



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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SUPERFUND &
EMERGENCY
MANAGEMENT DIVISION

MEMORANDUM

DATE: February 28, 2022

SUBJECT: Response to DEQ Questions on Dioxins Memorandum
Northwest Pipe Company Facility, Portland, OR
ECSI #138
December 2021

FROM: Benjamin Leake, PMP *BJL*
Remedial Project Manager

TO: Jim Orr, RG
Project Manager
Oregon Department of Environmental Quality

The following are the United States Environmental Protection Agency's (EPA) comments pertaining to the memorandum with the subject, *Response to DEQ Questions on Dioxins*. The memorandum was produced by Haute-Géologie, LLC for Northwest Pipe Company (NWP), located in Portland, Oregon with a facility listed in the Oregon Department of Environmental Quality (DEQ) Environmental Cleanup Site Information (ECSI) database as #138. EPA comments are not separated into categories.

Comments

1. EPA appreciates the lines of evidence and detail presented in the memorandum. Using the Aquip treatment system TSS removal percentage as a surrogate for dioxin/furan removal is likely reasonable given the high sorption coefficient. However, the lack of empirical data from dioxin/furan sampling as evidence to support these conclusions is a significant shortcoming. Sediment concentrations of 2,3,7,8-TCDD and 1,2,3,7,8-PeCDD, which are focused contaminants of concern from Table 21 the Portland Harbor Record of Decision, exceed Remedial Action Levels in samples collected adjacent to Outfall 18.

Therefore, EPA requests four effluent samples from each of the two Aquip systems be performed with laboratory analysis for dioxins/furans. If the first two sampling events result in concentrations below clean up levels, EPA may consider a proposal to suspend the final two sampling events. EPA recommends analysis for all dioxin/furan congeners listed in the Record of Decision and the Joint Source Control Strategy. Laboratory analytical data are needed to properly evaluate the effectiveness of the source control measures and the risk of recontamination from the NWP site.