

Table 1. Responses to Comments Received November 20, 2020 on the February 14, 2020 Source Control Evaluation (SCE) Report
 Northwest Pipe Company

DEQ's 19 November 2020 letter on the February 2020 SCE Report		Northwest Pipe Company (NWP) Response
General Comments	<p>As discussed in our recent conversations, DEQ anticipates issuing a proposed Source Control Decision following resolution of two issues; 1) the potential for dioxin/furans in stormwater to pose a risk to the river and 2) development of a Monitored Natural Attenuation (MNA) work plan for the groundwater pathway. The anticipated SCD will be conditional based on the MNA evaluation for the potential groundwater discharges of Volatile Organic Compounds (VOC) to Terminal 4, Slip 1. The MNA work is considered a Source Control Measure (SCM). The MNA evaluation is intended to support that natural attenuation of the groundwater plume is sufficient to prevent current and future impacts to the Willamette River.</p> <p>The MNA assessment will include additional monitoring wells installed in alignment with the groundwater transport direction's centerline. DEQ and NWP are currently considering the work necessary for a MNA work plan. If the MNA evaluation indicates exceedances of screening levels, then an onsite remedial evaluation may be required for a final SCD. DEQ does not anticipate issuing the SCD until approval and implementation of the MNA work plan.</p>	Noted.
Specific Comment 1:	<p><i>Executive Summary</i></p> <p>DEQ anticipates issuing a SCD following the approval and implementation of a MNA plan. The SCD will be dependent on the successful demonstration that natural attenuation is sufficient to prevent VOC groundwater impacts to the Willamette River. DEQ does not anticipate issuing a "Source Control Determination of No Further Action" as stated in the Executive Summary.</p>	Pursuant to the conversation between NWP and DEQ on 2/18/21, NWP understands that a SCD is anticipated when the MNA Work Plan is approved. In addition, NWP understands that the DEQ does not intend for the SCD to be contingent on "successful demonstration" of MNA.
Specific Comment 2:	<p><i>3.2 Outfall Sediment Data</i></p> <p>DEQ did not approve or oversee the NWP IT Slip sediment investigation and as such, does not concur with this section's assertions.</p>	Comment noted, however, previous direction from DEQ (see DEQ's letter on the Supplemental Groundwater Data Report dated 20 October 2017) indicated that "all data" be included in the SCE. As such, NWP included the sediment investigation along with the LWG samples. Furthermore, DEQ has accepted data and conclusions for this site from numerous Phase I and II ESAs that were not overseen or approved by DEQ at the time they were conducted. The text in Section 3.2 was revised to acknowledge that the work was done independent of DEQ oversight.
Specific Comment 3:	<p><i>3.3 Contaminant of Interest (COI)</i></p> <p>This section states that tributyltin not a COI for the Site. Based on the NWP Site's historical use for shipbuilding and possible use of tributyltin for coating ship hulls, DEQ considers tributyltin a COI for the Site. DEQ requests the revised SCE include DEQ's determination.</p>	The text will be revised to provide the various rationales explaining why tributyltin is not a COI for NWP. In addition, the list of COIs currently in the SCE is consistent with Table 5-2 from the approved Northwest Pipe Company Supplemental RI-SCE Work Plan (CH2M HILL 2009).

