
REDACTED

From: Young, Hunter <Young.Hunter@epa.gov>

Sent: Friday, June 16, 2023 10:02 AM

To: Jen Mott <jmott@anchorqea.com>

Cc: Patricia Dost <pdost@pearllegalgroup.com>; Peterson, Lance <peterstone@cdmsmith.com>; Ryan Barth <rbarth@anchorqea.com>; Azhar, Wardah <azharw@cdmsmith.com>; Nik Bacher <nbacher@anchorqea.com>; Joe Smith <jsmith@anchorqea.com>; Bob Wyatt <rjw@nwnatural.com>; Natalie Lynch <nlynch@anchorqea.com>

Subject: RE: US Moorings First Phase Pre-Design Investigation DSR and Second Phase PDIWP

Bob, Jen, Ryan,

EPA has reviewed the *Final Revised First Phase Pre-Design Investigation Data Summary Report and Second Phase Pre-Design Investigation Work Plan* for the US Moorings Project Area and it is conditionally approved. EPA's document approval is conditioned on modifying the sample preservation technique in Table G4-1 and Table H-8 accordingly and resubmitting Appendices G and H. Regarding EPA Specific Comment 21, for both Table G4-1 and Table H-8 (Barge Dewatering Dredge Elutriates), the holding time for the extracts for dioxin/furan analyses is listed as 1 year and the and the sample preservation technique is listed as "Cool 2° to 6°C". EPA Method 1613 states that dioxin/furan extracts may be held for a year "if stored in the dark at <-10°C". Also, while comments on Appendix L (Shoreline Habitat Assessment) were adequately addressed, EPA notes that piles within the active channel margin (ACM) were not included in the area calculations in Table 1 of Appendix L. As remedial design progresses and habitat data gaps are filled, EPA anticipates further coordination with NW Natural on habitat area calculations and use of the Habitat Equivalency Analysis values.

Thank you,

Hunter Young
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Region 10 - Oregon Operations Office
Young.Hunter@epa.gov
(503)-326-5020

USMS0038306

From: Jen Mott <jmott@anchorqea.com>
Sent: Wednesday, June 7, 2023 7:20 PM
To: Young, Hunter <Young.Hunter@epa.gov>
Cc: pdost@pearllegalgroup.com; Peterson, Lance <petersonle@cdmsmith.com>;
rbarth@anchorqea.com; Wardah Azhar <azharw@cdmsmith.com>; Nik Bacher
<nbacher@anchorqea.com>; Joe Smith <jsmith@anchorqea.com>; rjw@nwnatural.com; Natalie
Lynch <nlynch@anchorqea.com>
Subject: RE: US Moorings First Phase Pre-Design Investigation DSR and Second Phase PDIWP

Hunter,

The following is provided on behalf of Ryan.

Below please find a OneDrive link for EPA review of the *Final Revised First Phase Pre-Design Investigation Data Summary Report and Second Phase Pre-Design Investigation Work Plan* for the US Moorings Project Area. The document was revised to address EPA's below emailed May 22, 2023, comments on the *Final First Phase Pre-Design Investigation Data Summary Report and Second Phase Pre-Design Investigation Work Plan*. Specifically, to address EPA General Comment 3 on the habitat assessment, revisions were made to the *Final Revised First Phase Pre-Design Investigation Data Summary Report and Second Phase Pre-Design Investigation Work Plan* main text and Table 1 and Figures 2a and 2b, Appendix J NW Natural Responses to EPA's May 22, 2023 Comments, and Appendix L *Shoreline Habitat Assessment*. To address EPA Specific Comment 21a regarding dredge elutriate analysis, the three additional referenced COCs with ROD Table 17 surface water cleanup levels were added to Appendix G *Second Phase Pre-Design Investigation Field Sampling Plan* and Appendix H *Second Phase Pre-Design Investigation Quality Assurance Plan*.

[2023-06-07 US Moorings Final Revised Phase 1 DSR Phase 2 PDIWP](#)

Please let us know how the NW Natural team can support your review.

As always, do not hesitate to call Bob or me if you would like to discuss anything.

