From: Zhen, Davis
To: Parrett.Kevin@deq.state.or.us
Subject: Fwd: DEQ Comments on Updated Portland Harbor FS
Date: Wednesday, April 27, 2016 11:35:09 AM

Kevin,

I don't recall this as being part of the top issues from DEQ. Could you confirm if this is true?

Thanks,

Sent from iPhone
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Davis Zhen
Environmental Cleanup Unit 2
Office of Environmental Cleanup
1200 Sixth Avenue Suite 900
M/S ECL – 122, Seattle, WA 98101
Tel: (206) 553-7660
Cell: (206) 437-5826
****

Begin forwarded message:

> **From:** MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>
> **Date:** April 26, 2016 at 2:55:05 PM PDT
> **To:** "'Koch, Kristine'" <Koch.Kristine@epa.gov>
> **Cc:** "Zhen, Davis" <Zhen.Davis@epa.gov>, PARRETT Kevin <Parrett.Kevin@deq.state.or.us>, "Shephard, Burt" <Shephard.Burt@epa.gov>, PETERSON Jenn L <PETERSON.Jenn@deq.state.or.us>, GREENFIELD Sarah <Greenfield.Sarah@deq.state.or.us>, ROICK Tom <ROICK.Tom@deq.state.or.us>
> **Subject: RE: DEQ Comments on Updated Portland Harbor FS**
>
> Kristine,
> I think the issue is that we don't believe Table 2.2-2 accurately reflects the BERA findings and conclusions related to sediment concentrations associated with site-specific benthic toxicity. Sediment quality values (SQVs) from site specific benthic models in the BERA identify the COCs that are ecologically significant. However, not all of these are carried forward in Table 2.2-2. The BERA did not evaluate the validity of using a truncated list of model COCs in achieving protective levels.
> This is an important issue to DEQ. I know that you and your team are scrambling, but I would like to find time to discuss it. If not before May 11th, I would propose we add it to the monthly coordination meeting agenda.
> Matt
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> ---
>
> **From:** Koch, Kristine [mailto:Koch.Kristine@epa.gov]
> **Sent:** Monday, April 25, 2016 10:44 AM

To: MCCLINCY Matt
Cc: Zhen, Davis; PARRETT Kevin; Shephard, Burt; PETERSON Jenn L; GREENFIELD Sarah; ROICK Tom
Subject: RE: DEQ Comments on Updated Portland Harbor FS

Matt – Table 2.2-2 describes the selection of COCs. Only the COCs that are carried forward is EPA taking action on, therefore, we are only developing cleanup numbers for those COCs. There may be toxicity from other chemicals in the river, but EPA is not taking an action on those. This list is consistent with the findings and conclusions in the BERA. Bioassays are not acceptable cleanup goals, but can be used in monitoring the site. We can include collection of bioassays in the monitoring plan.

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

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From: MCCLINCY Matt [mailto:MCCLINCY.Matt@deq.state.or.us]
Sent: Monday, April 25, 2016 10:27 AM
To: Koch, Kristine <Koch.Kristine@epa.gov>
Cc: Zhen, Davis <Zhen.Davis@epa.gov>; PARRETT Kevin <Parrett.Kevin@deq.state.or.us>; Shephard, Burt <Shephard.Burt@epa.gov>; PETERSON Jenn L <PETERSON.Jenn@deq.state.or.us>; GREENFIELD Sarah <Greenfield.Sarah@deq.state.or.us>; ROICK Tom <ROICK.Tom@deq.state.or.us>
Subject: DEQ Comments on Updated Portland Harbor FS

Hi Kristine,

DEQ is continuing our review of the updated FS and has the following comments.

RAO5, Benthic PRGs: The list of benthic PRGs is incomplete relative to the site wide list of contaminants of concern correlated with site wide benthic toxicity in the BERA, or sediment quality values (SQVs). The use of a truncated list of sediment SQVs shown to be correlated with toxicity increases the likelihood that toxicity will remain even if PRGs are achieved, and therefore precludes the use of sediment concentrations in demonstrating achievement of site wide acceptable benthic toxicity exposure levels. DEQ requests that EPA include the complete list of benthic toxicity SQVs as PRGs or demonstrate how the truncated list is correlated and protective of benthic toxicity. The full list of SQVs for the site specific models can be found in Tables 6-10 and 6-11 of the BERA. An initial review generally identifies HPAH, LPAH, chromium, silver, dibutyl phthalate, phenol, carbazole, and dibenzofuran as absent from the RAO5 PRG list.

In Table 2.2-8, EPA selected the lowest SQV from the two site specific models, the logistic regression model (LRM) and floating point model (FPM), and one consensus based national model using as probable effect concentrations (PECs). This approach is recommended only if the full list of site specific chemicals correlated with toxicity is

used, as described above.

Please note that DEQ previously provided the following comment on EPA's 2015 FS.

Ecological PRGs, Benthic Toxicity. It is not clear how EPA arrived at the current list of PRGs in RAO 5. Table 2.2-1 appears to be a reduced list of potentially significant risk drivers for benthic toxicity. The BERA does not include a list of ecologically significant chemicals related to benthic risk, and instead lists toxicity test results as the measure of significance ("risks to benthic invertebrates clustered in 17 benthic AOCs"). Dropping numeric PRGs that would provide strong lines of evidence related to benthic toxicity is problematic in ensuring protectiveness for benthic toxicity, particularly in the absence of bioassay toxicity criteria PRGs. DEQ requests that bioassay tests, along with a definition of acceptable risk, be included in the PRG table and that relevant sediment quality guidelines be used as a secondary line of evidence.

Matt McClincy
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