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<p><i>Specific Comment 4:</i></p>	<p>5.2.2 Southeast Area Groundwater</p> <p><i>DEQ disagrees with the hydrologic characterization on Page 5-8 that states the historic offsite location of Gatton Creek prevents it from acting as a preferential flow path. As requested in DEQ's review of the Vapor Monitoring Work Plan, additional investigation is needed to demonstrate former Gatton Creek is not acting as a preferential flow path. DEQ anticipates this data gap will be addressed as part of the MNA plan. DEQ requests the revised SCE to include DEQ's concerns and clarify how the issue will be addressed as part of the Vapor Monitoring Work Plan.</i></p>	<p>NWP has agreed to include DEQ's requested additional soil gas monitoring points as discussed in the 6 November 2020 meeting on the Passive Soil Gas Work Plan. The revised work plan was submitted on December 29, 2020 and approved by DEQ on January 6, 2021.</p> <p>The issue was raised prior to the approval of NWP's Passive Soil Gas (PSG) Sampling Work Plan, and NWP agrees that it will be addressed in the PSG efforts and the future MNA work plan.</p>
<p><i>Specific Comment 5:</i></p>	<p>Section 7</p> <p><i>Please add all additional lines of evidence as specified in Section 5.3 of the Joint Source Control Strategy. One such line of evidence is the potential preferably transport of groundwater through the system.</i></p>	<p>The potential for groundwater to be transported through the stormwater system was addressed in Section 2.1. However, the following lines of evidence as listed in Section 5.3 of the JSCS are now addressed in Section 7:</p> <ul style="list-style-type: none"> • Identification and characterization (e.g., type of release, area of release, size of release, age of release) of potential sources of contaminants; • Magnitude of storm water and storm water sediment exceedance at each sampling point and proximity of sampling point to the river; • Regional background soil concentrations of naturally occurring chemicals (i.e., metals) for evaluating storm water sediment; • Presence of bioaccumulative chemicals; • Site hydrology including consideration of but not limited to the following: <ul style="list-style-type: none"> ○ Site conditions (e.g., land use, surface conditions, topography); ○ Size of drainage (e.g., outfall) basin; and ○ Location and estimated size of discharge (river bank; direct to river); • Storm water system design (e.g., catch basin design and effectiveness) and management (e.g., BMPs, storm water management plan); • Maintenance and condition of conveyance system (e.g., frequency of catch basin and conveyance line cleanout); • Contaminant fate and transport (including chemical characteristics (e.g., solubility, partitioning coefficients), physical properties (e.g., density, viscosity) of the COIs); and • Estimate of potential contaminant loading to the river.

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Specific Comment 6:	<p>7.2.1.1 Offsite Recreational User Exposure Scenario</p> <p>DEQ disagrees that access to the slips by recreational fishing is only by boat. DEQ has observed bank fishing at the Head of the International Slip and fishing from boats is a regular occurrence. Please add to the SCE the information that there has been bank fishing and that boat access is a regular occurrence at T4 and the International Slip.</p>	<p>The 4th bullet has been edited to include bank fishing does occur by trespassers. It is already noted that the slip is considered private property and individuals are trespassing during such activities.</p>
Specific Comment 7:	<p>7.2.1.3 Ecologic Exposure Scenario</p> <p>Jacobs' conclusion that bioaccumulation of Site-related VOC associated with the groundwater pathway is insignificant does not acknowledge the Portland Harbor groundwater clean-up levels that are based non-bioaccumulative toxicity such as Aquatic Water Quality Criteria (AWQC). Please clarify the statement regarding bioaccumulation and discuss the exceedances of all Portland Harbor groundwater CULs/JSCS SLVs.</p>	<p>This is addressed in Table 7-4 and Section 7.2.1.3.</p> <p>Table 7-4 compares groundwater results with Portland Harbor surface water and groundwater CULs, JSCS SLVs, and DEQ's ecological risk assessment Level 2 SLVs (for aquatic organisms, birds, and mammals).</p> <p>Exceedances of these are described in SCE Section 7.2.1.5.</p> <p>Section 7.2.2.3 discusses which exposure pathways 'were' evaluated and which pathways 'were not' evaluated in the Level I Scoping ERA. Text has been clarified to indicate that the bioaccumulation/food chain exposure pathway 'was not' evaluated in the ERA and why.</p> <p>The sources of the screening levels selected are presented in Section 7.2.2.4 with results of that screening discussed in Section 7.2.2.5.</p>
