

Completion Summary for City of Portland Outfall Basin 10A

1 Summary

The City of Portland (City) has been addressing source control concerns related to the City conveyance systems for more than four decades, and several City programs have evolved to meet changing regulatory requirements and watershed health objectives. Following the 2000 listing of Portland Harbor on the National Priorities List, the City initiated a new partnership with the Oregon Department of Environmental Quality (DEQ) Cleanup Program to identify specific sources of contaminants to City stormwater conveyance systems in the harbor that were not being adequately controlled. This report summarizes the results of this collaborative effort in Outfall Basin 10A.

This Completion Summary includes a weight-of-evidence evaluation to demonstrate that source evaluation is complete and that there are no current (or anticipated future) major sources of contaminants to the Willamette River.

Basin 10A is located on the west side of the river in the Pearl District near downtown Portland. Historically, this outfall drained a small stretch of NW Naito Parkway; in 2008, a new residential development connected to the system.

River sediment in the vicinity of the outfall does not contain elevated concentrations of any contaminants (i.e., the U.S. Environmental Protection Agency [EPA] has not identified the potential need for sediment remediation). One DEQ Cleanup Program site is located within the basin. Following site investigation and remediation, DEQ determined that no further action was needed at this site. The site was redeveloped in 2008, under requirements in the City's Stormwater Management Manual (SWMM), as residential property with stormwater controls. No known or suspected contaminant sources to the Basin 10A stormwater conveyance system have been identified.

The City concludes that that no source investigation is warranted in this basin, and that the existing programmatic source control measures (SCM) in the basin are sufficient for ensuring discharges from Outfall 10A are protective of the river. Therefore, the City has met the remedial investigation (RI)/SCM objectives for Basin 10A.

2 Introduction

This Completion Summary presents a weight-of-evidence evaluation of whether further source investigation is needed in Basin 10A, and the rationale for concluding that current and future discharges from the basin are not likely to be significant sources of contaminants to river sediment. The purpose of this report is to demonstrate that, for Basin 10A, the City has met the joint RI/SCM objectives of the August 13, 2003, intergovernmental agreement (IGA) between the City and DEQ.

This report is included in Appendix A of the *Municipal Stormwater Source Control Report for Portland Harbor* (Municipal Report), which provides additional background and detail regarding

the City's harborwide stormwater source control efforts, including regulatory and non-regulatory programs to address current and future sources and to minimize recontamination potential.

3 Outfall and Basin Setting

3.1 Basin Location and Configuration

Outfall 10A discharges to the west side of the Willamette River near River Mile 11.6, approximately 150 feet downstream of the Broadway Bridge. The drainage area for the Basin 10A conveyance system is approximately 2.9 acres within Portland's Pearl District. Until 2008, the drainage basin included only a small area of NW Front Avenue (now called NW Naito Parkway). The basin expanded in 2008 when stormwater drainage from the newly constructed Waterfront Pearl condominiums was routed to the system. Figure 1 shows the location of the outfall and current drainage basin boundary and provides an overview of the associated stormwater conveyance system.

3.2 Land Use and Potential Upland Sources

Land use adjacent to Basin 10A has transitioned from industrial to mixed residential/commercial as part of the Pearl District redevelopment. A portion of the Waterfront Pearl condominiums comprises approximately 1.2 acres of the basin, and the remainder of the drainage area consists of a paved right-of-way (NW Naito Parkway) within commercial and general employment¹ zones.

No current pollutant sources have been identified in Basin 10A. The current basin includes a portion of one site that completed investigation and remediation activities under the DEQ Cleanup Program, as listed in DEQ's Environmental Cleanup Site Information (ECSI) database. This site, the Waterfront Pearl Condominiums Construction Site (ECSI #4535), was remediated in 2007 and received a No Further Action determination from DEQ (DEQ, 2007). This site did not discharge to the City's stormwater conveyance system until after redevelopment for residential use in 2008. No other ECSI sites are located in the basin.

Because there are no industrial operations in the basin, no sites in the basin currently hold National Pollutant Discharge Elimination System (NPDES) permits to discharge to the Basin 10A conveyance system. The National Railroad Passenger Corporation (Amtrak) previously (1998-2003) held an NPDES 1200-Z permit to discharge to the Basin 10A conveyance system via a historical connection to the basin; this connection from the Amtrak site was rerouted to Basin 11 in about 2003. Note that the City has an NPDES Municipal Separate Stormwater Sewer System (MS4) stormwater permit that covers basin drainage areas.

¹ General employment is a Portland zoning category that allows a range of employment opportunities but emphasizes industrial and industrial-support uses. The zones can allow for the transition to a less industrial overall nature.

