

DEQ Milestone Report

Information about the Source Control Table

Use Of This Sheet

This spreadsheet is intended to track and share information regarding the status of current and potential future upland source control measures. Information is logged by the status of the evaluation in each pathway. The following pathways are included: overland transport, bank erosion, groundwater, stormwater, overwater activities, and other (see definitions below). Sites included in this spreadsheet are currently being investigated under DEQ oversight or a recent source control decision made for the facility. For more information on these sites please visit DEQ's Environment Cleanup System Information (ECSI) database at <http://www.deq.state.or.us/wmc/ECSI/ecsiquery.htm>

Definitions

Potential contaminant migration pathways

Overland Transport = Uncontrolled sheet flow of water and other material to the river from a site.

Bank Erosion = Erosion of material within the sloping bank areas of the site to the river.

Groundwater = Groundwater plumes or discharges to the river either via seeps or through preferential pathways.

Stormwater = Stormwater discharges to the River that originates from a pipe (permitted or unpermitted).

Overwater Activities = The storage or use of hazardous substances over the water (i.e., storage tanks on docks, permanent work activities conducted over water), that if released would be a potential current or future source of contamination to the river.

Pipelines and other conveyance systems are not considered in this category. Releases from these types of systems need to be reported to the state Oregon Emergency Response System (OERS) system.

Other = Pathway examples: wastewater discharges, air deposition, direct discharges.

Priority levels for pathways and sites

High = High priority pathways and sites are those where a complete contaminant migration pathway exists and the upland source is significantly impacting the river or poses a significant and imminent threat to the river based on initial evaluation of key source control prioritization factors (listed on p. 4-3 JSCS). A primary consideration is that one or more media (soil, water, air) significantly exceed applicable Screening Level Values (SLVs) at the point of discharge to the river (e.g., water at the end of a discharge pipe, or soil or material at the riverbank) or the most reliable and cost-effective data point (e.g., groundwater measured at the shoreline), or where a bioaccumulative chemical is detected at concentrations significantly above the SLV. In addition, if an upland source is violating DEQ narrative water quality criteria for the Willamette River, the site may be considered a high priority. High priority sites are expected to move forward with aggressive source control measures without delay or be subject to enforcement action.

Medium = Medium priority pathways and sites are those where a complete contaminant migration pathway exists and the upland source is impacting the river or poses a significant and/or imminent threat to the river based on an initial evaluation of key source control prioritization factors (listed on p. 4-3 JSCS). A primary consideration is that one or more media exceed applicable SLVs, but not significantly, at the point of discharge to the river, or where a bioaccumulative chemical is detected at concentrations above the SLV. Although exceedance of SLVs does not necessarily indicate a site poses a significant and/or imminent threat or needs to immediately implement source control measures, it does indicate that the site may pose a threat to human health or the environment and that additional evaluation may be needed to determine if source control measures are required to prevent, minimize or mitigate the migration of hazardous substances to the river. If the site exceeds one or more SLVs, the need for further characterization or for implementation of source control measures will be based on a site-specific weight-of-evidence determination. Medium priority sites are expected to perform a weight-of-evidence evaluation to determine if source control measures are required.

Low = Low priority pathways and sites are those where upland data indicate, based on an initial evaluation of key source control prioritization factors (listed on p. 4-3 JSCS), that the site likely poses a low threat to the river (e.g., concentrations are near or below SLVs) or where DEQ, in consultation with EPA, may issue an upland "No Further Action" (NFA) determination or lower the State's priority of the site for further upland investigation or remedial action under DEQ's cleanup authority. Source control measures will not be required at low priority sites unless determined necessary by the results of the Portland Harbor RIFS or ROD.

p High = DEQ's preliminary determination is that this is likely a high priority pathway or site based on available information; pending formal source control evaluation determination.

p Med = DEQ's preliminary determination is that this is likely a medium priority pathway or site based on available information; pending formal source control evaluation determination.

p Low = DEQ's preliminary determination is that this is likely a low priority pathway or site based on available information; pending formal source control evaluation determination.

Shading

 = Upland Source Control Decision has been completed for the specified pathway at this site.

