PORSR-202.1

LWG
LOWER WILLAMETTE GROUP

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SEP 16 2011
Environmental Cleanup Office

September 14, 2011

Chip Humphrey
U.S. Environmental Protection Agency, Region 10
805 SW Broadway, Suite 500
Portland, OR 97205

Kristine Koch
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900, M/S ECL-115
Seattle, WA 98101

Re: Lower Willamette River, Portland Harbor Superfund Site
USEPA Docket No: CERCLA-10-2001-0240
Monthly Progress Report for August 2011

Dear Mr. Humphrey and Ms. Koch:

This monthly status report provides information required by the Portland Harbor Superfund Site Administrative Settlement and Administrative Order on Consent (ASOC).

1. ACTIONS TAKEN IN AUGUST 2011

- On August 3, 2011 LWG provided a list of questions on EPA's RALs and alternatives comments to discuss during the August 5, 2011 technical meeting.
- On August 5, 2011 LWG provided a request for clarification as to which of EPA's FS key elements comments are directive.
- A technical meeting to discuss EPA's RALs and alternatives comments was held on August 5, 2011.
- On August 6, 2011 LWG provided to EPA GIS files for figures of the LWG proposed alternatives presented during the August 5, 2011 technical meeting.
- A meeting with the LWG Senior Managers and EPA was held on August 8, 2011.
- A technical meeting to discuss EPA's directed RALs and alternatives was held on August 10, 2011.
- LWG provided a response to EPA's August 11, 2011 letter on the alternatives to be evaluated in the draft FS on August 23, 2011.
- LWG provided Portland Harbor groundwater plume GIS files to DEQ on August 30, 2011.

Deliverables Approved by EPA

None.

Deliverables Submitted to EPA

- LWG provided the Draft Final Remedial Investigation to EPA on August 29, 2011.

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Comments/Documents Provided by EPA

- On August 10, 2011, EPA provided draft EPA alternatives with PRGs for discussion during the August 10, 2011 meeting with the LWG. During the meeting, Kristine Koch identified that some of the RAL values in EPA's table were incorrect.
- On August 11, 2011, EPA provided directed comments on the FS Key Elements Check In regarding development of alternatives.
- On August 12, 2011 EPA provided clarification as to which of the previous directed comments have been superseded by the directives included in EPA's August 11, 2011 letter, and provided an extension of the deadline to invoke dispute resolution for all directed comments until August 25, 2011.
- On August 24, 2011, EPA requested electronic versions (i.e.,Word and Excel files), of the Round 3B Fish and Collocated Surface Sediment Field Sampling Plan (Integral 2007b) and the Round 2 QAPP Addendum 9 (Integral 2007a).
- On August 25, 2011 EPA provided a response to the LWG's August 23, 2011 letter which responded to EPA's direction on the alternatives and RALs to be evaluated in the draft FS. Later that day, EPA provided a revised response, which corrected a date and provided clarification regarding the LWG's acceptance of the EPA directives contingent on EPA's consideration of a schedule extension.

2. PROBLEMS ENCOUNTERED, ANTICIPATED DELAYS, AND SOLUTIONS

The LWG continued to receive directed comments from EPA on the June 21 and 22, 2011 FS Key Elements Check In during the first half of the month of August. The current project schedule had accommodated only two weeks for EPA to review and comment on the FS Key Elements. In a letter to the LWG dated August 25, 2011, EPA provided approval of the comment resolutions and acknowledged that additional time will be necessary to complete the draft FS and instructed the LWG to generate and submit a formal schedule extension request. The LWG request for a project schedule change will likely be submitted in early September.

3. RESULTS OF SAMPLING, TESTS, AND OTHER DATA RECEIVED

None.

4. SCHEDULE FOR THE NEXT FOUR MONTHS

Work covered by the ASOC that is currently planned for September, October, November, and December 2011 includes the following:

- November 15, 2011: Submittal of the Draft Feasibility Study

Submittal dates for pending documents currently under preparation by LWG and scheduled for submittal in upcoming months are listed in Table 1 – Status of Active LWG Deliverables – Portland Harbor RI/FS. This table has been reformatted from previously submitted versions to only include pending and recently submitted deliverables for which EPA comments or approvals are required. Table 2 – Status of LWG Deliverables – Portland Harbor RI/FS reflects the more complete list of LWG submittals and is equivalent to the former Table 1 provided in previous progress reports.