3.3 Outfall Setting

Outfall 10A discharges near the upstream end of the Portland Harbor Superfund Site. The outfall is not located within or adjacent to any reach identified by EPA as an area of potential concern (AOPC) for contaminant concentrations in river sediment (EPA, 2010).

4 Basin Screening and Source Investigations

Basin screening consisted of an evaluation of current and past land use, as described in Section 3. Because only one site discharges to the basin and that site has been remediated and redeveloped for residential use, the City concluded that major sources were not present and no source investigations were needed in Basin 10A.

5 Completion of Source Identification

The lines of evidence evaluated to confirm that source evaluation objectives have been met with regard to Basin 10A include (1) inriver sediment concentrations near the outfall, (2) information on potential sources of contaminants, and (3) drainage basin characteristics and land use. Findings from this evaluation are summarized below:

- *Inriver Sediment Concentrations.* River sediment in the vicinity of Outfall 10A does not contain elevated concentrations of any contaminants (i.e., the outfall does not discharge to an AOPC).
- *No Upland Sources:* Basin 10A contains no known or suspected major sources of contaminants to the City stormwater conveyance system (e.g., active DEQ Cleanup Program sites or NPDES-permitted facilities). The only DEQ Cleanup Program site in the basin was not connected to the City's conveyance system until after site investigation and remediation were completed under DEQ oversight. The site is now residential and has stormwater treatment, installed as part of the redevelopment. There are no other upland sites within the basin.
- *Drainage Basin Characteristics and Land Use.* Basin 10A is small (2.9 acres). Drainage is limited to treated stormwater from the condominium development and a portion of NW Naito Parkway that is adjacent to high-density residential developments. These land uses have a low potential for offsite migration of contaminants to Basin 10A.

The weight-of-evidence evaluation summarized above indicates that the Basin 10A source evaluation is complete and no additional source tracing is warranted.

6 Basin Source Controls

Because no known or suspected major sources were identified in Basin 10A, additional coordination between DEQ and the City to identify control mechanisms was not needed in this basin. The Waterfront Pearl Condominiums Construction site, which is the only site in Basin 10A, was investigated and remediated under DEQ oversight and redeveloped under the SWMM. Site stormwater is treated before discharging to Basin 10A. Figure 2 displays the spatial extent of the upland site investigation and other programmatic site source controls in and around the basin (see key to figures provided at beginning of this Appendix). Although no

basin configuration changes are known at this time, any future connections would include stormwater controls as required under the SWMM.

Other municipal programs (e.g., street sweeping) likely provide additional source control benefits in the basin and will help to address minor sources for which specific control measures have not been required. City programs that control current and future contaminant discharges to the conveyance system are described in the Municipal Report.

7 Conclusion

Based on the information summarized above, there are no major pollutant sources in Basin 10A. Therefore, future discharges from Outfall 10A are unlikely to represent a significant source of contaminants to the Willamette River. The City therefore concludes that it has met the RI/SCM objectives of the IGA and requests a source control decision from DEQ for Basin 10A.

8 References

DEQ. 2007. DEQ Site Summary Full Report – Details for ECSI Site ID 4535, Waterfront Pearl Condominiums Construction Site. DEQ Environmental Cleanup Site Information (ECSI) Database, updated January 2007; accessed February 19, 2013.