Regards, Ryan

Jen Mott
Project Coordinator
Anchor QEA, LLC
jmott@anchorqea.com
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USMS0038307

From: Young, Hunter <Young.Hunter@epa.gov>

Sent: Monday, May 22, 2023 2:34 PM

To: Jen Mott <jmott@anchoragea.com>

Cc: Patricia Dost <pdost@pearllegalgroup.com>; Peterson, Lance <petersonle@cdmsmith.com>; Ryan Barth <rbarth@anchoragea.com>; Azhar, Wardah <azharw@cdmsmith.com>; Nik Bacher <nbacher@anchoragea.com>; Joe Smith <jsmith@anchoragea.com>; Bob Wyatt <rjw@nwnatural.com>; Natalie Lynch <nlynch@anchoragea.com>

Subject: RE: US Moorings First Phase Pre-Design Investigation DSR and Second Phase PDIWP

Bob, Jen, Ryan,

EPA has reviewed the Final Combined DSR-PDIWP for the US Moorings Project Area. The document is generally responsive to EPA's conditional approval dated February 22, 2023; however, the following changes are required before EPA can approve the document. The required changes pertain to two comments:

EPA General Comment 3 on the habitat assessment: The shoreline habitat assessment presented in the revised Appendix L generally characterizes the existing habitat in most of the US Moorings Project Area and provides data adequate for use in the Habitat Equivalency Analysis (HEA)-based approach. During remedial design, opportunities for enhancing habitat within the project area should be considered, as habitat enhancement may be required as compensatory mitigation for unavoidable short and/or long-term impacts to habitat from remedial action. Habitat enhancement opportunities may include removing riprap from the riverbank, replanting the riverbank with native vegetation, removing sheet pile walls to reconnect the river to the floodplain, and regrading the riverbank and shoreline to create shallow in-water habitat. In addition, removal of pilings would enhance habitat for aquatic species including federally listed salmonids. EPA requests the following changes to Appendix L:

1. Table 1 indicates deep water areas are "uncharacterized". As shown in Attachment A, deep water should be characterized with respect to substrate. Revise the text to indicate this is a data gap to be filled during remedial design.
2. Figure 2a indicates the most downstream portion of the project area was not characterized due to lack of access during the habitat survey. Revise the text to indicate this is a data gap to be filled during remedial design.
3. Figures 2a and 2b: add the locations where photos presented in Attachment B were taken.

EPA Specific Comment 21a regarding dredge elutriate analyses: Revise the Final Combined DSR-PDIWP Section 5.3.1.1 text (and any other relevant locations in the document) to include analysis of all Record of Decision Table 17 contaminants of concern (COCs) with surface water cleanup levels for the dredge elutriate samples. Appendix H Table H-5 currently does not include MCPP; 2,3,7,8-TCDD TEQ; and tributyltin. EPA is revising the draft Water Quality Monitoring Plan (WQMP) template based on input from the remedial design performing parties and the Technical Coordination Team. Water quality criteria for the COCs identified by NW Natural will be included in the revised WQMP Table 2, as needed.

Only those files that are modified need be resubmitted.

Thank you,

Hunter Young
U.S. Environmental Protection Agency
Region 10 - Oregon Operations Office
Young.Hunter@epa.gov
(503)-326-5020

From: Jen Mott <jmott@anchoragea.com>
Sent: Wednesday, May 10, 2023 11:54 AM
To: Young, Hunter <Young.Hunter@epa.gov>
Cc: pdost@pearllegalgroup.com; Peterson, Lance <peterstone@cdmsmith.com>;
rbarth@anchoragea.com; Wardah Azhar <azharw@cdmsmith.com>; Nik Bacher
<nbacher@anchoragea.com>; Joe Smith <jsmith@anchoragea.com>; rjw@nwnatural.com; Natalie
Lynch <nlynch@anchoragea.com>
Subject: RE: US Moorings First Phase Pre-Design Investigation DSR and Second Phase PDIWP

Hunter,

The following email is provided on behalf of Ryan.

