



**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY
REGION 10**
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

SUPERFUND &
EMERGENCY
MANAGEMENT DIVISION

April 27, 2020

Via Email

URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY

Debbie Deetz Silva
Environmental Specialist
Evraz, Inc., NA
14400 N. Rivergate Blvd.
Portland, Oregon 97203

Re: Unilateral Administrative Order for Remedial Design at River Mile 2 East Project Area issued to Evraz, Inc., NA, Amendment No. 1
Portland Harbor Superfund Site, CERCLA Docket No. 10-2020-0051

Dear Ms. Deetz Silva:

On March 26, 2020, the United States Environmental Protection Agency issued a Unilateral Administrative Order (UAO) for Remedial Design at River Mile 2 East Project Area to Evraz, Inc., NA (Evraz). Evraz requested a conference, per the UAO, which occurred on April 9, 2020, and subsequently submitted written materials to EPA on April 14, 2020. By letter dated April 17, 2020, Evraz was notified of EPA's intent to modify the UAO based on information provided by Evraz during the conference and in the written materials.

Please see attached UAO, Amendment No. 1, that amends the UAO with changes to the Statement of Work (SOW). Per Evraz's request, the following changes were made in the SOW:

Paragraph 1.3:

Change "might" to "will" in considering data replacement;
Delete "equivalence analysis";
Delete the paragraph on dioxin/furan background investigation.

Paragraphs 3.8(f), 5.6(e), 5.6(l), and 5.6(m):

Clarify that certain supporting deliverables are "draft" or "preliminary draft."

Changes were also made to certain schedule deadlines in Paragraph 6.2 of the SOW in response to Evraz's request to allow more time to conference with EPA and clarify ambiguities. A redline version of the SOW is enclosed for ease in identifying all modifications made to the document.

The above captioned UAO, as amended, shall be effective 5 days after signature by the Director of EPA Region 10's Superfund and Emergency Management Division or May 4, 2020. On or before the effective date, Evraz shall notify EPA in writing of Respondent's irrevocable intent to comply with the Order.

If you have technical questions regarding the Order, contact Eva DeMaria, Remedial Project Manager, at (206) 553-1970 or email demaria.eva@epa.gov. Legal questions and communications from attorneys should be directed to Stephanie Mairs, Assistant Regional Counsel, at (206) 553-7359 or email mairs.stephanie@epa.gov.

Sincerely,

Calvin J. Terada
Director

Enclosures: Unilateral Administrative Order, Amendment No. 1, and Statement of Work
Statement of Work RLSO

cc and email: w/enclosures

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