

Completion Summary for City of Portland Outfall Basin 22D

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 22D.

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

Basin 22D is located on the west side of the river in the Linnton area. The majority of the basin is open space within Forest Park and the remainder is residential properties with some drainage from State Highway 30 and a railroad corridor.

Although 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), the City collected and analyzed stormwater data from the basin and confirmed that source tracing was not needed. The Oregon Department of Transportation (ODOT) is evaluating discharges from Highway 30 under DEQ Cleanup Program oversight. The City concludes that major contaminant sources are not present and that ongoing implementation of programmatic source control measures (SCM) in the basin is sufficient for ensuring that discharges from Outfall 22D are protective of the river. Therefore, the City has met the remedial investigation (RI)/SCM objectives for Basin 22D.

2 Introduction

This Completion Summary presents a weight-of-evidence evaluation of whether further source investigation is needed in Basin 22D, 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 22D, 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 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 22D discharges to the west side of the Willamette River near River Mile 5.5, in the Linnton area. The drainage area for the Basin 22D conveyance system is approximately 242 acres. Figure 1 shows the location of the outfall and drainage basin boundary and provides an overview of the associated stormwater conveyance system.

3.2 Land Use and Potential Upland Sources

The majority of the land use in Basin 22D (92 percent) is open space (Forest Park), and the remainder is residential and major transportation (ODOT's Highway 30/NW St. Helens Road). Industrial properties are located between the highway and the river, adjacent to the outfall itself, but none of these properties discharges to Outfall 22D.

Sites in the DEQ Cleanup Program, as identified in DEQ's Environmental Cleanup Site Information (ECSI) database, were evaluated as potential sources of contaminants to the City stormwater conveyance system. A portion of one Cleanup Program site, ODOT - Portland Harbor Source Control Evaluation (ECSI #5437), is located in Basin 22D. This site, which encompasses all ODOT facilities within the Portland Harbor drainage basin, was added to the Cleanup Program in 2010, and a stormwater source control evaluation (SCE) is currently in progress (DEQ, 2012, 2013). The SCE will identify contaminants of interest and potential pathways to the river from the portion of Highway 30 within Basin 22D. No other Cleanup Program sites are located in the basin. In addition, no sites in the basin currently hold, or historically had, National Pollutant Discharge Elimination System (NPDES) permits to discharge to the Basin 22D conveyance system.¹

3.3 Outfall Setting

Outfall 22D does not discharge to a river reach identified by EPA as an area of potential concern (AOPC) based on results of river sediment sampling (EPA, 2010). Several non-City outfalls discharge in the immediate vicinity of Outfall 22D.

4 Basin Screening and Source Investigations

The City evaluated land use in the basin and concluded that the basin was not likely to contain major sources of contaminants. However, because of the relatively large basin size and the location of the outfall in an industrial area, the City collected and analyzed basin stormwater in 2008 to verify that source tracing was not needed. Based on the evaluation of these data and using a conservative screening approach, no analytes were identified as potentially warranting source tracing in Basin 22D (BES, 2010).

¹ The City and ODOT both have NPDES Municipal Separate Storm Sewer System (MS4) stormwater permits that cover basin drainage areas.

5 Completion of Source Identification

The lines of evidence evaluated to confirm that source tracing objectives have been met with regard to Basin 22D include (1) inriver sediment concentrations near the outfall, (2) stormwater screening results, and (3) land use. Findings from this evaluation are summarized below.

- *Inriver Sediment Concentrations.* River sediment in the vicinity of Outfall 22D does not contain elevated concentrations of any contaminants (i.e., the outfall does not discharge to an AOPC).
- *Stormwater Screening Results.* The City's stormwater screening evaluation (BES, 2010) did not identify any analytes as potentially warranting further source tracing in Basin 22D.
- *Land Use:* The vast majority of the basin consists of open space, and most of the remaining land use is residential. Major transportation land use areas are under evaluation by ODOT. The basin does not include industrial land uses.

Based on these lines of evidence, the City concludes that Basin 22D source investigation is complete and there are no major contaminant sources in the basin.

6 Basin Source Controls

Source control for potential sources in Basin 22D includes SCMs to be completed as needed under DEQ Cleanup Program oversight and ongoing City and DEQ programs that are described in the Municipal Report. Source controls implemented in Basin 22D are summarized in this section.

Figure 1 displays the spatial extent of DEQ Cleanup Program site investigations and other programmatic controls (see key to figures provided at beginning of this Appendix). As shown in Figure 1, a stormwater SCE is in progress at the one DEQ Cleanup Program site that is partially in the basin (ODOT). Because no other known or suspected major sources of contaminants were identified in Basin 22D, additional coordination between DEQ and the City to identify control mechanisms was not needed in this basin.