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Pick Lists

Pick lists are used to facilitate the addition of information to the spreadsheet. A pick list is a list that can be used by the project manager to select an entry from a group of designated choices. Pick lists will appear as a pull down menus in the lower right corner for the following fields: *Project status, Status of SCE, Schedule for Completing SCE, Completeness of pathway to the river, Pathway priority level, Site priority level, Source control alternatives evaluation and schedule, Selected SCMs, Mass or volume of contaminants controlled, and Operation and maintenance requirements*. The pick lists for these fields are shown below.

| Project Status |
|----------------|
| PA |
| XPA |
| RI |
| FS |
| RD / RA |
| NFA |
| PPA |
| CNFA |

| Status of SCE |
|--------------------|
| Ongoing |
| Not Started |
| Pending EPA Review |
| Completed |
| N/A |

| Schedule for completing SCE |
|---|
| No current schedule. SOW under development, due (type date). |
| SOW currently being implemented. |
| (PM description of schedule) |
| N/A |

| Pathway determination |
|--|
| Pathway is complete |
| Insignificant pathway; no actions recommended |
| Waiting on SCE to be completed |
| No known current sources (spills will be reported to OERS) |
| (PM description of source and pathway) |
| N/A (use when the pathway does not exist at the site) |

| Alternatives evaluation and schedule |
|--|
| no alternatives evaluation needed |
| draft evaluation report: (m/y) |
| schedule for completing final evaluation report: (m/y) |
| evaluation to be part of upland FS; schedule for completing draft/final: (m/y) |
| alternatives evaluation completed (m/y) |

| Priority level |
|---|
| High |
| Medium |
| Low |
| p High |
| p Med |
| p Low |
| to be determined |
| none (use if SCE determined the pathway to be incomplete) |

| Status of EPA "Partners" Review of SCA Decision |
|---|
| EPA reviewed and commented. |
| Review Pending. SCA submitted (type date). |
| SCA to be submitted on (type date). |
| Public Comment period (type date) to (type date). |
| SCA submitted to EPA (type date). No comments. |
| N/A |

| Selected SCMs |
|--------------------------|
| No SCM needed |
| (PM description of SCMs) |
| N/A |

| Mass/Volume of contaminants controlled |
|---|
| cubic yards of soil removed |
| square feet of area capped |
| linear feet of plume controlled at riverbank |
| linear feet of riverbank stabilized |
| gallons of product recovered |
| (PM description of mass/volume/area controlled) |

| Status of EPA review of SCE decision |
|---|
| Review pending; SCE submitted (m-y) |
| Waiting on SCE completion (m-y) |
| SCE to be submitted to EPA on (m-y) |
| To be determined |
| SCE submitted to EPA (m-y); no comments |
| N/A |

| Operation and Maintenance requirements |
|--|
| periodic inspection and maintenance |
| effectiveness monitoring |
| site use restrictions |
| (PM description of operation/maintenance requirements) |
| none |

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Acronyms & Abbreviations

| | |
|------------|--|
| Agr | Agreement |
| AOC | Administrative Order on Consent |
| AS/SVE | Air sparge soil vapor extraction |
| AST | Above ground Storage Tank |
| BMPs | Best Management Practices |
| BRA | Baseline Risk Assessment |
| CNFA | Conditional No Further Action |
| ECSI | Environmental Cleanup Site Information |
| FS | Feasibility Study |
| GW | Groundwater |
| IGA | Inter-Governmental Agreement |
| JSCS | Joint Source Control Strategy |
| NA | Not Applicable |
| NFA | No Further Action |
| OF | Outfall |
| p&t | Pump & Treat |
| PA | Preliminary Assessment |
| PH | Portland Harbor |
| PH Agr | Portland Harbor Agreement - a formal agreement for a RI and SC |
| PH Ltr Agr | Portland Harbor Letter Agreement - an initial contract covering DEQ oversight costs and limited investigation and cleanup activities |
| PM | Project Manager |
| PPA | Prospective Purchaser Agreement |
| RD/RA | Remedial Design/Remedial Action |
| RI | Remedial Investigation |
| RI/FS | Remedial Investigation/Feasibility Study |
| SC | Source Control |
| SCD | Source Control Decision |
| SCM | Source Control Measure |
| SLV | Screening Level Value |
| SOW | Scope of Work |
| SVE | Soil Vapor Extraction |
| TCA | Trichloroethane |
| UST | Underground Storage Tank |
| WO | Waiting on |
| XPA | Expanded Preliminary Assessment |

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