
REDACTED

From: Todd Thornburg <tthornburg@anchorqea.com>

Sent: Thursday, May 18, 2023 3:39 PM

To: sarah.greenfield <sarah.greenfield@deq.oregon.gov>; Heidi.Nelson <Heidi.Nelson@deq.oregon.gov>; HAFLEY Dan * DEQ <Dan.HAFLEY@deq.oregon.gov>

Cc: Wyatt, Robert <robert.wyatt@nwnatural.com>; Patricia Dost <pdost@pearllegalgroup.com>; Kendra Skellenger <kskellenger@anchorqea.com>; Jen Mott <jmott@anchorqea.com>

Subject: RE: PGM Year 2 Monitoring Report - final redlines for your review

Hi Sarah, Heidi, and Dan,

Attached for your review is the second set of redlines for the PGM Year 2 Monitoring Report, incorporating DEQ comments from your letter dated March 31 and our subsequent meeting on April 28. This revision includes the new Table 2 that DEQ requested and was discussed during our recent meeting.

Please let us know if this final set of redlines is acceptable, and if so, we'll issue the Final Report.

There is one technical item we wanted to follow up on. During our last meeting, DEQ had some questions about bathymetric survey accuracy. In the LTMMP, the vertical precision of the bathymetric survey was estimated at 0.2 feet. For comparison, the survey precision specified in USACE Hydrographic Surveying Manual (EM-1110-2-1003) is 0.3 feet. But precision is not the same as accuracy. The estimated bathymetric survey accuracy we are assuming at PGM (0.5 feet) is the same as the accuracy that EPA assumed in the Portland Harbor Feasibility Study (p. 3-14), based on a recommendation by David Evans Associates.

Please reach out if you have any questions during your review.

Thank you,

Todd

503.924.6175 (Direct)

503.819.0277 (Cell)

From: GREENFIELD Sarah * DEQ <Sarah.GREENFIELD@deq.oregon.gov>

Sent: Friday, March 31, 2023 12:01 PM

To: Todd Thornburg <tthornburg@anchorage.com>; Wyatt, Robert <robert.wyatt@nwnatural.com>
Cc: Patricia Dost <pdost@pearllegalgroup.com>; Kendra Skellenger <kskellenger@anchorage.com>; Jen Mott <jmott@anchorage.com>; HAFLEY Dan * DEQ <Dan.HAFLEY@deq.oregon.gov>; NELSON Heidi * DEQ <Heidi.NELSON@deq.oregon.gov>
Subject: RE: Draft Final PGM Year 2 Monitoring Report - for your review

Todd and Bob –

Please find attached DEQ comments on the revised Year 2 Monitoring Report. The revised recommendations provided in Section 6 appear to deviate from the performance criteria established in the LTMMP, so we suggest scheduling a meeting to discuss the applicable performance criteria prior to resubmittal of the Year 2 Monitoring Report and to support interpretation of the Year 3 bathymetry survey. We have availability to meet on Thursday April 13: 1-2pm, Tuesday April 18: 9-10am, or Thursday April 20: 9:30-11am. Let me know how you'd like to proceed.

Sarah Greenfield, P.E.

Project Manager/Engineer
Oregon Department of Environmental Quality
Northwest Region Cleanup Program
(503) 229-5245

Teleworking Tuesday – Friday, off on Mondays

New e-mail address: sarah.greenfield@deq.oregon.gov

From: Todd Thornburg <tthornburg@anchorage.com>
Sent: Thursday, March 2, 2023 5:01 PM
To: GREENFIELD Sarah * DEQ <Sarah.GREENFIELD@deq.oregon.gov>; Wyatt, Robert <robert.wyatt@nwnatural.com>
Cc: Patricia Dost <pdost@pearllegalgroup.com>; Kendra Skellenger <kskellenger@anchorage.com>; Jen Mott <jmott@anchorage.com>; HAFLEY Dan * DEQ <Dan.HAFLEY@deq.oregon.gov>; NELSON Heidi * DEQ <Heidi.NELSON@deq.oregon.gov>
Subject: RE: Draft Final PGM Year 2 Monitoring Report - for your review

Hi Sarah,

The Draft Final PGM Year 2 Monitoring Report had been posted up on the PGM FTP site for your download and review. The report can be accessed using the same FTP instructions listed at the bottom of this email chain. Both a redlined and a clean version of the report are posted.

The clean version is complete with all tables and figures. The redlined version includes only the tables and figures that were revised, including the following:

- (1) Table 8. Includes a new column (far right) of calculated site-wide average concentrations for bioaccumulative COCs.
- (2) Figures 5a, 5b, 5c. Includes revised inset tables in the upper right corner with more detailed remedial technology descriptions.
- (3) Figures 7a, 7b. Includes revised inset tables in the upper right corner with more detailed remedial technology descriptions.
- (4) Figures 8a, 8b, 8c, 8d. New figure set includes cross-section location map (8a) and detailed cross-sections through critical cover areas (B1, C3, D, and F1) with current and historical sediment chemistry (primary COCs, exceedance ratios, and depths).