Specific Comment 8:	<p>8.0 Findings and Conclusions</p> <p>Site characterization data do not support the statement that groundwater in the Southeast Area is identified and characterized. NWP has agreed to perform MNA to characterize the VOC groundwater. VOC groundwater contamination sources in the Southeast Area are not well characterized. Significant VOC contamination remains onsite. Please clarify the statement in the revised SCE.</p>	<p>Text will behas been edited, to state that groundwater in the Southeast Areas has been characterized sufficiently to support decision-making. Supplemental data will be collected as needed to inform additional well locations as part of the MNA remedy.</p>
Specific Comment 9:	<p>Stormwater Curve Screening Figures 7.2a through 7.2k</p> <p>Stormwater screening from 2012-2018 used only maximum, minimum, and average stormwater sampling data. All screening should use individual data points. Please correct the figures to reflect individual data points and include a discussion of the results in the stormwater evaluation. Include these changes in your resubmittal of the SCE.</p>	<p>Figures werewas edited as requested.</p>

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<p><i>Comment 1:</i> Remove or revise the inaccurate statement regarding stability of the groundwater plume in Section 5.2.2 of the SCE Report. The statement "Based on the stability in the relative distribution of VOCs within the plume, and the consistently low to nondetectable results for VOCs detected in Port wells, with concentrations lower than reported previously, the plume extent is stable and possibly shrinking, with some variation in concentration increasing or decreasing, within the interior of the plume" is not supported by the data presented in this report. Concentration plots in Figure 5-9a, 5-11a, and 5-12, show increasing VOC concentrations at NWP site monitoring wells MW-02, MW-03, MW-05, and MW-06. These increases must be correctly described and/or addressed with information from a statistical data evaluation of trends. Additionally, the well network downgradient of MW-03 is not sufficient to demonstrate that the plume is stable or possibly shrinking. VOC and other MNA parameter data should be collected over the extent of the plume during the planned MNA program to support the evaluation of plume stability.</p>	<p>The following sentence has been deleted: "Based on the stability in the relative distribution of VOCs within the plume, and the consistently low to nondetectable results for VOCs detected in Port wells, with concentrations lower than reported previously, the plume extent is stable and possibly shrinking, with some variation in concentration increasing or decreasing, within the interior of the plume."</p>	
<p><i>Comment 2:</i> The groundwater flow discussion Section 5.2.2 of the SCE Report should be revised to clearly describe potential preferential pathways that could influence groundwater flow. The historical location of Gatton Creek should not be the only preferential pathway considered. During deposition of the channel, the creek likely migrated and deposited more transmissive deposits in other channels that could act as preferential pathways to the river. The discussion in Section 5.2.2 suggests that there is an isolated pocket of more transmissive material, but given its location, it may indicate channel deposits from historical locations of Gatton Creek. The evidence as presented is not conclusive whether other vestiges of the former channel may exist and create preferential pathways for migration outside the monitoring network. Note that this discussion is related to the groundwater discussion in Section 6.2.2.1 and Figure 3-1 of the RI. Figure 3-1 could be improved in the context of this discussion by including the location of the groundwater monitoring wells.</p>	<p>NWP has agreed to include DEQ's requested additional soil gas monitoring points as discussed in the 6 November 2020 meeting on the Passive Soil Gas Work Plan. The revised work plan was submitted on December 29, 2020 and approved by DEQ on January 6, 2021.</p> <p>The issue was raised prior to the approval of NWP's Passive Soil Gas (PSG) Sampling Work Plan, and NWP agrees that it will be addressed in the PSG efforts and the future MNA work plan.</p> <p>Additionally, NWP added the locations of the groundwater monitoring wells to RI Figure 3-1, as requested.</p>	
