Draft Review Comments
Draft Source Control Evaluation for Stormwater, Groundwater, and Overwater Activities
Tube Forgings of America, Inc./Front Avenue LLCs
Portland, Oregon
Dated December 4, 2025
Comments dated January 20, 2026

The following are the U.S. Environmental Protection Agency's (EPA's) draft comments on the document titled Draft Source Control Evaluation for Stormwater, Groundwater, and Overwater Activities (Draft SCE). The Draft SCE was prepared by Bridgewater Group for Tube Forgings of America, Inc. (TFA) and Front Avenue LLCs. The Draft SCE focuses on the direct discharge stormwater pathway for TFA (located at 5200 NW Front Avenue in Portland, Oregon), and focuses on the groundwater, riverbank erosion and overwater activities pathways at and adjacent to the 4950 and 5034 NW Front Avenue parcels (collectively the "site"). The site is listed as Environmental Cleanup Site Information (ECSI) #1239 and is located along the Willamette River upland of the River Mile 9 West (RM9W) remedial design project area within the Portland Harbor Superfund Site (PHSS).

EPA's comments are categorized as "Primary," which identify concerns that must be resolved to achieve the objective; and "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the objectives.

Primary Comments

1. **Rank Order Curves**: EPA has the following comments on these figures.

    a. PCBs and arsenic are stormwater contaminants of concern (COCs), so stormwater rank order curves should be included for PCBs and arsenic.

    b. A rank-order curve for PCB concentrations in stormwater solids should be included. Table 3 indicates that PCBs (i.e., Aroclor 1254) were detected in the sample collected from the stormwater line between manhole C-5 and outfall WR-7 at a concentration of 89.2 µg/kg which exceeds the PHSS Record of Decision (ROD) sediment remedial action level (75 µg/kg). Non-detect samples should also be plotted on the PCB rank-order curve at the method reporting limit.

2. **Section 4.3 Contaminants of Potential Concern:** An explanation should be provided for excluding dioxins/furans as a site-specific COC for stormwater or samples should be collected to evaluate dioxins/furans in stormwater. Dioxins/furans have been identified as COCs that pose recontamination risk to RM9W sediment management areas. