



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ENVIRONMENTAL CLEANUP

June 13, 2017

Sent via email only

Subject: The Environmental Protection Agency (EPA) Draft Baseline Sampling Plan for Portland Harbor

Dear PCI Group, State of Oregon, City of Portland, NW Natural, Federal PRPs,

Thank you for expressing interest and willingness to participate in the early phases of the Portland Harbor Record of Decision (ROD) implementation. EPA is committed to working with you to implement this critically important work as we look to parties to take early actions to accelerate cleanup and redevelopment at Portland Harbor. Consistent with our conversations with you during the release of the ROD, the EPA plans to continue working with you to identify possible cost reductions through the flexibility afforded by the final decision tree.

On June 6, 2017, we received the Pre-Remedial Design Group's pre-remedial design proposal. From an initial review we can see that the proposal identifies important parameters and data needs that would advance the allocation process, and has overlap with EPA's Draft Sampling Plan. We believe the proposal serves as a great starting point for our upcoming discussions, and for that reason encourage the Pre-Remedial Design Group to share the June 6th proposal with others on this communication.

In furtherance of our mutual goal of returning this site to productive reuse as quickly as possible, attached is EPA's Draft Sampling Plan for Pre-Remedial Design, Baseline and Long-Term Monitoring for the Portland Harbor Superfund Site (Draft Sampling Plan). The Draft Sampling Plan incorporates and builds upon the sampling framework and objectives for initial post-ROD baseline sampling that the EPA shared with you in March. We believe this Draft Sampling Plan will provide the baseline and hot-spot data refinement that is necessary to establish benchmarks for the Portland Harbor In-Water Remedy.

EPA worked with the Portland Harbor Technical Coordination Team (TCT) to develop our Draft Sampling Plan. Specific elements of the Draft Sampling Plan include:

- Preliminary Remedial Design (RD) Characterization: Focus on delineating the horizontal and vertical extent of contamination associated with sediment management areas (SMAs) identified in the ROD, and evaluating the effectiveness of monitored natural recovery in some areas of the Site. This component is meant to initiate the RD process and gather information necessary for the PCI to finalize its allocation process.
- Baseline Monitoring: To update existing site-wide conditions and serve as the basis for comparison to data collected during the long-term monitoring program.
- Long-Term Monitoring: To compare Site conditions against baseline conditions and cleanup levels to assess the performance of remedial actions.
- Anadromous and Migratory Fish Tissue Monitoring (i.e., lamprey, salmon, and sturgeon): To evaluate the tribal fish consumption exposure scenario as part of the 5-year review process.

Some elements are presented in more detail to foster discussion, however many aspects have been left for further development by respondents. For example, the draft preliminary RD characterization plan represents what EPA proposes would be needed for full RD. We understand that much surface and subsurface definition likely is not necessary to finalize the allocation; therefore, we are open to discussing your ideas of the scope of sediment sampling to meet that objective short of full design.

The Draft Sampling Plan does not describe the detailed sampling and analysis procedures necessary to implement the various characterization and monitoring programs, but is a guide for the development of detailed project plans, including those to implement the sampling programs. The performing parties will need to prepare investigation-specific planning documents including: work, field sampling and analysis plans; standard operating procedures; and quality assurance and health and safety plans to describe the sampling rationale, data quality objectives, sampling procedures, analytical methods, and data analysis approach. These plans will require EPA and partner review to ensure they meet the requirements ultimately outlined in a negotiated Administrative Order on Consent and Sampling Plan.

EPA's goal is to initiate sampling before the end of 2017. We are providing this Draft Sampling Plan for your review and consideration, and would like to arrange a meeting with you to discuss the June 6th proposal and EPA's Draft Sampling Plan within the next two weeks. During that meeting the parties can engage in greater detail on the rationale and interests upon which the proposed pre-remedial design and the Draft Sampling Plan are based. After that time, EPA will initiate a 60-day negotiation period on a draft Administrative Order on Consent, Statement of Work, and the Sampling Plan.

EPA looks forward to working with Portland Harbor PRPs on finalization of details and ultimate implementation of a pre-Remedial Design Sampling Plan for the Portland Harbor Superfund site. If you have questions or concerns prior to our meeting, please contact me or Sean Sheldrake of my staff at (206) 553-1220 or via email at Sheldrake.sean@epa.gov.

Sincerely,



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