5. DOCUMENTS AND ISSUES AWAITING EPA RESPONSE

EPA comments or approvals have not been received on a number of documents that have been submitted to EPA as required by the ASOC; these submittals are listed in Tables 1 and 2. The LWG requests that EPA provide document approvals for these submittals to verify that the terms of the ASOC are being met and issues are resolved to maintain progress on the RI/FS. Also, the LWG believes that many of the documents listed as future submittals in Table 2 are no longer needed (see Status/Comments column) and requests that EPA review the list and confirm that these documents are indeed not needed.

If you have any questions, please give me a call at (503) 688-5057.

Sincerely,

Jennifer Woronets

Jennifer Woronets
LWG Administrative Project Coordinator

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LWG Management
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Table 1. Status of Active LWG Deliverables - Portland Harbor RI/FS

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
Draft Final RI	08/29/2011	Submitted 08/29/2011	10/29/2011

Notes:

[1] - **Bolded Deliverables** are primary deliverables per Section XIX., Paragraph 4 of ASOC (EPA 2001a). Unbolded Deliverables are secondary deliverables per Section XIX, Paragraph 5 of ASOC. *Italicized Deliverables* do not have stipulated penalty amounts.

[2] - Listed Submittal Deadlines are for draft documents. Unless otherwise specified, all final documents are due to EPA 30 days following receipt of comments from EPA.

Deliverable completed and approved by EPA.
Deliverable submitted to EPA and its partners.
Underlining indicates text change from last progress report.

Table 2. Status of LWG Deliverables - Portland Harbor RI/FS

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
Round 1			
Compilation of Information for Sources Between RM 11 and 11.6 East Bank of Portland Harbor	November 2007	Submitted to EPA and DEQ 11/21/2007. Need written response from DEQ and EPA that upland sources are under investigation consistent with the Road to the ROD.	
Round 2 Biota			
Revised Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue	11/23/2005	Submitted 11/23/2005; approved with conditions on 12/6/2005; a final QAPP addendum is required	12/8/2005
Final Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue	TBD	On 2/9/2006, the LWG submitted a response to EPA's comments on the 11/23/2005 version of the QAPP addendum. The LWG has not heard back from EPA on that response. The LWG believes that a final QAPP in not required. Need EPA agreement that this final QAPP is not required.	
Hydro/Sed Modeling			
Phase 2 Hydrodynamic Re-calibration Report	May 2009	Submitted 5/7/2009; EPA comments received 7/22/2009	
Groundwater Pathway			
Draft Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan	4/22/2005	Submitted 4/22/2005; EPA comments received 6/3/2005	
Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan - Response to EPA Comments	TBD	Outstanding issues to be addressed in GW Appendix to Draft RI Report.	

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
Revised Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan (including Appendix A - Site Summaries and Appendix B - Pilot Study Data Report)	TBD	Outstanding issues to be addressed in GW Appendix to Draft RI Report.	
Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches	4/29/2005	Submitted 4/29/2005; EPA comments received 6/10/2005	
Revised Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches	No longer needed	The only seep determined to pose a potentially complete exposure pathway is discharge from Outfall 22B. The existing data from Outfall 22B include the upland COIs and meet the data quality requirements for risk evaluation (Category 1/QA2). Based on the Round 2 Report evaluations, no additional seep data are needed. Therefore, this FSP is no longer needed.	
Revised Round 2 Groundwater Pathway Assessment SAP Attachment 2: Transition Zone Water FSP	3/27/2006	Redline version submitted 3/27/2006; EPA needs to provide final approval of this FSP. This revised FSP was prepared and submitted after the associated field work was completed.	4/28/2006
Revised Round 2 Groundwater Pathway Assessment SAP Attachment 3: Supplement to QAPP Addendum 3	10/7/2005	Submitted 10/7/2005: Conditional approval of proposed changes to the QAPP addendum received from EPA on 9/30/2005. EPA needs to provide final approval of this QAPP. Approval to conduct sampling was provided by EPA on 9/30/2005.	
Revised Transition-Zone Water FSP Addendum 1 Sampling Plans for ExxonMobil, Siltronic, Gasco, and Arkema	3/27/2006	Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 9/30/2005. This revised FSP was prepared and submitted after the associated field work was completed.	