Below please find the OneDrive link for EPA review of the *Final First Phase Pre-Design Investigation Data Summary Report and Second Phase Pre-Design Investigation Work Plan* for the US Moorings Project Area. The Final Combined DSR-PDWIP was developed to address EPA's February 22, 2023 comments on the Revised Combined DSR-PDWIP and EPA's July 21, 2022 comments on the *First Phase Pre-Design Investigation Data Summary Report and Second Phase Pre-Design Investigation Work Plan* for the US Moorings Project Area dated May 27, 2022. To expedite your review, no revisions were made to Appendices A through F, H, I, and K. Appendices G (FSP), J (Response to Comments), and L (Shoreline Habitat Assessment) were revised for this submittal.

[2023-05-10 US Moorings Phase 1 DSR Phase 2 PDIWP](#)

Please let us know how the NW Natural team can support your review.

As always, do not hesitate to call Bob or me if you would like to discuss anything.

Regards, Ryan

Jen Mott
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intended recipient, please be aware that any disclosure, copying, distribution, or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify us by telephone at 503.972.5014.

From: Young, Hunter <Young.Hunter@epa.gov>
Sent: Wednesday, February 22, 2023 3:46 PM
To: Jen Mott <jmott@anchoragea.com>; Bob Wyatt <rjw@nwnatural.com>
Cc: Patricia Dost <pdost@pearllegalgroup.com>; Peterson, Lance <peterstone@cdmsmith.com>; Ryan Barth <rbarth@anchoragea.com>; Azhar, Wardah <azharw@cdmsmith.com>; Nik Bacher <nbacher@anchoragea.com>; Joe Smith <jsmith@anchoragea.com>
Subject: RE: US Moorings First Phase Pre-Design Investigation DSR and Second Phase PDIWP

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Bob, Jen, Ryan,

See attached for EPA's comments and conditional approval of the US Moorings Revised First Phase Pre-Design Investigation Data Summary Report and Second Phase Pre-Design Investigation Work Plan.

Please reach out with any questions. Thank you,

Hunter Young
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From: Jen Mott <jmott@anchoragea.com>
Sent: Wednesday, November 30, 2022 6:27 PM
To: Young, Hunter <Young.Hunter@epa.gov>
Cc: pdost@pearllegalgroup.com; Peterson, Lance <peterstone@cdmsmith.com>; rbarth@anchoragea.com; rjw@nwnatural.com; Wardah Azhar <azharw@cdmsmith.com>; Nik Bacher <nbacher@anchoragea.com>; Joe Smith <jsmith@anchoragea.com>
Subject: RE: US Moorings First Phase Pre-Design Investigation DSR and Second Phase PDIWP

Hunter,

The following email is provided on behalf of Ryan.

Below please find the download instructions for EPA review of the *Revised First Phase Pre-Design Investigation Data Summary Report and Second Phase Pre-Design Investigation Work Plan* (Revised Combined DSR-PDIWP) for the US Moorings Project Area. The Revised Combined DSR-PDIWP was

USMS0038310

developed to address EPA's July 21, 2022 comments on the *First Phase Pre-Design Investigation Data Summary Report and Second Phase Pre-Design Investigation Work Plan* for the US Moorings Project Area dated May 27, 2022. To expedite your review, no revisions were made to Appendices A through F. Appendices G (FSP) and H (QAPP) were revised and Appendices I through L are new for this submittal. Please let us know how the NW Natural team can support your review.

Please note that NW Natural completed the expedited second phase pre-design investigation seepage meter deployment between September 29 through October 5 timeframe per EPA's attached approval.

Instructions to access the FTP:

To access the FTP site automatically using Windows Explorer please follow the steps below for your version of Windows:

- **Windows 7:** Click Start -> and click in the search box; **Windows 8.1/10:** Right-Click Start -> Run
- Copy/Paste the following line into the "Open" box for XP/8.1/10 or the "Search" box for Windows 7 and hit "enter"

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- You should now be logged into the site using Windows Explorer. You can use copy/paste to move files to or from the site

To access the FTP site manually using a FTP browser like [CoreFTP](#) or Windows Explorer please use the info below.

- Site URL:
- Username: **REDACTED**
- Password:

To access the FTP site via web browser please follow the steps below.