<http://www.deq.state.or.us/lq/ECSI/ecsidetail.asp?seqnbr=4535>

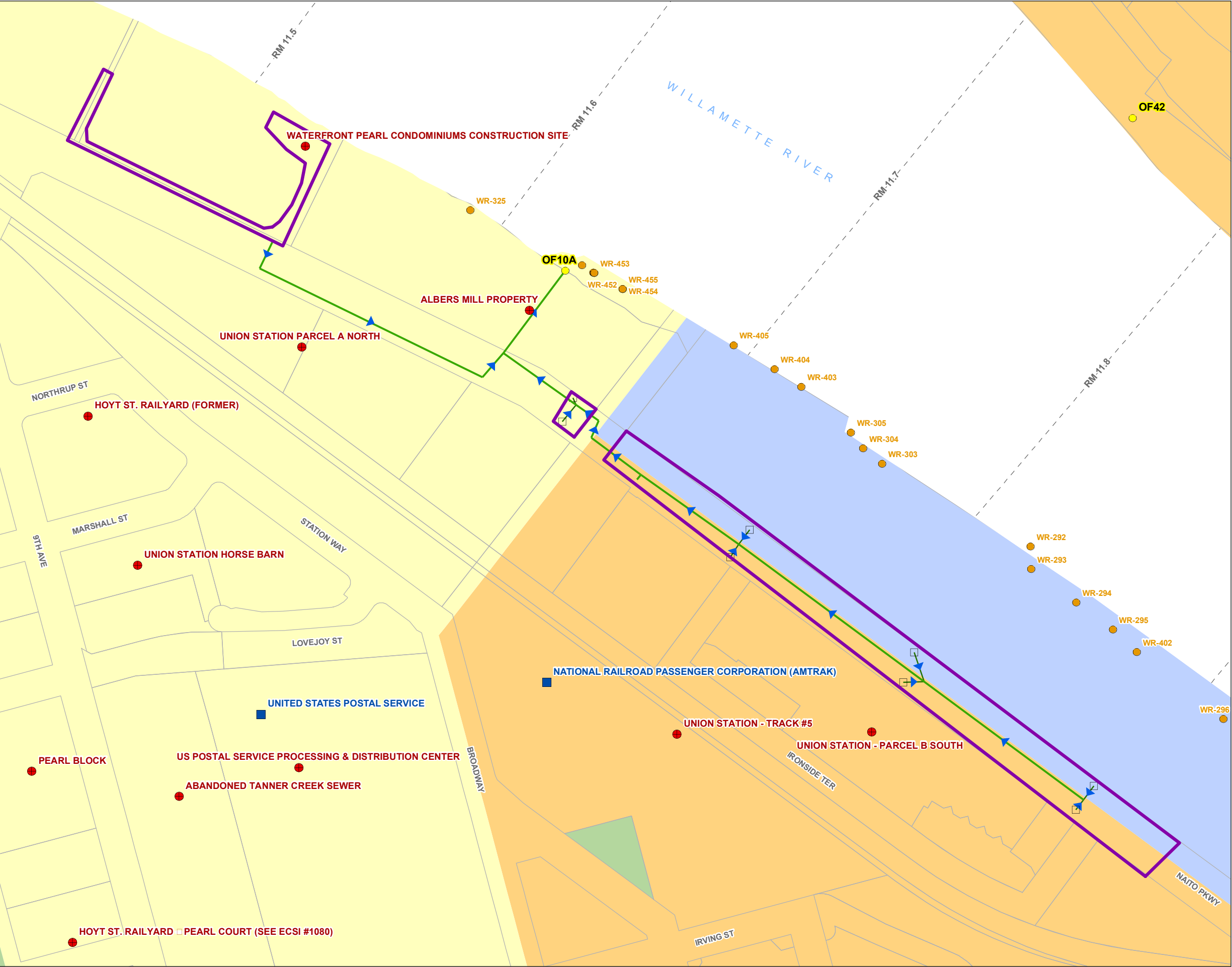
EPA. 2010. Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240. Portland Harbor Feasibility Study Source Tables. Letter from EPA to Mr. Bob Wyatt, Chairman, Lower Willamette Group. November 23, 2010.

List of Figures

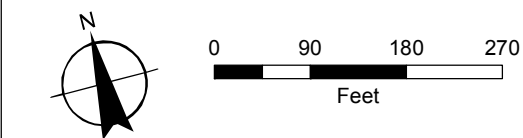
Figure 1: Basin 10A Overview

Figure 2: Basin 10A Upland Site Source Controls

FIGURE 1
Basin 10A
Overview



- Basin 10A
- DEQ ECSI Site
- NPDES Stormwater Permit
- Conveyance System**
 - Storm Line
 - Catch Basin
 - City Outfall
 - Non-City Outfall
- Land Use/Zoning**
 - General Employment
 - Commercial
 - Residential
 - Parks and Open Space
- All Other Data**
 - River Mile (RM)
 - Tax Lot
 - Discharges to City Outfall
 - Portland Harbor Hydroboundary



