



December 21, 2021

Jim Orr, R.G.
Project Manager
Oregon DEQ
700 NE Multnomah St, Ste 600
Portland, Oregon 97232-4100

Subject: 2021 Remedial Investigation and Source Control Evaluation Reports
ECSI Site 138

Dear Mr. Orr,

Northwest Pipe Company (NWP) has addressed the DEQ and EPA's comments to our 2020 Remedial Investigation (RI) and Source Control Evaluation (SCE) Reports in the enclosed redline and clean versions of our 2021 Final RI/SCE Reports. We also have included a *Response To Comments* table for each report. This version specifically addresses the agency's comments, therefore new data collected since the 2020 version is not included.

These reports represent the culmination of more than 30 years of independent and voluntary site work with the Oregon Department of Environmental Quality (DEQ) and, more recently the EPA, to identify, investigate, and address sources of environmental constituents of interest.

Since NWP initiated its work with DEQ in the late 1980s, NWP has implemented extensive environmental improvements, including the removal of chemical storage tanks, soil remediation, soil excavation, installing more than 4 acres of asphalt cap, cleaning and coating more than 6 acres of roofing, and installing two state-of-the-art stormwater treatment filtration systems. During the time NWP has been working on the remedial investigation and source control evaluation, we have experienced protracted regulatory review periods, changes in regulatory team members, changes in regulator's findings regarding the Site, updates to guidance documents and data screening values, and an accumulation of additional sampling data. The impact of these changes has resulted in several versions of the Remedial Investigation/Source Control Evaluation (RI/SCE) Report (2005, 2014, 2015, and 2020).

The purpose of an RI Report is to analyze and present existing site information sufficiently to support decision-making with respect to the DEQ's Hazardous Substance Remedial Action rules. The purpose of an SCE Report is to identify, evaluate, and, if necessary, recommend control strategies for sources of contamination that may reach the Willamette River in concentrations that exceed Portland Harbor cleanup values.

Based on the findings of our RI, the SCE, and the results of significant environmental improvements, the NWP Site does not pose an unacceptable risk to human or ecological receptors as defined by OAR 340-122-0115 and does not pose recontamination risk to the Willamette River.



Consequently, NWP requests that DEQ issue a Site-wide No Further Action determination and a No Further Action Source Control Determination, consistent with the requirements contained in the Oregon Hazardous Substance Remedial Action Rules and associated statutes.

As requested, Northwest Pipe currently is developing a work plan for implementing a monitored natural attenuation (MNA) remedy for shallow groundwater containing volatile organic compounds (VOCs) in the Southeast Area of the site. The purpose of this work is to confirm that MNA is protective of human health and the environment, as well as being consistent with an NFA determination for both the RI and the SCE.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie Heldt-Sheller", written in a cursive style.

Stephanie Heldt-Sheller, CHMM
Northwest Pipe Company
Corporate Environmental Manager

cc:
Benjamin Leake, EPA Region X;
Ken Shump, R.G., Haute-Géologie LLC;
Kris Ivarson, PMP, Jacobs;
Claudia Powers, Buchalter LLP;
Mike Merchant, Black Helderline LLP;
Tim Whitson & Shane Zeeman, NWP Portland Plant
Aaron Wilkins, CFO, NWP Corporate