
From: Young, Hunter <Young.Hunter@epa.gov>
Sent: Tuesday, September 8, 2020 9:42 AM
To: Jen Mott <jmott@anchorqea.com>; Ryan Barth <rbarth@anchorqea.com>; Bob Wyatt <rjw@nwnatural.com>
Cc: Patricia Dost <pdost@pearllegalgroup.com>; Jason Cornetta <jcornetta@anchorqea.com>; Peterson, Lance <peterstone@cdmsmith.com>
Subject: RE: US Moorings Project Area Pre-Design Investigation Work Plan

[CAUTION: EXTERNAL EMAIL]

Hello Bob and Ryan,

Thank you for your work in revising the US Moorings PDIWP. The document addresses EPA's expectations provided in our August 26, 2020 conditional approval message with the exception of Appendix E. EPA is available to discuss NW Natural's proposed data replacement approach contained in Appendix E of the PDIWP. Field work may begin once access is received and we can discuss Appendix E at a later date.

Thanks,

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

From: Jen Mott <jmott@anchorqea.com>

Sent: Thursday, September 3, 2020 8:53 AM

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

Cc: pdost@pearllegalgroup.com; Jason Cornetta <jcornetta@anchoragea.com>; Peterson, Lance <petersonle@cdmsmith.com>; rbarth@anchoragea.com; rjw@nwnatural.com

Subject: RE: US Moorings Project Area Pre-Design Investigation Work Plan

Hunter,

The following email is provided on behalf of Ryan.

Below please find the download instructions for EPA review of the *Revised Final Pre-Design Investigation Work Plan* (PDIWP) for the US Moorings Project Area. The PDIWP 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). An initial version of the PDIWP was submitted to EPA on June 5, 2020, and EPA provided comments on July 14, 2020. NW Natural submitted a revised PDIWP on August 4, 2020, that incorporated the necessary revisions to address EPA's comments. EPA responded on August 26, 2020 and stated that the revisions are generally responsive to EPA's requested changes and the PDIWP is conditionally approved pending NW Natural's acknowledgment of fourteen additional comments. This additional revised version of the PDIWP provides NW Natural's acknowledgement of these additional comments and incorporates the necessary revisions to address each comment based on the comment responses provided in Appendix F2.

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

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Jen Mott
Project Coordinator
Anchor QEA, LLC
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From: Young, Hunter <Young.Hunter@epa.gov>
Sent: Wednesday, August 26, 2020 1:16 PM
To: Jen Mott <jmott@anchorqea.com>; Bob Wyatt <rjw@nwnatural.com>; Ryan Barth <rbarth@anchorqea.com>
Cc: Patricia Dost <pdost@pearllegalgroup.com>; Jason Cornetta <jcornetta@anchorqea.com>; Peterson, Lance <peterstone@cdmsmith.com>
Subject: RE: US Moorings Project Area Pre-Design Investigation Work Plan

EXTERNAL EMAIL

Hi Bob and Ryan,

EPA has reviewed the revised US Moorings PDI Work Plan (PDIWP) and finds the revisions to be generally responsive to EPA's requested changes. The PDIWP is conditionally approved with the expectation that NW Natural address/acknowledge the comments below.

1. In response to PDIWP General Comment 1, the revised PDIWP states that there are no RAL/PTW exceedances in the Newfields data collected within the project area. Based on the Newfields dataset posted to EPA's data portal, the S-19 core has two intervals that exceed the total PAHs RAL at 0 -1 ft bml (38,621 µg/kg) and 2-3 ft bml (87,527 µg/kg) and the S-20 core has a total PAH RAL exceedance at 5-6 ft bml (62,072 µg/kg). Similar to the approach proposed for the Navigation Channel Project Area, EPA requests that the S-19 and S-20 core locations be reoccupied to verify the RAL exceedances at these locations.
2. In response to PDIWP General Comment 3, NW Natural states the following in the Appendix F response: "The first phase PDI also proposes the collection of high spatial resolution (i.e., spaced 150 feet or less) subsurface sediment cores. The subsurface sediment cores along the perimeter of the refined SMAs will inform both RD technical evaluations (e.g., depth of contamination and capping demonstrations) and subsurface SMA refinement". Refinements to the ROD SMAs will not be approved until the multiple lines of evidence evaluation of subsurface data is performed as stated in NW Natural's response. It is EPA's expectation that all the depth of contamination cores will be evaluated for potential incorporation in the refined SMAs and not just "along the perimeter of the refined SMAs". Accordingly, the 2nd sentence in the quoted statement should be changed to the following: "The subsurface