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
Revised Transition-Zone Water FSP Addendum 2	3/27/2006	Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 10/13/2005. This revised FSP was prepared and submitted after the associated field work was completed.	
Natural Attenuation			
Step 2 Natural Attenuation Evaluation Report	No longer needed		
Tech Memos			
Revised TRV Selection TM	10/23/2004	Submitted; EPA comments received 3/18/2005. On 6/10/2005, EPA directed the LWG to submit the final TRV Selection TM with the PRE. The final TRV Selection TM was submitted as an appendix to the 9/9/2005 PRE.	
Second Revision Preliminary Risk Evaluation Approach TM	1/7/2005	Submitted; EPA comments received 3/4/2005. On 6/10/2005, EPA directed the LWG to submit the final PRE approach TM with the PRE. The final PRE Approach was submitted as an appendix to the 9/9/2005 PRE.	
Comprehensive ERA Approach TM	6/27/2004	Submitted; EPA comments received 10/1/2004	
Revised Comprehensive ERA Approach TM	TBD	In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed.	
Process for Derivation of PRGs TM	1/20/2005	Submitted; EPA comments received 6/30/2006; a revised tech memo is not required.	3/21/2005
Draft Approach to Determining Background for the Portland Harbor Superfund Site	3/3/2006	Submitted 3/3/2006; EPA comments received 6/5/2006; revised tech memo required.	5/2/2006

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
Revised Approach to Determining Background for the Portland Harbor Superfund Site	7/20/2006	The revised approach to determining background for the Portland Harbor Superfund Site will be provided in the Draft RI Report	
Process for Delineating the Extent of Contamination Upstream and Downstream of the ISA		The approach for Delineating the Extent of Contamination Upstream and Downstream of the ISA will be provided in the Draft RI Report	
COPC Selection Interim Deliverable	~1/23/2006	In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed.	
ECOLOGICAL RISK ASSESSMENT			
Ecological Preliminary Risk Evaluation (PRE)	9/9/2005	Submitted 9/9/2005; EPA comments received 4/28/2006, a revised PRE is not required	11/8/2005
Round 2 Benthic Assessment Interpretation Report	3/17/2006	Submitted 3/17/2006; EPA comments received 7/6/2006	5/16/2006
Food Web Modeling Report: Evaluating Trophic Trace and the Arnot and Gobas Models for Application to the Portland Harbor Superfund Site	11/4/2005	Submitted 11/4/2005; EPA comments received 3/10/2006	1/3/2006
Revised Ecological Water Screening Levels	5/26/2006	Submitted 5/25/2006; directive EPA comments received 9/15/2006, and a correction to the xylene AWQC on 9/27/06. Additional revisions were submitted on 10/13/2006.	7/9/2006
Feasibility Study			
Literature Survey of Treatability Studies	October 2007	Submitted 10/31/2007. EPA comments received 2/15/08. A revised deliverable is not required, EPA comments indicated that they should be addressed in the FS.	Jan-08

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
Round 3B (FS) Side-scan Sonar Data Report	September 2008	Submitted 5/18/2009	
Treatment Technologies Screening Table	Early May 2009	Submitted 6/5/2009; EPA comments received 7/9/2009	7/6/2009
Screening of Disposal Facilities for the Feasibility Study Memorandum	Mid May 2009	Submitted 6/18/2009; EPA comments received 7/10/2009	7/2/2009
Early Preliminary Remediation Goals (PRGs)	Late March 2009	Submitted 3/27/2009	-
Benthic Toxicity AOPCs Check In Materials	September 2010	Submitted 9/07/2010	
Treatment Technology Evaluation Tools Memo	-	Submitted 03/15/2011; EPA comments received 4/27/2011	
Draft Mitigation Determination Approach for Use in the FS Tools Memo	-	Submitted 03/15/2011; EPA comments received 4/27/2011	
Draft Feasibility Study Costing Approach Tools Memo	-	Submitted 03/15/2011; EPA comments received 4/27/2011	
Draft Identification of "COCs" and Contaminant Mobility Evaluation Criteria For the Draft FS Tools Memo	-	Submitted 03/16/2011; EPA comments received 4/27/2011	
Dredging Water Quality Evaluation Tools Memo	-	Submitted 03/31/2011; EPA comments received 4/27/2011	
Alternatives Screening Materials		Submitted 04/06/2011	
Draft FS Key Elements Presentation	-	Submitted Materials 06/06/2011 Presentation 06/21 and 06/22/2011	

