Lower Willamette Group

Co-Chairperson: Jim McKenna, Port of Portland
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October 10, 2005

Mr. Chip Humphrey
Mr. Eric Blischke
Remediation Project Manager
U.S. Environmental Protection Agency, Region 10
Oregon Operations Office
811 S.W. 6th Avenue
Portland, Oregon 97204

Re: **Portland Harbor Superfund Site: Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-102001-0240; LWG Response to EPA Comments on Draft Conceptual Site Model Update**

Dear Mr. Humphrey and Mr. Blischke:

Enclosed please find the LWG's response to EPA's January 11, 2005 comments on the September 15, 2004 submittal of the Draft Conceptual Site Model Update. The enclosed response addresses the cover letter and general comments. EPA's specific comments on individual site summaries will be addressed in the resubmitted site summaries, as indicated.

With respect to moving forward with this task, the LWG proposes the following schedule:

- On October 12, 2005, submittal of the site summaries identified in EPA's comments that require resubmitted.
- Addressing comments on site summaries not included in the September 2004 submittal, if any, with the next iteration of the Conceptual Site Model (included with the Round 2 Comprehensive Site Characterization Summary Report).

As noted, the next iteration of the CSM will be included in the Round 2 Comprehensive Report. The site summaries will also be updated at that time. The LWG proposes that next set of updates to the site summaries be in an addendum format, which will consist only of new and revised sections for each site summary. The LWG will interview appropriate DEQ project managers to determine if new information has been generated since the first drafts of the site summaries were prepared (e.g., for sites included in the Draft CSM Update, this would include information generated since June 2004). For those sites with additional information, an addendum that updates pertinent sections of the site summary will be prepared.

The enclosed comment responses and the items identified above are intended to facilitate ongoing discussion with EPA and its agency partners regarding the iterative development of the Conceptual Site Model for the Site.

Sincerely,

Bob Wyatt
Jim McKenna
Co-Chairs

Enclosure

cc: LWG Executive Committee
LWG Legal Committee