sediment cores throughout the Project Area will inform both RD technical evaluations (e.g., depth of contamination and capping demonstrations) and subsurface SMA refinement”.

3. In response to PDIWP Specific Comment 6, NW Natural references the response to EPA General Comment 3 on the PDIWP regarding the use of subsurface data. EPA suggests NW Natural propose a buried contamination evaluation process for discussion and approval by EPA prior to initiating the Basis of Design Report.
4. In response to PDIWP Specific Comment 12, NW Natural has provided a data replacement approach in Appendix E. EPA’s contractor, CDM Smith, confirmed through Anchor QEA that Appendix E was provided so that a data replacement framework is in place for point-by-point replacement if that seems appropriate following completion of the PDI sampling; however, NW Natural is not currently proposing data replacement at any specific locations. EPA requests further discussion with NW Natural on the proposed data replacement approach before it can be approved for use in the US Moorings Project Area. EPA proposes this discussion take place separate from the PDIWP so as to not delay the data collection effort.
5. In response to PDIWP Specific Comment 15, the text in Section 4.2.7 states that it is unknown if the same three hydrologic zones identified at the immediately adjacent upriver Gasco and Siltronic properties (unconfined Fill water bearing zone [WBZ], Alluvial WBZ and bedrock) are present at the US Moorings property without additional characterization. NW Natural should recognize that if there are groundwater plumes discharging to the US Moorings Project Area with contaminant concentrations exceeding ROD Table 17 cleanup levels, these plumes and the extent of their impacts will need to be evaluated. Any necessary design-level data collection (e.g. porewater and groundwater data) can be deferred to the second phase PDI to inform capping evaluations.
6. In response to PDIWP Specific Comment 16, an editorial correction is requested in Section 4.2.9.2 to make (EPS 2016a) read (EPA 2016a).
7. In response to PDIWP Specific Comment 21, EPA’s contractor, CDM Smith, confirmed through Anchor QEA that the NW Natural team now has the necessary information to generate the requested figures in the original comment. EPA will review those figures to be provided in a revised PDIWP.
8. In response to PDIWP Specific Comment 30, the response provided in Appendix F is acceptable and should be incorporated into the Section 6.2.2 text, including a reference for the “numerous sites” where Anchor QEA has modeled sediment quality beneath caps.
9. In response to PDIWP Specific Comment 31, EPA will be reviewing the figures to be provided as noted in the PDIWP Specific Comment 21 response above.
10. In response to PDIWP Specific Comment 34, the response provided in Appendix F is acceptable and should be incorporated into the Section 4.2.1 text.

11. In response to QAPP General Comment 1, the requested field equipment maintenance information needs to be added to Section 3.6.1.
12. In response to QAPP Specific Comment 6, the Tables C-2 and C-3, C-6 were updated to add cleanup levels; however, the cleanup levels for 2,3,7,8-TCDD and 1,2,3,7,8-PeCDD are below the laboratory method detection limit. A table note should be added to address this item.
13. In response to QAPP Specific Comment 8, the requested content for Section 3.7, Instrument Calibration, was not added. Instead the section was deleted from the QAPP. Include the removed text (Section 3.7.1) and address the comment.
14. In response to QAPP Specific Comment 9, the requested change is partially addressed in the revised QAPP. The information requested in the first sentence of the comment is not included in the Section 3.8 text. Please identify the specific location where this requested information is documented or add the information.