<p><i>Comment 3:</i> The statement in Section 7.1.2.5 of the SCE Report that stormwater from the Northwest Pipe Company Site does not reach the Willamette River is misleading and should be removed or revised. The IT Slip is part of the Portland Harbor Superfund Site (PHSS) and is required to adhere to the same source control and remedial action requirements described in the Portland Harbor Record of Decision (ROD) (EPA 2017) as other portions of the Willamette River. As described in Section 7.1.2.5, stormwater discharging to the quiescent water in the IT Slip is more likely to settle near Outfall 18/WR-123 than stormwater that discharges to areas with higher flow rates and greater connectivity to the main channel of the Willamette River. This highlights the importance of controlling contaminant concentrations in stormwater that discharges from the Northwest Pipe Company Site because these</p>	<p>The statement in the SCE Report has been revised to state that stormwater from the Northwest Pipe Company site does not reach the main stem of the Willamette River. As EPA indicates, the hydrodynamics of the IT Slip near Outfall 18/WR-123 inhibit potential contaminant migration beyond a localized area near the outfall.</p>	

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	<i>contaminants will potentially settle below the outfall and could result in a localized area of recontamination if stormwater sources are not controlled. The conclusions in Section 7.1.2.5 should be reframed to describe the recontamination risk near the outfall because of the hydrodynamics in the IT Slip.</i>	
Comment 4:	<i>An evaluation of dioxins and furans in stormwater discharge should be presented in the SCE Report. Three of the six focused contaminants of concern identified in Table 21 of the ROD are dioxin/furan compounds, and there is a surface water cleanup level in Table 17 of the ROD for dioxins/furans (2,3,7-8-TCDD equivalent). Additionally, during 2018 pre-design investigation/baseline sampling, 1,2,3,7,8-PeCDD was detected in the IT Slip near Outfall 18/WR-123 at concentrations above the ROD remedial action level for sediment. Accordingly, the SCE Report should describe past and current site activities that may have produced dioxins/furans and include a performance evaluation of stormwater treatment source control measures at removing dioxins/furans. The performance evaluation can be accomplished either by collecting stormwater samples at SP-001 and SP-002 and analyzing for dioxins/furans, or through a review of case studies (if available) with analytical data to evaluate the performance of the AQUIP stormwater filtration system in removing dioxins/furans.</i>	<i>NWP has developed a memorandum in response to this comment, which is attached. The memorandum includes a discussion of sources of dioxin/ furans, their fate and transport in the environment, water treatment, and the effectiveness of the NWP AQUIP filtration system. NWP is performing a literature review of relevant case studies and working with AQUIP representatives to demonstrate that the AQUIP stormwater filtration system is effective in removing dioxins/furans.</i>
Comment 5:	<i>The statement in Section 8.1.3 of the SCE Report "groundwater containing detectable COIs on the Site poses no threat to the Willamette River and therefore, is contained, and an MNA program is being developed to demonstrate ongoing effectiveness" should be revised. Additional data at the leading edge of the plume, downgradient of well MW-03, are needed to demonstrate the extent of the plume and that natural attenuation processes are an effective means of containment.</i>	<i>The SCE addendum will <u>was updated to</u> include a discussion of the uncertainty regarding the downgradient edge of the plume, and the investigation utilizing soil gas monitoring to reduce that uncertainty. <u>Results of the PSG investigation are presented in the Passive Soil Gas Investigation Results and Proposed Well Locations Memorandum, Jacobs 2021.</u></i>
Comment 6:	<i>The natural attenuation data presentation in Figure 5-13 of the SCE Report is misleading and should be revised. The plot in Figure 5-13 shows that VOCs are not detected at monitoring well T4S1MW-22, inferring complete natural attenuation of VOCs 1,000 feet away from the river. However, well T4S1MW-22 is a well that is cross gradient of the plume axis and unsuitable to include in the data presentation. No well exists along the plume axis directly downgradient of NWP site monitoring well MW-03, which is a significant data gap for evaluating performance of a potential MNA source control.</i>	<i>A soil gas investigation has been implemented <u>planned</u> to determine the locations for additional monitoring wells along the plume axis in the area <u>between MW-03 and T4S1MW-03S and T4S1MW-09</u>. These wells will support the upcoming MNA Work Plan for evaluating the performance of MNA source control. <u>The MNA Work Plan includes the installation of additional wells at locations requested by DEQ and EPA, Section 8.1.3 of t</u>r<u>e SCE will <u>was</u> updated to describe these steps in the investigation and the figure will <u>was</u> updated.</u></i>