We believe we have incorporated all of DEQ's comments from your letter dated February 1. Please let us know if you have any further comments, or if we have your approval to issue the final report.

Thank you,

Todd

503.924.6175 (Direct)
503.819.0277 (Cell)

From: GREENFIELD Sarah * DEQ <Sarah.GREENFIELD@deq.oregon.gov>

Sent: Tuesday, February 7, 2023 4:09 PM

To: Todd Thornburg <tthornburg@anchorqea.com>; Wyatt, Robert <robert.wyatt@nwnatural.com>

Cc: Patricia Dost <pdost@pearllegalgroup.com>; Kendra Skellenger <kskellenger@anchorqea.com>; Jen Mott <jmott@anchorqea.com>; HAFLEY Dan * DEQ <Dan.HAFLEY@deq.oregon.gov>; NELSON Heidi * DEQ <Heidi.NELSON@deq.oregon.gov>

Subject: RE: Draft PGM Year 2 Monitoring Report - for your review

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Todd –

Thanks for getting that Year 3 bathymetry survey scheduled. The March 3 date for resubmission of the Year 2 monitoring report works for DEQ and we look forward to seeing those cross sections. Don't hesitate to reach out if you have any other questions or would like to discuss specific comments.

Thanks,

Sarah Greenfield, P.E.

Project Manager/Engineer
Oregon Department of Environmental Quality
Northwest Region Cleanup Program
(503) 229-5245

Teleworking Tuesday – Friday, off on Mondays

New e-mail address: sarah.greenfield@deq.oregon.gov

From: Todd Thornburg <tthornburg@anchorqea.com>

Sent: Tuesday, February 7, 2023 10:24 AM

To: GREENFIELD Sarah * DEQ <Sarah.GREENFIELD@deq.oregon.gov>; Wyatt, Robert <robert.wyatt@nwnatural.com>

Cc: Patricia Dost <pdost@pearllegalgroup.com>; Kendra Skellenger <kskellenger@anchorqea.com>; Jen Mott <jmott@anchorqea.com>; HAFLEY Dan * DEQ <Dan.HAFLEY@deq.oregon.gov>; NELSON Heidi * DEQ <Heidi.NELSON@deq.oregon.gov>

Subject: RE: Draft PGM Year 2 Monitoring Report - for your review

Hi Sarah,

We will move ahead with scheduling a Year 3 bathymetry survey in mid-June. We're also working on the detailed cross-sections that DEQ requested.

We are requesting 30 days to incorporate DEQ comments and submit a revised, redlined report for your final review on March 3. Does that work for you?

Todd

503.924.6175 (Direct)
503.819.0277 (Cell)

From: GREENFIELD Sarah * DEQ <Sarah.GREENFIELD@deq.oregon.gov>
Sent: Wednesday, February 1, 2023 4:16 PM
To: Todd Thornburg <tthornburg@anchorqea.com>; Wyatt, Robert <robert.wyatt@nwnatural.com>
Cc: Patricia Dost <pdost@pearllegalgroup.com>; Kendra Skellenger <kskellenger@anchorqea.com>; Jen Mott <jmott@anchorqea.com>; HAFLEY Dan * DEQ <Dan.HAFLEY@deq.oregon.gov>; NELSON Heidi * DEQ <Heidi.NELSON@deq.oregon.gov>
Subject: RE: Draft PGM Year 2 Monitoring Report - for your review

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Todd and Bob –

Please find attached DEQ comments on the PGM Year 2 Monitoring Report. As always, please feel free to reach out to me with any questions.

Sarah Greenfield, P.E.
Project Manager/Engineer
Oregon Department of Environmental Quality
Northwest Region Cleanup Program
(503) 229-5245

Teleworking Tuesday – Friday, off on Mondays
New e-mail address: sarah.greenfield@deq.oregon.gov

From: Todd Thornburg <tthornburg@anchorqea.com>
Sent: Monday, January 9, 2023 4:06 PM
To: GREENFIELD Sarah * DEQ <Sarah.GREENFIELD@deq.oregon.gov>; HAFLEY Dan * DEQ <Dan.HAFLEY@deq.oregon.gov>; NELSON Heidi * DEQ <Heidi.NELSON@deq.oregon.gov>
Cc: Wyatt, Robert <robert.wyatt@nwnatural.com>; Patricia Dost <pdost@pearllegalgroup.com>; Kendra Skellenger <kskellenger@anchorqea.com>; Jen Mott <jmott@anchorqea.com>
Subject: RE: Draft PGM Year 2 Monitoring Report - for your review

Hi Sarah, Heidi, and Dan,
Happy New Year! I hope you all had a wonderful holiday season.
The Draft Year 2 Monitoring Report for the PGM site is now posted and available for your download and review at the PGM FTP site. FTP site access instructions are provided at the bottom of this email. The report incorporates DEQ's advance review comments provided in your comment letter dated August 18.

Please let us know if you have any questions during your review, or if you have any trouble downloading the report.
Thank you,

Todd M. Thornburg, PhD, RG
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Hours: Monday – Thursday, off Friday