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
General Field/Data/RI Reporting			
Validated Analytical Results	90 days following completion of each sampling activity		
Comprehensive Round 2 Site Characterization Summary and Data Gaps Analysis Report	2/21/2007	Submitted 2/21/2007. EPA comments on Sections 1-9 and Appendices A, B, C, D, F, and G received 1/15/08; comments on Section 10 received 3/20/08; comments on Section 11 received 5/16/08; comments on Appendix E received 8/8/08. This document was never intended to be revised or approved by EPA; comments will be addressed in the Draft RI Report.	
Draft Sediment Mobility Testing Data Report	August 2009	Submitted 8/11/2009	EPA comments not anticipated
Draft Baseline Ecological Risk Assessment Report	Early September 2009	Submitted 9/2/2009 Preliminary EPA comments received 12/23/09. EPA comments received 07/16/2010. EPA benthic approach comments received 09/27/2010.	11/2/2009
Draft Baseline Human Health Risk Assessment Report	Late September 2009	Submitted 9/23/2009 Preliminary EPA comments received 12/23/09. EPA comments received 07/16/2010.	11/23/2009
Draft Remedial Investigation Report	Late October 2009	Submitted 10/27/2009 EPA comments received 07/16/2010	12/27/2009
Benthic Toxicity Reanalysis Technical Memorandum	Mid November 2009	Submitted 11/13/2009 EPA benthic approach comments received 09/27/2010.	01/13/2009
Supporting Electronic Information for Draft Benthic BERA	November 2009	Submitted 11/19/2009	01/19/2010
Draft Final BHHRA	5/2/2011	Submitted 05/02/2011	7/2/2011
Draft Final BERA	7/5/2011	Submitted 07/01/2011	9/1/2011

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
Human Health and Ecological Risk Management Recommendations	July 2011	Submitted 07/22/2011	9/22/2011
Draft Final Remedial Investigation Report	8/29/2011	Submitted 08/29/2011	10/29/2011
STORMWATER			
Stormwater Loading Check-in Materials	2/1/2009	Submitted 2/18/2009; EPA comments received 5/6/2009	
Revised Stormwater Loading Calculation Methods	April 2010	Submitted 04/30/2010; EPA comments received 08/17/2010	6/30/2010
Final Stormwater Loading Calculation Methods		Submitted 01/31/2011: EPA comments received 03/02/2011 Revised Report Submitted 04/15/2011	3/31/2011
SEDIMENT			
Round 3B Field Sampling Plan: Sediment Sampling and Benthic Toxicity Testing		Submitted 5/4/2007; EPA comments received 7/25/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
Upriver and Multnomah Channel Sediment Evaluation and Field Sampling Plan Technical Approach		Submitted 5/25/2007; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
Draft Round 3B Surface and Core Sediment FSP Preliminary Technical Memorandum		Submitted 5/25/2007; EPA comments received 8/9/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
Draft Round 3B Erosion Core Sediment FSP Technical Memorandum	August 2007	Submitted 8/29/07; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
Round 3B QAPP Addendum 10 for Sediment Sampling	November 2007	Submitted 12/17/2007. Need EPA approval of this QAPP Addendum.	

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
Round 3 Sediment Trap Deployment Field Report		Submitted 06/30/2011	
FATE & TRANSPORT			
Draft Chemical Fate & Transport Model Development and Data Gaps Identification Report	July 2007	Submitted 7/20/2007; EPA comments received 10/15/07. LWG response to comments submitted 1/8/2008.	
F&T Surface Sediment FSP – Addendum to 3B Sediment FSP	December 2007	Submitted 12/10/2007; EPA comments received 1/2/08. 1/16/08 LWG agreed with EPA not to perform the sampling. Need EPA agreement that this deliverable is no longer needed.	
Draft Bioaccumulation Modeling Report		Submitted 7/27/2009	
CULTURAL RESOURCES			
Draft Cultural Resource Survey Report	12/16/2005	Submitted 12/16/2005	2/14/2006; EPA comments not time-critical at this point in the project

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Only deliverables due within the next four months are shown.

Deliverable completed and approved by EPA.
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