MAP NOTES:
Date: December 31, 2013
Data Sources: BES, METRO

 ENVIRONMENTAL SERVICES
CITY OF PORTLAND
1120 SW Fifth Avenue, Room 1000
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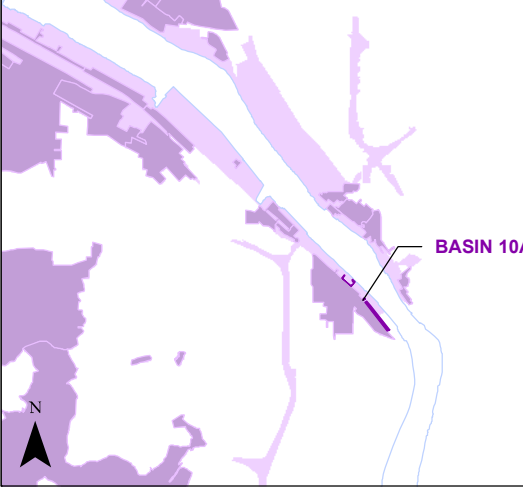
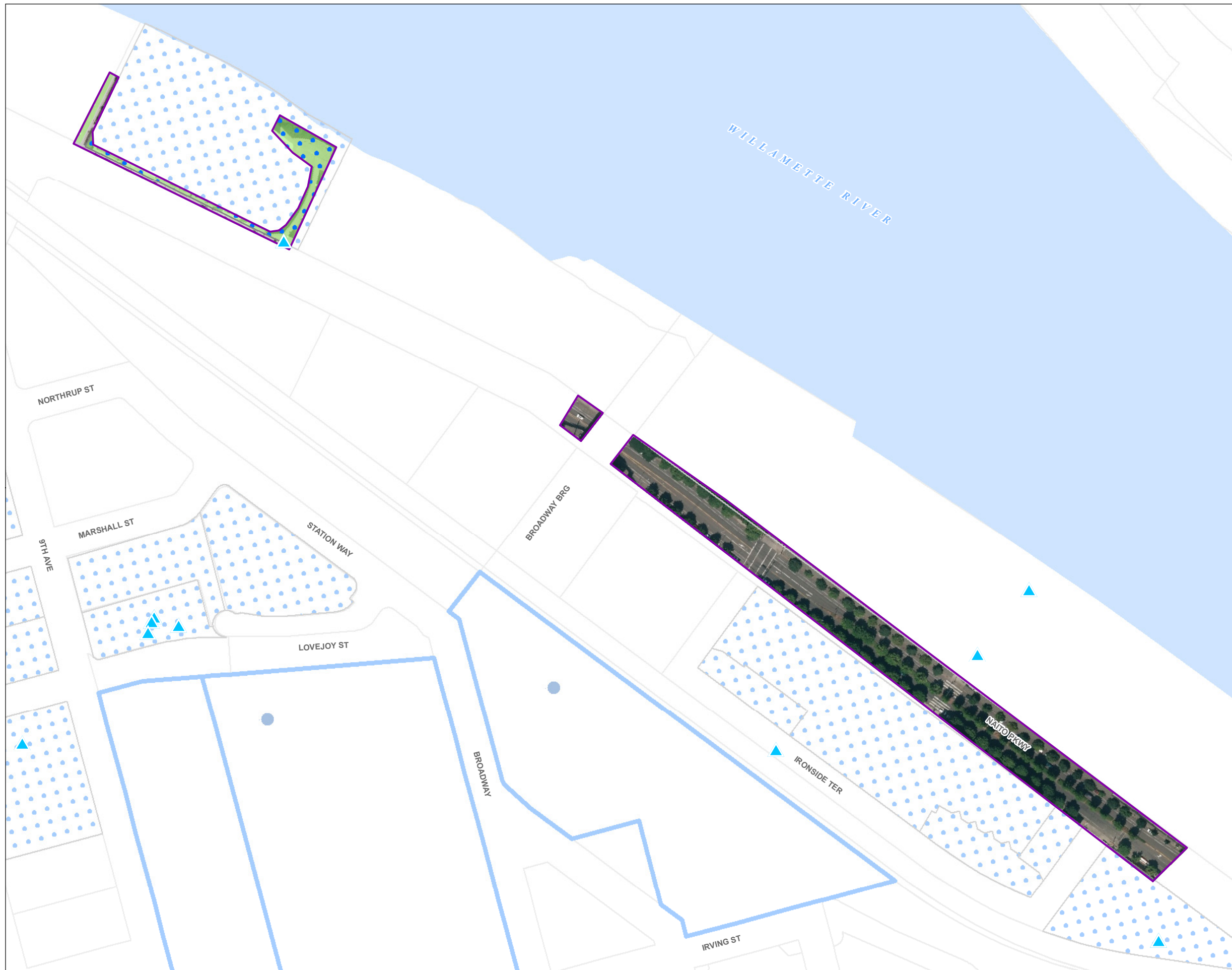
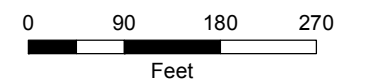


FIGURE 2
Basin 10A
Upland Site Source Controls



- Basin 10A
- Tax Lot
- DEQ Stormwater SCE**
 - SCE implemented or pending
- All Other Features**
 - NPDES Stormwater Discharge Permit
 - >50% of Site Area Redeveloped Under City SWMM
 - Stormwater Treatment Facility
 - Site Inspection - BES Industrial Stormwater Program
 - Discharges to City Outfall
 - Portland Harbor Hydroboundary



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Date: December 31, 2013
 Data Sources: BES, METRO,
 Aerial Photo Taken 2012



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