The basin includes stormwater treatment at some of the residential areas within the basin (see Figure 1). Ongoing municipal programs (e.g., street sweeping, etc.) 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

The City completed an evaluation of Basin 22D and determined that no major sources of contaminants to the City conveyance system are present. Therefore, the City concludes that it has met the RI/SCM objectives of the IGA and requests a source control decision from DEQ for Basin 22D.

8 References

- BES. 2010. Stormwater Evaluation Report. City of Portland, Bureau of Environmental Services. February 2010.
- DEQ. 2012. DEQ Site Summary Full Report – Details for ECSI Site ID 5437, ODOT - Portland Harbor Source Control Evaluation. DEQ Environmental Cleanup Site Information (ECSI) Database, updated November 2010; accessed January 29, 2013.
<http://www.deq.state.or.us/lq/ECSI/ecsidetail.asp?seqnbr=5437>
- DEQ. 2013. Milestone Report, Upland Source Control at the Portland Harbor Superfund Site. Prepared by the Oregon Department of Environmental Quality. January 2013.
- 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 22D Overview and Upland Site Source Controls

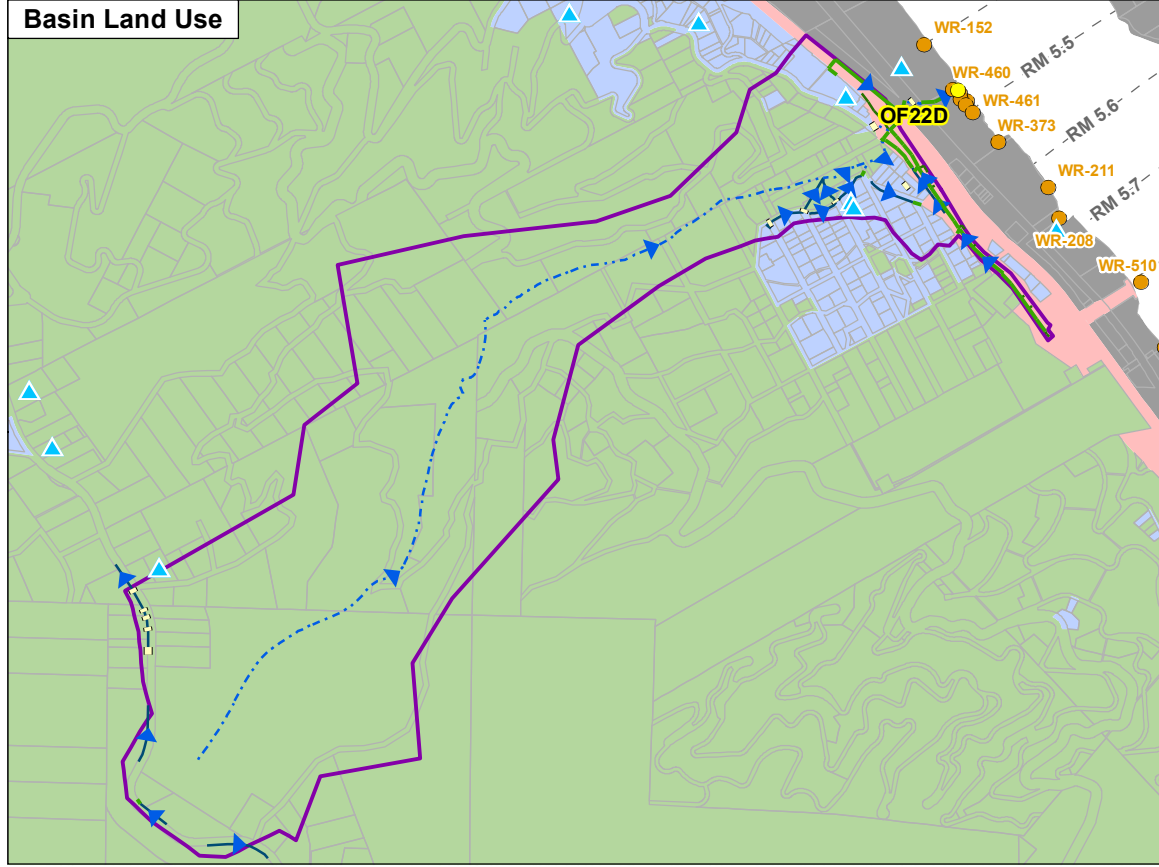
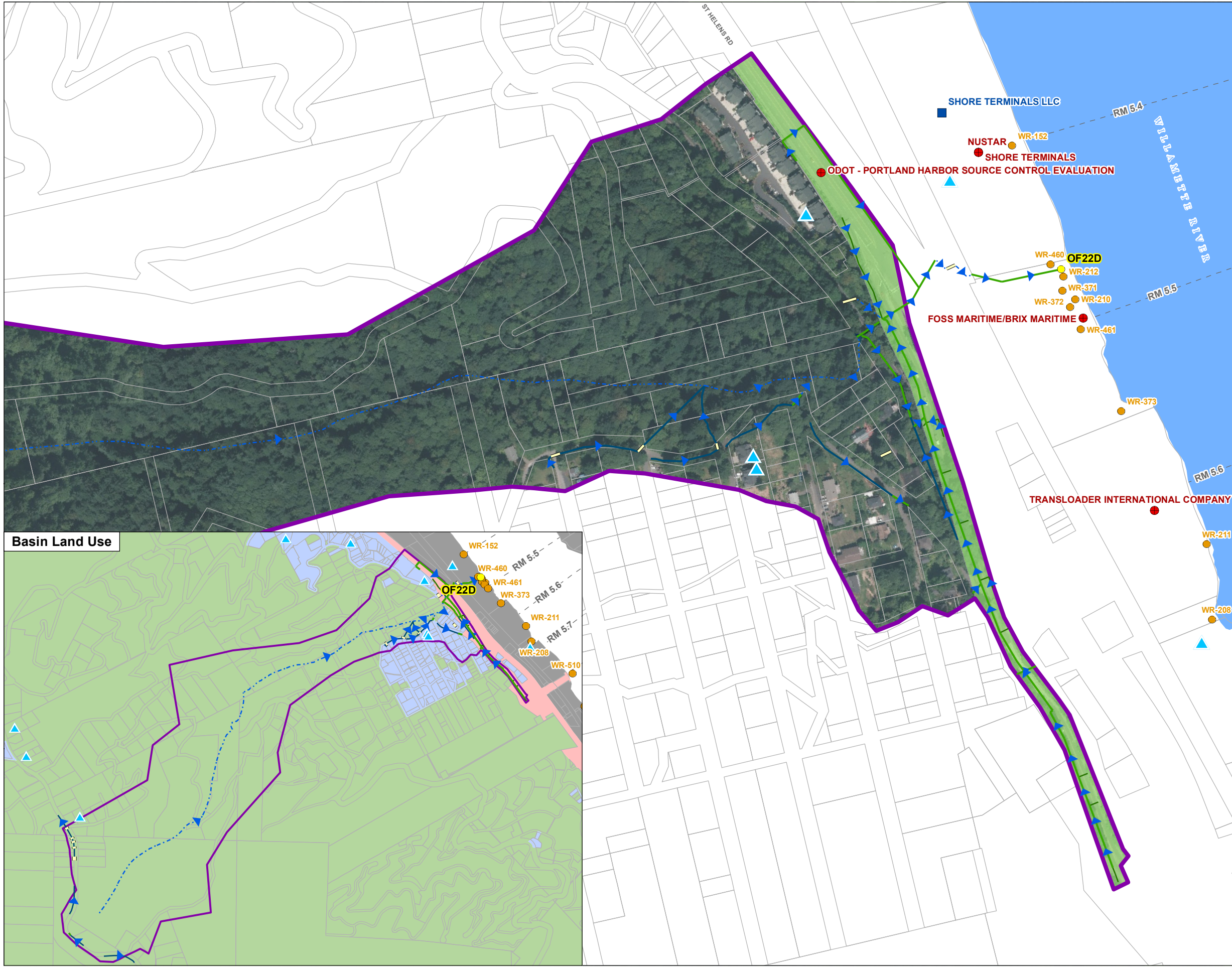
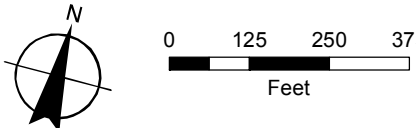


FIGURE 1
Basin 22D
Overview and
Upland Site Source Controls

- Basin 22D
- DEQ ECSI Site
- Stormwater Treatment Facility
- NPDES Stormwater Permit
- Conveyance System**
 - Storm Line
 - Culvert
 - Ditch
 - Channel
 - City Outfall
 - Non-City Outfall
- Land Use/Zoning (See Inset)**
 - Heavy Industrial
 - Residential
 - Parks and Open Space
 - Major Transportation
- DEQ Stormwater SCE**
 - SCE implemented or pending
- 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

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