



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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SUPERFUND &
EMERGENCY
MANAGEMENT DIVISION

MEMORANDUM

DATE: January 24, 2023

SUBJECT: Dioxin/Furan Stormwater Sampling Summary - Second Event 2022
Northwest Pipe Company, Portland Plant, Portland, OR
ECSI #138
December 2022

FROM: Laura Hanna, RG *LH*
Remedial Project Manager

TO: Jim Orr
Project Manager
Oregon Department of Environmental Quality

The following are the United States Environmental Protection Agency (EPA) comments on the document titled *Dioxin/Furan Stormwater Sampling Summary, Second Event 2022*, Northwest Pipe Company, Portland Plant, dated December 2022. The document was prepared by Jacobs Solutions Inc. on behalf of Northwest Pipe Company, Portland Plant. The site is located at 12005 North Burgard Road, Portland, Oregon and is listed in the Oregon Department of Environmental Quality (DEQ) as ESCI No. 138. The sampling event occurred in September 2022 and was conducted in accordance with the DEQ-approved Dioxin/Furan Stormwater Sampling Work Plan (Work Plan) finalized in June 2022 (Jacobs 2022).

The site is located upland to the Portland Harbor at approximate River Mile 2.9 east within the International Terminal Slip (IT) of the Willamette River. The stormwater conveyance system at the site discharges to the City of Portland stormwater conveyance, which discharges to the Willamette River at City of Portland Outfall 18.

EPA understands that the purpose of the Sample Summary is to provide evidence that stormwater from the Northwest Pipe Portland Plant site is not a source of dioxin/furans to the IT Slip that could threaten future remediation efforts. The Sample Summary also proposes to suspend the final two sampling events described in the Work Plan based on results presented.

Comments are categorized as: "Primary," which identify concerns that should be resolved to achieve the assessment's objective; "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the assessment's objectives; and "Matters of Style," which substantially or adversely affect the presentation of the technical information provided in the SCE Report.

Primary Comments

1. At this time, EPA does not agree with the conclusion that the Northwest Pipe site is not a potential source for Portland Harbor recontamination from dioxins and furans, and insufficient data has been collected to date to support this conclusion. The Work Plan states that "If the first two sampling events result in concentrations below clean up levels, EPA and DEQ may consider a proposal to suspend the final two

sampling event” (Jacobs 2022). However, the concentrations of dioxins/furans presented in the Sample Summary are above the ROD CUL for TCDD-eq (EPA 2017). Northwest Pipe should proceed with conducting the remaining two stormwater sampling events in accordance with the approved Work Plan. The progress towards achieving the Portland Harbor remedial action objectives and applicable or relevant and appropriate requirements should be evaluated after a full set of data is collected from four stormwater sampling events, and this conclusion may be reconsidered at that time.

2. There is a large amount of sample data presented with “UB” qualifiers indicating that there was method blank contamination during laboratory analysis. During future data analysis, a discussion should be provided in the data quality evaluation regarding why method blank detections occurred along with the implications on the quality and usability of sample data.
3. The Sample Summary argues that “pristine water free of dioxins and furans” would exceed the ROD CUL for TCDD-eq due to the EPA rules for handling non-detect values (EPA 2021). However, this statement is not valid for this sampling event at Northwest Pipe site because there were several dioxins/furans detected above the method detection limit, indicating that stormwater leaving the site is not “pristine.” If all dioxins/ furans within a sample are non-detect then the summation would be the maximum non-detect value. When taking a summation of only detected values of dioxins/furans without considering the non-detect values, the ROD CUL for TCDD-eq is exceeded. This statement should therefore not be included in future data evaluations when detected concentrations of dioxins/furans are present above ROD CULs.

To Be Considered

1. The Sample Summary report and future evaluations of stormwater source control at the Northwest Pipe site should be limited to presenting stormwater sample results, comparisons to ROD CULs, and other specific lines of evidence that may inform future decision whether the quality of stormwater discharge is consistent with the PHSS remedial goals. Section 5 of the Sample Summary presents several paragraphs of non-site-specific discussion that diverges from the factual data presented. Consider omitting broad discussions and arguments on validity of CULs and instead focus on actual data collected and the effectiveness of treatment system which is useful information that will be considered in determining source control at this site.
2. The DEQ Joint Source Control Strategy Appendix D does not define 0.2 inch as a "heavy rain event" but rather identifies 0.2 inches as the minimum threshold for a qualifying storm event (DEQ & EPA, 2005).

References

- DEQ and EPA. 2005. *Portland Harbor Joint Source Control Strategy*. December.
- EPA. 2017. *Record of Decision Portland Harbor Superfund Site Portland, Oregon*.
- EPA. 2021. *Program Data Management Plan Portland Harbor Remedial Design Investigation – Portland Harbor Superfund Site*. December 2021
- Jacobs. 2022. *Northwest Pipe Company, Portland Plant ECSI No. 138, Dioxin/Furan Stormwater Sampling Work Plan, Final*. June 2022