

October 21, 2004
10077.009

Oregon Department of Environmental Quality
Northwest Region
2020 SW Fourth Avenue
Suite 400
Portland, Oregon 97201-4987

VIA Email

Attention: Anna Coates

**Subject: Progress Report – September 2004
Remedial Investigation/Feasibility Study/Interim Removal Action Measures
Astoria Area-Wide Petroleum Site
Astoria, Oregon
DEQ ECSI File #2277**

Dear Ms. Coates:

This letter presents the progress made by the PRP Group during September 2004 on RI/FS and IRAM Development at the Astoria Area-Wide Petroleum Site in Astoria, Oregon. This work is being conducted in response to DEQ Order No. ECSR-NWR-01-11.

WORK COMPLETED DURING SEPTEMBER 2004

Work continued on the technical memorandum describing Phase 2 soil characterization. This technical memorandum will be submitted concurrently with this progress report.

Water levels in all monitoring wells were measured in September. This completes the monthly water level monitoring program required in the Order. Preparation of the Third Quarter 2004 (4th Round) ground-water monitoring report began. With completion of the 4th Round of ground-water quality sampling, the ground-water monitoring requirements of the Order are satisfied. The ground-water database is sufficient to conduct risk assessment and evaluate remedial alternatives, if necessary. If further ground-water monitoring is deemed necessary, the PRP Group proposes to conduct this after the Remedial Investigation report is complete and specific monitoring objectives can be developed.

Data for conducting an aquifer response evaluation were collected in September by monitoring water levels in the Pier 2 surface water monitoring point while monitoring tidal response in several wells. Water levels in monitoring wells were measured over a 36-hour period to be sure to record responses in the aquifer to high and low tides.

Comments were received from the DEQ on the Level 1 Ecological Risk Assessment and the PRP Group has developed a response, which was submitted on October 18, 2004. Further evaluation of sediment characterization actions was put on hold pending receipt of current sediment data collected in the slips at the Port of Astoria by the Columbia River Estuary Study Task Force (CREST).

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Four permanent soil-gas monitoring points related to the vapor inhalation pathway assessment near the Port office were installed in September.

Implementation of the work plan for collection of data upland from the hydrocarbon seep in Slip 2 was initiated. Approximately 44 borings were drilled using cone penetrometer/rapid oscillation screening tool (CPT/ROST) techniques in the area where free-phase hydrocarbons have been observed in ground-water monitoring wells. The tidal monitoring program discussed above is part of this work plan. The interim product removal activities associated with the hydrocarbon seep IRAM were continued in September. The absorbent boom was modified to allow it to freely move with tides.

Preparation of an IRAM work plan to support a new commercial development at the former Niemi/Mobil Bulk Plant was initiated. This IRAM includes decommissioning of the underground storage tanks previously identified on the property.

A meeting of the PRP Group representatives was held on September 14. A meeting between the PRP Group representatives and DEQ representatives was held on September 16.

WORK PLANNED FOR OCTOBER 2004 AND NOVEMBER 2004

Documentation of the Phase 2 Soil Characterization will be completed and submitted to DEQ in October.

The report describing the results of the ground-water sampling for the Third Quarter 2004 (4th Round) event will be prepared in October and November. Evaluation of the tidal data and water levels measured in wells will be conducted in October and November.

Storm water sampling for the 2nd Quarter 2004 (4th Round) will be completed in October, depending on storm events. A report on these activities will be completed within 60 days of completion of sampling.

A response to DEQ comments on the Level 1 ecological risk assessment will be completed and submitted to DEQ. A follow-up response will be prepared once the analytical data for Slip 2 sediment samples are reviewed.

Sampling of the soil-gas monitoring points will occur in October. Analytical work and data validation will be completed in October and November.

Interpretation of CPT/ROST data will occur in October and November.

A report presenting the as-built diagrams of the installed IRAM will be prepared in October and November. The interim product removal activities associated with the hydrocarbon seep IRAM are scheduled to continue in October and November.

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Tasks related to preparation of the Remedial Investigation Report will continue in October and November.

Decommissioning of underground storage tanks at the former Niemi/Mobil Bulk Plant will be completed in November. The IRAM work plan for the commercial development will be completed in October and November.

PROBLEMS ENCOUNTERED AND RESOLUTIONS

There are no problems requiring resolution in August.

CLOSING COMMENTS

Please call me at (503)768-5121 if you have any questions or comments regarding this progress report.

Sincerely,
EnviroLogic Resources, Inc.

Thomas J. Calabrese

Thomas J. Calabrese, RG, CWRE
Principal/Hydrogeologist
Project Manager

cc: Distribution list attached

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