Please let me know if there are any questions or if you would like to set up a meeting to discuss.

Thanks,

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

From: Jen Mott <jmott@anchorqea.com>
Sent: Tuesday, August 4, 2020 4:13 PM
To: Young, Hunter <Young.Hunter@epa.gov>
Cc: rjw@nwnatural.com; pdost@pearllegalgroup.com; rbarth@anchorqea.com; Jason Cornetta <jcornetta@anchorqea.com>; Peterson, Lance <petersonle@cdmsmith.com>
Subject: RE: US Moorings Project Area Pre-Design Investigation Work Plan

Hunter,

The following email is provided on behalf of Ryan.

Below please find the download instructions for EPA review of the Final *Pre-Design Investigation Work Plan* (PDIWP) for the US Moorings Project Area. The PDIWP 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). An initial version of the PDIWP was submitted to the EPA on

June 5, 2020, and EPA provided comments on July 14, 2020. This revised version of the PDIWP incorporates the necessary revisions to address EPA's comments and provides a response to each of EPA's comments in Appendix F. NW Natural would like to expedite completion of the proposed first phase of data gaps sampling, so please let us know if/how the NW Natural team can support your review and approval.

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

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Jen Mott
Project Coordinator
Anchor QEA, LLC
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6720 S Macadam Ave, Suite 125, Portland, OR 97219 (formerly SW Macadam)
(503) 972-5014

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

Sent: Tuesday, July 14, 2020 4:32 PM

To: Jen Mott <jmott@anchorqea.com>

Cc: Bob Wyatt <rjw@nwnatural.com>; Patricia Dost <pdost@pearllegalgroup.com>; Ryan Barth

<rbarth@anchorage.com>; Jason Cornetta <jcornetta@anchorage.com>; Peterson, Lance <peterstone@cdmsmith.com>

Subject: RE: US Moorings Project Area Pre-Design Investigation Work Plan

[EXTERNAL EMAIL]

Jen, Bob and Ryan,

The version of the comments I sent is lacking a figure. Third times a charm. See attached.

Hunter Young

U.S. Environmental Protection Agency

Region 10 - Oregon Operations Office

Young.Hunter@epa.gov

(503)-326-5020

From: Young, Hunter

Sent: Tuesday, July 14, 2020 3:58 PM

To: Jen Mott <jmott@anchorage.com>

Cc: rjw@nwnatural.com; pdost@pearllegalgroup.com; rbarth@anchorage.com; Jason Cornetta <jcornetta@anchorage.com>; Peterson, Lance <peterstone@cdmsmith.com>

Subject: RE: US Moorings Project Area Pre-Design Investigation Work Plan

Jen, Bob and Ryan,

Previous email was sent to the wrong email thread (the SAR) so I am resending under the correct one (the PDIWP) to make tracking easier. Please see attached for EPA's comments to the US Moorings PDI WP. Consistent with Section 6 of the US Moorings Project Area Redial Design Statement of Work, the Final PDI WP is due 45 days from the date of this message. Please let me know if there are any questions or if you would like to set up a meeting to discuss.

Thanks!

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: Friday, June 5, 2020 2:01 PM
To: Young, Hunter <Young.Hunter@epa.gov>
Cc: rjw@nwnatural.com; pdost@pearllegalgroup.com; rbarth@anchoragea.com; Jason Cornetta <jcornetta@anchoragea.com>; Peterson, Lance <peterstone@cdmsmith.com>
Subject: US Moorings Project Area Pre-Design Investigation Work Plan

Hunter,

The following email is provided on behalf of Ryan.

Below please find the download instructions for EPA review of the *Pre-Design Investigation Work Plan* for the US Moorings Project Area. The *Pre-Design Investigation Work Plan* 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). NW Natural would like to expedite completion of the proposed first phase of data gaps sampling, so please let us know if/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.

USMS0002526

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