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EPA To Be Considered (TBC) Comments		Response
<p><i>Comment 1:</i></p> <p><i>Corrections are needed for the following values in Table 3-4 of the SCE Report that were found to be at or in excess of ROD cleanup levels (CULs) or incorrectly screened against CULs for the indicated constituent and are organized by page number of the table:</i></p> <p><i>a. (p 6 of 22) Cis-1,2-Dichloroethene in the highlighted cell for well MW-02 is below the ROD CUL.</i></p> <p><i>b. (p 6 of 22) Trichloroethene (TCE) found in sample GP-111 is at the ROD CUL.</i></p> <p><i>c. (p 9 of 22) Total cPAHs found in wells MW-01 and MW-02 exceed the ROD CUL and the cells should be highlighted.</i></p> <p><i>d. (p 12 of 22) Benzene found in samples GP-203-W-0 and GP-203-W-1 is in excess of the ROD CUL and the cells should be highlighted.</i></p> <p><i>e. (p 12 of 22) Tetrachloroethene (PCE) found in sample GP-204 is at the ROD CUL.</i></p> <p><i>f. (p 13 of 22) Arsenic found in wells MW-7-61512, MW-7-53113, MW-8, and MW-9-53113 exceeds the ROD CUL.</i></p> <p><i>g. (p 16 of 22) PCE found in well MW-02-072517 exceeds ROD CUL.</i></p> <p><i>h. (p 16 of 22) Vinyl chloride found in wells MW-02-10216, MW-02-020117, and MW-02-120518 is in excess of the ROD CUL.</i></p>	<p>Screening values were updated as requested with the notation that the total values include laboratory-estimated concentrations below the reporting limit. It should be noted that the PH CULs were modified by Errata #2 (U.S. Environmental Protection Agency (EPA). 2020. <i>Errata #2 for Portland Harbor Superfund Site, Record of Decision Table 17</i>) following submittal of the document.</p>	
<p><i>Comment 2:</i></p> <p><i>The drainage basin boundaries shown in Figure 2-4 of the SCE Report appear to be incorrect in the southern portion of the site based on roof drain downspout locations, catch basin locations, and storm drain flow directions shown in the figure. The drainage basin boundaries should be reviewed and if necessary, revised based on the flow patterns of the existing stormwater conveyance system.</i></p>	<p>The drainage basin boundaries in Figure 4-2 were reassessed and confirmed to be correct. The downspouts at the southern end of the building are slightly different than the rest of the building. There are four downspouts between each bay, numbered 1 through 4, east to west. Between all the bays, downspout 1 ties into the storm drain line that flows into Drainage Basin II. Between Bays 1 & 2 and Bays 2 & 3 downspout 2 ties into the storm drain line that flows south and connects to the line that flows west on the southern end of the building and into Drainage Basin I. The rest of the bays go into Drainage Basin II.</p>	
<p><i>Comment 3:</i></p> <p><i>Section 6.4 of the SCE Report states that the required stormwater treatment system capacity is 55,034 gallons, based on modeling consistent with the City of Portland Stormwater Management Manual and that the northwest and northeast treatment systems have storage capacities of 35,383 and 27,977 gallons, respectively. Because these are independent treatment systems, it would be helpful to present the required storage capacity for the independent basins instead of a total system capacity. Although the combined storage capacity of the two basins exceeds the total required system capacity, it is unclear if there is enough storage capacity in</i></p>	<p>The two treatment systems have sufficient capacity on a basin scale. The northwest treatment system has a total storage capacity of 35,383 gallons, 868 gallons greater than required (StormwaterRx, 2011). The northeast treatment system has a total storage capacity of 27,977 gallons, 7,458 gallons greater than required (StormwaterRx, 2011). Sufficient capacity has also been proven over the past nine years of operations.</p>	

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	<p><i>each independent basin. This analysis should include review and possible revisions to stormwater basin delineation as described in To Be Considered comment #2.</i></p>	<p>The text was modified to include this information.</p>
