



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

SUPERFUND &
EMERGENCY
MANAGEMENT DIVISION

September 13, 2019

Ms. Betsy Ruffle
Associate Vice President & Senior Scientist
AECOM
250 Apollo Drive
Chelmsford, MA 01884

RE: EPA Comments for the Pre-Remedial Design Investigation Evaluation Report

Dear Ms. Ruffle:

The United States Environmental Protection Agency (EPA) has reviewed the *PDI Evaluation Report, Portland Harbor Pre-Remedial Design Investigation and Baseline Sampling, Portland Harbor Superfund Site, Portland, Oregon* (PDI Report) dated June 17, 2019 and submitted on behalf of the Portland Harbor Pre-Remedial Design Group (Pre-RD Group). In accordance with the Administrative Settlement Agreement and Order on Consent for Pre-Remedial Design Investigation and Baseline Sampling (ASAOC) and Paragraph 6.2 of the Statement of Work (SOW), the EPA submits the enclosed comments for the Pre-RD Group's consideration.

The EPA approved the following documents during the implementation of the PDI/Baseline sampling:

- Quality assurance project plan
- Data quality management plan
- Bathymetry field sampling plan (FSP)
- Surface water and sediment traps FSP
- Surface sediment FSP
- Subsurface sediment coring FSP
- Fish tissue FSP
- Acoustic fish tracking study FSP
- Background porewater study FSP
- Surface sediment horizontal and vertical control standard operating procedure
- Acoustic fish tracking protocol modification form 01
- Change requests 01 through 10, 12 through 16, 19, 21, and 22
- Surface sediment anomaly requests 01 through 49
- Surface water anomaly notifications SW-01, SW-02, SW-03, and SW-04

With just a few corrections listed in Appendix C.4 Comments to the PDI/Baseline database, the EPA finds the PDI/Baseline data collected under the ASAOC to be of suitable quality and generally acceptable. Pending these corrections, the EPA can confirm the validity of the PDI/Baseline data for placement in the Scribe.NET platform and posting to the Portland Harbor Interim Data Portal.

As described in the enclosed data uses document, the EPA anticipates that these data will be used, in addition to existing and forthcoming design-level data, to inform implementation of the Record of Decision, including the delineation of the sediment management areas requiring active remediation and the selection of the appropriate remedial technology.

The EPA also reviewed the Pre-RD Group's interpretations of the data in accordance with the ASAOC and PDI work plan. As explained in detail in the enclosed comments, in general the EPA does not agree that the data collected or the Pre-RD Group's analysis support many of the conclusions presented in the PDI Evaluation Report. However, these new data sets, in conjunction with the existing data sets, will form the key underlying support for decision-making as remedial design work proceeds. The EPA will fully utilize this new, comprehensive data set and anticipate that it will have an impact on the data-dependent determinations to be made under the ROD, including the flexibility provided in the ROD in making final technology decisions at the individual SMAs and achieving the remedial objectives set out in the ROD.

If it chooses to, the Pre-RD Group may revise the PDI Evaluation Report within 45 days after receiving the comments pursuant to Paragraph 6.2 of the SOW. However, other than the corrections to the PDI/Baseline database described above, the Pre-RD Group is not required to submit a revised PDI Evaluation Report to the EPA. The PDI Evaluation Report is not a document requiring EPA approval, but rather only comment, as described in Paragraphs 5.1 and 5.7 of the SOW. The EPA does not intend to provide further review and comment on future iterations of the PDI Evaluation Report.

Once the EPA receives the corrections to the PDI/Baseline database, in accordance with the ASAOC Paragraph 28.1, the EPA will be able to determine that the Pre-RD Group has fully performed the Work required under the ASAOC.

If you have any questions, please feel free to reach me at 206-553-7660 or email at zhen.davis@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Davis Zhen', with a long horizontal flourish extending to the right.

Davis Zhen, Section Chief
Site Cleanup Section 2

Enclosures