- Click on the following link: **REDACTED**
- Input the username and password that are listed in the above section
- Use the tools available directly to the site to download or upload

As always, do not hesitate to call Bob or me if you would like to discuss anything.

Regards, Ryan

Jen Mott
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USMS0038311

From: Young, Hunter <Young.Hunter@epa.gov>
Sent: Thursday, July 21, 2022 8:21 AM
To: Jen Mott <jmott@anchorqea.com>
Cc: Patricia Dost <pdost@pearllegalgroup.com>; Peterson, Lance <petersonle@cdmsmith.com>; Ryan Barth <rbarth@anchorqea.com>; Bob Wyatt <rjw@nwnatural.com>; Azhar, Wardah <azharw@cdmsmith.com>; Nik Bacher <nbacher@anchorqea.com>; Joe Smith <jsmith@anchorqea.com>
Subject: RE: US Moorings First Phase Pre-Design Investigation DSR and Second Phase PDIWP

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Bob, Jen, Ryan,

See attached for EPA's comments on the US Moorings First Phase Pre-Design Investigation Data Summary Report and Second Phase Pre-Design Investigation Work Plan.

EPA is reviewing the groundwater information provided regarding proposed seepage meter deployments that was provided to us on 7/13 and will be responding soon. Additionally, EPA recommends that NW Natural provide the dive safety plan for this work as soon as possible. EPA requests 4 weeks to review the dive safety plan in order to allow resolution of any issues that require a back and forth.

Thank you,

Hunter Young
U.S. Environmental Protection Agency
Region 10 - Oregon Operations Office
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From: Jen Mott <jmott@anchorqea.com>
Sent: Friday, May 27, 2022 3:21 PM
To: Young, Hunter <Young.Hunter@epa.gov>
Cc: pdost@pearllegalgroup.com; Peterson, Lance <petersonle@cdmsmith.com>; rbarth@anchorqea.com; rjw@nwnatural.com; Wardah Azhar <azharw@cdmsmith.com>; Nik Bacher <nbacher@anchorqea.com>; Joe Smith <jsmith@anchorqea.com>
Subject: US Moorings First Phase Pre-Design Investigation DSR and Second Phase PDIWP

Hunter,

The following email is provided on behalf of Ryan.

USMS0038312

Below please find the download instructions for EPA review of the *First Phase Pre-Design Investigation Data Summary Report and Second Phase Pre-Design Investigation Work Plan* for the US Moorings Project Area. The report was developed pursuant to Administrative Settlement Agreement and Order on Consent for Removal Action (AOC; CERCLA Docket No. 10-2009-0255) and Remedial Design Statement of Work, Portland Harbor Superfund Site, US Moorings Project Area (SOW; EPA 2020a) executed between NW Natural and the U.S. Environmental Protection Agency (EPA).

Please note that NW Natural would like to complete the proposed seepage meter deployment during the September/October timeframe when the river elevations are generally at their lowest relative to the upland groundwater elevations consistent with EPA's *Remedial Design Guidelines and Considerations*. EPA previously approved NW Natural seepage meter deployments at the Gasco Sediments Site Project Area in 2017 and 2018 during low and high river elevations, respectively, and the EPA-approved means, methods and marine contractors have been transferred into the *First Phase Pre-Design Investigation Data Summary Report and Second Phase Pre-Design Investigation Work Plan*. Anchor QEA has performed outreach to the marine contractors, and they anticipate being very busy during the target timeframe. Therefore, they are requesting that we enter into a contract soon to perform the work. NW Natural requests expedited review and approval of the seepage meter deployment portion of the second phase pre-design investigation scope of work so we can proceed with contracting this work during the target timeframe, which is anticipated to precede EPA's approval of the full scope of work.

Please let us know how the NW Natural team can support your review.

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- Copy/Paste the following line into the "Open" box for XP/8.1/10 or the "Search" box for Windows 7 and hit "enter"

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- Input the username and password that are listed in the above section
- Use the tools available directly to the site to download or upload

As always, do not hesitate to call Bob or me if you would like to discuss anything.
Regards, Ryan

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