



Source Control in the Lower Willamette River

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Presentation Overview

- Key Issues in Achieving Source Control in Portland Harbor
- Coordinating Cleanup and Water Quality Permitting
- Integrating the Downtown Portland Sediment Characterization study into Oregon DEQ's Source Control Vision
- What Are the Next Steps for the DPSC Report?



Source Control Process

- Guided by 2001 MOU with EPA and other parties (DEQ in lead)
- Identify and control sources in advance of in-water ROD to prevent delay and recontamination of sediment cleanups
- Coordinate decisions with EPA Source Control Coordinator



Source Control Challenges- Technical

- No in-water remedial approaches determined
- No cleanup goals beyond conservative screening levels
- No consensus approach on evaluating fate, transport, and loading for key pathways
- Managing source control expectations associated with multiple commenting parties



Source Control Challenges- Other

- Allocation is afoot
- Frequent delays in RI/FS. Wait until RI? ROD? Will I do too much?
- Bioaccumulation- use of background/baseline concentrations?
- What part of remedy is cleanup, what is for other programs (TMDL, MS4 programs)
- Stormwater management
- Integrating habitat restoration (NMFS consultations in RI/FS process)
- Efficiency- inability to cleanup the whole site at one time



Completing Source Control Decisions

- Utilize existing screening values as targets for SC to move measures forward, use upcoming PRGs from RI report as “close out” numbers
- Use removal authority for hot spots/high priority sources
- Team approach for consistency, use of BES staff for review of stormwater work through IGA for stormwater RI
- Transition remaining voluntary agreements to enforcement orders for projects that are lagging
- Complete sign offs/NFAs with reopeners based upon results on inwater ROD and establishment of cleanup criteria and Sediment Management Areas



Stormwater Source Control Strategy

1. Source identification
2. Stormwater pathway evaluation and source control using DEQ guidance
3. Identify role of stormwater in final RI
4. If needed, create geographic general stormwater permit for Lower Willamette, addressing PCBs, solids.



DEQ's Stormwater Cleanup Guidance

- Statewide guidance, based largely upon Portland Harbor and Columbia Slough efforts
- Describes stormwater pathway evaluation process
- Outlines approach and decision criteria for determining when stormwater source control is required or achieved
- Depending on finding of RI, establish geographic general permit to manage remaining and long term stormwater discharges



Source Control Progress- the Good News

- Several state of the art Stormwater treatment systems are in place or in design stages to reduce PCB sources to the Willamette (GE, OSM, others)
- New retaining/barrier wall and associated upland removals completed at Arco site
- Feasibility Study approved for large scale barrier wall at NWN Gasco facility
- In situ treatment of TCE plume at Siltronics
- Comprehensive investigation commencing in Albina River Lots area to address PCBs
- Stormwater investigations being completed at most sites in program- BES investigations helping to prioritize site discovery and cleanup.



Upriver Source Control- Goals of Downtown Portland Sediment Project

- Preliminary Assessment level report
- Evaluate ambient concentrations of contaminants in sediment.
- In consideration of ambient concentrations, identify areas of sediment deposition in excess of acceptable HH and Ecological screening levels, and related hotspot concentrations. Initiate additional investigation as needed
- Develop a strategy to treat or remove hot spots, and control remaining sources to levels protective of HH and the environment.
- Evaluate whether sediment in the reach poses a recontamination threat to the PH Study Area.



Downtown Portland Sediment Characterization- next steps

- Interim report being evaluated by participating partners (City of Portland, Bureau of Environmental Service, City of Portland, Parks and Recreation, Oregon Department of Environmental Quality, PacifiCorp, Portland General Electric, TriMet, Zidell Marine Corporation)
- Final report to DEQ in January
- DEQ public meeting to discuss results of study, source control status, and other Lower Willamette River studies
- DEQ to review report and recommend next steps for



Downtown Portland Sediment Characterization- next steps

DEQ to review report, including:

- Baseline risk screening
- Evaluating of spatial distribution of contaminants relative to sources and sample locations (outfall, side channel, mid channel)
- need for source identification and associated additional inwater characterization in some areas to better delineate impacts and remedial options
- Need to extend scope of geographic stormwater permit to address similar risk drivers to the Harbor



