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Subject: Fw: DEQ Comments on Harbor Oil Draft RI Report

FYI

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Date: 05/19/2010 03:20 PM
Subject: DEQ Comments on Harbor Oil Draft RI Report

Chris, the following are DEQ comments on the draft RI Report. I will be out of the office until next Tuesday. Paul Seidel was called to active duty in Louisiana and won't be back until mid July so any risk related discussion will need to wait for his return.

1. General Comment . Since the site has a history of halogenated compounds in oil, and oil combustion has been used, and fires have occurred on site, polychlorinated dibenzodioxins and dibenzofurans should be included as site chemicals of interest. This likely represents a data gap for bioaccumulative contaminants.

2. General Comment. Aquatic life dependent wildlife receptors were not included in the risk assessments. Mink and Osprey are two potential receptors; mink is sensitive to PCBs and Osprey is a fish-eating bird.

3. General Comment . Additional data collection is needed for Force Lake sediment and tissue, and soil vapor intrusion, as these two pathways are not fully assessed. The sediment investigation is not complete, and sediment data are few and exceed both toxicity and bioaccumulation-based criteria; therefore Force Lake is likely contributing to body burdens for wildlife. The case that TCE is originating from offsite sources

has not been made. The location near the former truck washing building suggests this as a likely source. Co-located soil vapor in ambient air and groundwater data could resolve these questions as well as assessing current vapor intrusion risk. (see comments #2, #6 , #8 and #9 in DEQ 1/22/10 comment letter on HHRA/ERA)

4. General Comment . TPH-based human health risks have not been evaluated. (see comment #7 in DEQ 1/22/10 comment letter on HHRA/ERA)

5. ES.1 Last Bullet . The current stormwater system also treats the collected stormwater with an oil/water separator prior to discharge.

6. ES.2 Fourth and Fifth Bullet . If there are saturated zones between water bearing zones that suggests that the water bearing zones are likely hydraulically connected.

7. Section 1.3.2.2 1950s . This section indicates that cattle trucks were cleaned in the onsite cement washing basin and so may be an onsite source for DDT.

8. Section 1.3.3.3 2000 EPA Site Inspection . The detection of LNAPL in onsite would constitute a "hot spot of contamination" under Oregon cleanup law because it is mobile and not reliably contained and therefore has a higher preference for treatment.

9. Section 1.3.3.4 CEC Soil Sampling . Data collected by CEC in the footprint of the new base-oil plant was considered unusable for the RI. The soil is stockpiled onsite and has been sampled as part of the RI. However, the location of these PCBs has not been associated with a source area and is not further discussed even in a general manner.

10. Section 2.0, page 53, First Series of Bullets . These bullet items are described as Remedial Action Objectives. DEQ disagrees that these four bullets are RAOs that should be medium-specific goals for protecting human health and the environment and that provide a framework for assembling and evaluating remedial action alternatives. In DEQ practice, RAOs are included in a Feasibility Study to provide a framework for assembling and evaluating remedial action alternatives. The four bullets look more like remedial investigation goals.

11. Section 2.3.1.3 Water Level and Free Product Measurements . Table 2-2 lists onsite wells and water level measurements and product thickness measurements. Add a map that is actually readable that shows the site and the monitoring wells that were used for this RI report; Figure 2-1 is far too tiny and cluttered to make sense of well locations and consider contaminant migration. The map(s) should show the all of the wells that have had any kind of measurement in them that figures into the nature and extent, and fate and transport of chemicals in groundwater (such as the EW-series), as well as extent of NAPL. For extent of NAPL, there should be some consideration of whether there is any relationship between water levels and top of screened interval, and presence of NAPL in wells and ultimately extent of NAPL.

12. Section 2.8.3 and 2.8.4 PAHs and PCBs . The text refers to "DEQ's Columbia Slough Sediment Project". The reference cited may be a DEQ document, but the sediment project was conducted by the City of Portland.

13. Section 3.3.1 Force Lake Drainage Basin . This section indicates that there are only two point discharges to Force Lake and all other discharges are nonpoint stormwater. This model does not acknowledge groundwater discharge to Force Lake.

14. Section 3.4 Geology . The name of the licensed geologist responsible for the geologic discussion in this document should be provided per Oregon licensing requirements; the name and stamp should appear in the document. The groundwater to surface water pathway should include a more appropriate cross section than Figures 3-2 and 3-3 or those presented in the Preliminary Site Characterization Report for the Harbor Oil Site, August 8, 2008. A geologic cross section should have been prepared for this site that extends from the northeast side of the site and at least through the center of Force Lake constructed parallel to direction of groundwater flow. Evaluation of this pathway would consider distribution of LNAPL and other contaminants in the three water bearing zones, which of those zones may be discharging into Force Lake, and where groundwater discharge occurs (see comment #10 in DEQ 1/22/10 comment letter on HHRA/ERA).

15. Section 4.2 Potential Facility-Related Sources . It is not clear why the footprint area of the new base-oil plant is not a potential source when that is where the stockpiled soil containing PCBs originated from.