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May 2, 2019

VIA FEDERAL EXPRESS

Lori Houck Cora
Assistant Regional Counsel
U.S. Environmental Protection Agency
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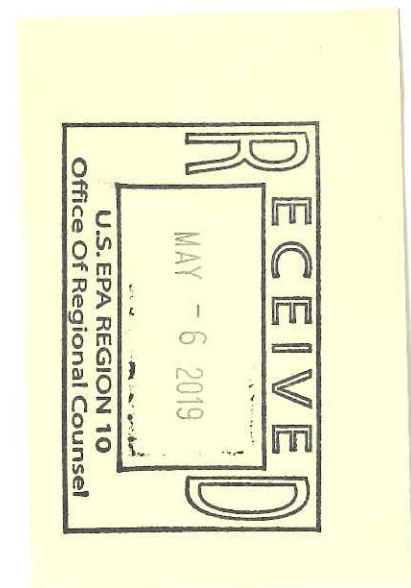
Re: Swan Island Lagoon Sediment Sampling; Portland Harbor Superfund Site; Portland, OR (PH Site)

Dear Ms. Cora:

On March 19, 2019, we provided the U.S. Environmental Protection Agency (EPA) Region 10 with a DVD containing sampling data collected within the Swan Island Lagoon (SIL) portion of the Portland Harbor Superfund Site by our client, Daimler Trucks North America LLC (DTNA) in October 2018. At that time, DTNA had not received the validated data. The March 19 DVD is incomplete, containing only the raw analytical data, Final Surface and Subsurface Sediment Field Sampling Plan, the Quality Assurance Project Plan, and related maps.

Data validation has finally been completed. The enclosed DVD contains the complete, final and validated DTNA Sediment Sampling Dataset, and replaces the March 19 DVD. Specifically, the enclosed DVD contains:

1. Final Surface and Subsurface Sediment Field Sampling Plan and Quality Assurance Project Plan
2. Final analytical laboratory data
 - a. EQuIS formatted Final EDDs
 - b. Level 2 and Level 4 data reports
3. Validated analytical data
 - a. EQuIS formatted Validated EDDs
 - b. Data summary spreadsheet (includes calculated totals)
4. Data validation reports
5. Final Surface and Subsurface Sediment Field Sampling and Data Report



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As we discussed on March 13TH, DTNA's objectives for performing this sampling work are to provide greater resolution of SIL high concentration area across from M-1 outfall (Study Area) and to produce comparable data to contribute to the SIL dataset. For this work, DTNA collected 131 surface sediment samples and 7 deep cores; 39 surface samples and 49 core samples were analyzed. The remaining samples have been archived for future analysis. This data will inform the remedial design process for the SIL and will support: (1) refinement of the SIL SMA footprint and technology assignments; (2) delineation of the extent of principal threat waste; and (3) evaluation of remedy effectiveness.

With this submittal, EPA can complete its review of the DTNA Sediment Sampling Dataset. We understand that ExxonMobil will be providing EPA with the data from its own sampling event at the head of the SIL. We further understand that following review of the DTNA and ExxonMobil data, EPA will schedule a meeting with DTNA and ExxonMobil to discuss its results. EPA's feedback on these two data sets will be important in DTNA's efforts to facilitate remedial design in the SIL.

Sincerely,

OGDEN MURPHY WALLACE, P.L.L.C.



Jennifer L. Sanscrainte

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Enclosure

cc: Davis Zhen (w/ enc / Via Federal Express)
Dean Ingemansen (w/o enc)