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ENVIRONMENTAL CLEANUP

LWG
LOWER WILLAMETTE GROUP

July 12, 2012

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 June 2012

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 JUNE 2012

None.

Deliverables Approved by EPA

None.

Deliverables Submitted to EPA and Other Actions

- On June 7, 2012, LWG provided a response to Oregon Department of Environmental Quality's (DEQ's) May 21, 2012 email regarding the May 10, 2012 hot spots meeting.
- LWG provided the remaining GIS information requested by U.S. Environmental Protection Agency (EPA) on June 7, 2012.
- LWG provided draft Feasibility Study (FS) errata to EPA on June 7, 2012.
- LWG provided a protectiveness criterion for the evaluation of alternatives memorandum to EPA on June 7, 2012.
- LWG provided a potential hot spots buried contamination Transition Zone Water (TZW) screening analysis memorandum on June 14, 2012.
- A hot spots meeting was held with DEQ and the Department of Justice (DOJ) on June 15, 2012.

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- LWG provided a response to EPA's June 22, 2012 comments on the May 2, 2011 draft final Baseline Human Health Risk Assessment and request for an extension of the deadline to invoke dispute resolution on June 29, 2012.

Comments/Documents Provided by EPA

- On June 5, 2012, DOJ provided feedback on the LWG's May 4, 2012 background document on hot spots in the Portland Harbor Feasibility Study.
- On June 11, 2012, DEQ provided a memorandum on identifying hot spots for chemical classes.
- On June 22, 2012, EPA provided comments on the May 2, 2011 draft final Baseline Human Health Risk Assessment.
- On June 29, 2012, EPA provided a response to the LWG's June 29, 2012 letter requesting an extension of the deadline to invoke dispute resolution on EPA's comments on the draft final Baseline Human Health Risk Assessment.

2. PROBLEMS ENCOUNTERED, ANTICIPATED DELAYS, AND SOLUTIONS

None.

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 July, August, September, and October 2012 includes the following:

- July 2012: Comments on significant issues from EPA on draft final Baseline Ecological Risk Assessment expected
- July/August 2012: Redline strike-out comments expected from EPA on draft final Remedial Investigation
- July 2012: Initial EPA feedback on draft FS expected

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) 972-5014.

Sincerely,

Jennifer Woronets
LWG Administrative Project Coordinator

Copies: Jim Anderson, ODEQ (email only)
Matt McClincy, ODEQ (email only)
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LWG Management
LWG Repository

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

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
None			

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.	
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	

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
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.	
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.	

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
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
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

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
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
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	
EPA Directed Draft Feasibility Study (FS) Key Work Product	01/15/2012	Submitted 01/16/2012	NA

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
Draft Feasibility Study (FS) - Electronic Version For Early EPA Team Review	03/20/2012	Submitted 03/20/2012	6/29/2012
Draft Feasibility Study (FS) - Formal Publically Accessible Submittal	03/30/2012	Submitted 03/30/2012	6/29/2012
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; EPA comments received 06/22/2012	7/2/2011
Draft Final BERA	7/5/2011	Submitted 07/01/2011	9/1/2011
Human Health and Ecological Risk Management Recommendations	July 2011	Submitted 07/22/2011	9/22/2011

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
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.	
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	

Deliverable[1]	Submittal Deadline[2]	Status/ Comments	EPA Comments Target Date
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
BIOLOGICAL ASSESSMENT			
Preliminary Draft Site-Wide Biological Assessment - Electronic Version For Early EPA Team Review	3/30/2012	Submitted 03/20/2012	6/29/2012
Preliminary Draft Site-Wide Biological Assessment - Formal Publically Accessible Submittal	3/30/2012	Submitted 03/30/2012	6/29/2012

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Deliverable completed and approved by EPA.
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