. Helens Rd.) will rely on the existing cap. Further information is needed to demonstrate that gravel cap integrity will be sufficient to support the current and future intensity of truck traffic in this area if no additional controls are proposed. In addition, the proposed institutional controls (i.e., deed restriction and the O&M Plan for the site cap) should also include measures for long-term monitoring and maintenance of this existing cap.

Feasibility Study

General comments

4. The proposed remedial action alternative does not include stormwater treatment of any kind. City stormwater development standards detailed in the Stormwater Management Manual (SWMM) will be triggered by the proposed redevelopment, and remedial design include requirements for onsite stormwater management and stormwater discharge quality. This information is available online[2] and will be discussed in the Early Assistance meeting IMACC has scheduled with the City to review permitting requirements.

5. The selected alternative presumes that City will reroute flows currently discharging to MH-1, in advance of the proposed drum line abandonment. The City has no plan to conduct this work; the proposed alternative will need to be amended to accommodate water currently conveyed by the line proposed for abandonment.

6. The CSM presented in Section 2 identifies the complete pathways by which contaminated site soils have migrated (and continue to migrate) offsite to the Outfall 18 stormwater conveyance system, via tracking and stormwater discharges. City source investigations in Basin 18 confirmed that site-related contaminants are still present in the Basin 18 conveyance system in the vicinity of the site. Remedial action alternatives in the Draft CSM/FS focus only on addressing contaminants on the site and do not address site-related contaminated solids in the Basin 18 system that may be a significant current and future source to the river. Addressing this offsite migration is a site

[2] https://www.portlandoregon.gov/bes/64040

responsibility. The remedial action alternatives in the revised final CSM/FS and the forthcoming Remedial Action Work Plan should address this pathway.

7. None of the proposed alternatives include paving in the Northwest Driveway Area between the warehouse and NW St. Helens Rd (i.e., the actual loading dock area). Although soil data from this area are limited, contamination is present and the area is subject to heavy truck use that likely warrants a more robust long-term control. As indicated in Comment 3 above, the CSM/FS does not demonstrate that the existing gravel cap will be a sufficient future control. Therefore, one or more of the alternatives presented in this section should include paving in this area.

8. The CSM/FS does not discuss effectiveness monitoring of the proposed remedial action alternative following implementation. However, IMACC's draft 2015-2016 Comprehensive Schedule indicates that post-remedial action stormwater evaluation (and line cleaning, if needed) will be conducted under a separate work plan. Given the long-term historical and ongoing industrial operations at the site, the fact that soils with relatively high concentrations of contaminants will likely remain in place beneath the cap (even after hot spot removal), and the potential continued exposure of erodible soils on a portion of the site (i.e., the Northwest Driveway Area), a rigorous demonstration of source control measure effectiveness will be essential.

Specific comments

9. Section 3.2 – Development of Remedial Action Alternatives

    a. Containment: Under discussion of the paving alternative, the document indicates that paving would be a viable alternative for this site "as long as it's complemented by stormwater management practices that capture and treat the stormwater prior to discharge." However, the detailed description of the recommended alternative (which includes paving) does not include any stormwater treatment. As noted in Comment 4 above, the proposed alternative will trigger SWMM requirements that include provisions for stormwater quality. The revised final document will need to include a description of all proposed stormwater treatment elements.

    b. Drumline Alternatives: The paragraph describing the abandonment option notes that under this alternative "stormwater currently entering the Site from St. Helens Road and other upstream properties to SW-12 would have to be diverted away to other stormwater conveyance systems by the City of Portland." Per Comment 5 above, the revised final CSM/FS will need to describe how current drainage to the drum line will be managed under the selected alternative.

10. Section 4.1.1 – Hot Spot Investigation and Removal: This component of the proposed remedial action alternative indicates that the excavations in two hot spot areas (SS-11 and SS-13) will be 20′ x 20′ x 3′. Existing surface soil data from this area does not seem sufficient to delineate the dimensions of the soil that exceeds the hot spot concentration (i.e., only four soil samples were collected from the north end of the SW-8 area and sample density was not adequate to determine the extent of hot spots). This section and the proposed Hot Spot

Removal Work Plan should specify additional data that are needed before excavation begins and the decision framework that will be used to determine whether additional soil will be excavated depending on results of the proposed confirmation soil samples.

11. Section 4.1.2 – Additional Site Characterization Activities: Four soil borings are proposed along the former drum conveyor system. This document and the proposed work plan should specify whether soil will be removed from this area if hot spot concentrations are exceeded. In addition, the forthcoming Remedial Action Work Plan will need to provide the rationale for the proposed groundwater monitoring well locations depicted on Figure 5. None of the locations appear to be at or immediately downgradient of the front yard storage area where 75 years of drum storage and reconditioning operations have been conducted on a permeable surface. Historical site records indicate that paint, oil, and solvent storage areas were located in the Front Yard adjacent to the rail corridor and that drywells were present in the Front Yard and Soule Yard.
12. Section 4.1.3 indicates that new stormwater catch basins and earthen berms will be constructed in the SW-8 area as part of the selected alternative. These features are not shown on Figure 5. The revised final CSM/FS should provide more information on the location and nature of these elements.
13. Section 4.4 – Railroad Right-of-Way Improvements. The description in this paragraph does not describe what the proposed improvements are. Does this relate to the area of proposed new strip of asphalt pavement shown on the west side of the warehouse building on Figure 5?
14. Inconsistencies between Figure 2 (Site Plan) and Figure 5 (Site Detail: Alternatives 3 and 4) need to be rectified in the revised final CSM/FS. For example, Figure 2 does not show the site storm line connection between the roof drains at the east end of the warehouse building and the concrete vault between SW-2 and SW-12. This line is believed to have been constructed in 2012. Is it slated for abandonment as shown in Figure 5? Inlet SW-1 and its connecting line are shown as existing on Figure 2, but are not shown as components to be abandoned on Figure 5.

Specific feedback on permitting considerations for the conceptual plan will be provided to the site at the Early Assistance meeting scheduled next month. In addition, I provided the CSM/FS to the BES Industrial Stormwater permit manager for the site to help to keep him informed of pending changes and proposed source controls at the site.

The City appreciates the ongoing collaboration with DEQ on identifying and controlling contaminant sources in Portland Harbor. If you have any questions, please contact me at 503-823-2296.

Sincerely,

Linda Scheffler
Water Resources Program Manager
Portland Harbor Program

c: Alex Liverman / DEQ
~~Eva DeMaria / EPA~~
Sean Sheldrake/EPA
Kristine Koch / EPA
Kim Cox / City of Portland
Tim Dean/City of Portland