<p><i>Comment 4:</i></p>	<p><i>Section 8.1.4 of the SCE Report states, "Stormwater at the Site poses no threat to the Willamette River and, therefore, any potential sources of contamination to stormwater at the Site are contained" is misleading and should be removed or rephrased. Potential sources of contamination to stormwater must be controlled through ongoing implementation of source control measures and best management practices, and threat to the river (i.e., recontamination potential and threat to in-water receptors) is evaluated based on continued long-term effectiveness of these measures.</i></p>	<p>The statement with the following context will be edited in underline and strikeout, as indicated:</p> <p>Northwest Pipe Company is committed to continue to implement improved stormwater management practices and SCMs and monitor the effectiveness of these activities. <u>In addition to the two stormwater treatment systems</u>, Northwest Pipe Company facility management uses a Preventive Maintenance program, a CMMP, implementation of NPDES BMPs, and corporate environmental oversight as its normal course of business. <u>As such</u>, stormwater at the Site poses ed no threat to the Willamette River and, therefore since any potential sources of contamination to stormwater at the Site are contained <u>and Site stormwater is treated prior to discharge</u>. Adequate measures are in place to ensure source control and good stormwater management measures continue <u>into</u> the future.</p>
<p><i>Comment 5:</i></p>	<p><i>The argument presented in Section 8.1.5 of the SCE Report is misleading and should be rewritten. Outfall 18/WR-123 discharges into the IT Slip, which is a receiving water included as part of PHSS. The size of the potential area affected by stormwater discharges (estimated as 1.2 acres in this section) is not adequate evidence to conclude that stormwater is unlikely to result in sediment recontamination or contribute to unacceptable risk to in-water receptors in the IT Slip. Stormwater analytical data should be referenced as a basis of conclusions regarding recontamination potential or in-water risk for contaminants that continue to exceed cleanup levels and screening level values.</i></p>	<p>Stormwater analytical data will be added to support the argument that stormwater discharge to the IT Slip is unlikely to result in sediment recontamination or contribute to unacceptable risk to in-water receptors.</p>
<p><i>Comment 6:</i></p>	<p><i>An explanation should be provided for why the reporting limits were so high for total polychlorinated biphenyls (PCBs) for stormwater samples collected before 11/30/18. As shown on Tables 7-1 and 7-3 of the SCE Report, the reporting limits before 11/30/18 ranged from 0.3 to 10.7 micrograms per liter (µg/L), whereas the ROD cleanup level is 0.0000064 µg/L, and the knee of the DEQ rank order curve for PCBs in stormwater at Portland Harbor Heavy Industrial sites is approximately 0.3 to 0.5 µg/L. At these reporting limits, even a non-detect result could be several orders of magnitude greater than the ROD cleanup level and at or above the knee of the rank order curve. Recent 1200-Z sampling data with more appropriate reporting limits (e.g., 0.063 µg/L in 2018 and 2019) suggest that PCBs are not present in stormwater at unacceptable concentrations, but limited conclusions can be drawn</i></p>	<p>Laboratory reporting limits are continually improving and the NPDES and SCE required reporting limits differ. NWP included data collected in the SCE as requested by DEQ. This direction resulted in reporting limits higher than present day screening values for some older data and NPDES data. However, as EPA noted, recent (2018 and 2019) results suggest that PCB concentrations in stormwater are not present at unacceptable concentrations.</p> <p>Future sampling, as with past sampling, will have reporting limits consistent with regulatory expectations or use an alternative analytical</p>

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	<i>from previous sampling with high reporting limits. Future sampling conducted under the 1200-Z permit should have appropriate reporting limits or use an alternative analytical method for evaluating PCB data and potential risk for recontamination of the Willamette River. EPA expects source control investigations to be conducted with laboratory analyses that apply the best commercially available analytical techniques and appropriate sampling methods, as described in Section 3.3 of the Joint Source Control Strategy (DEQ and EPA 2005).</i>	method for evaluating PCB data and potential risk for recontamination of the Willamette River.
Comment 7:	<i>Consider revising Figures 7-2a through 7-2k of the SCE Report to include all sample results and not just the minimum, maximum, and average. Understanding the number of samples collected, the sampling location, and distribution of concentrations allows for a complete evaluation of stormwater sampling data. Additionally, grouping data according to year and sampling program type (i.e., source control evaluation or 1200-z sampling) would be helpful for providing context to sampling results.</i>	Figures will be updated <u>as requested</u> .
EPA Matters of Style Comments		Response
Comment 1:	<i>The detection limit should be presented in Figure 7-2c for cadmium, and values should be plotted on the rank order curves at the detection limit.</i>	The figure will be updated.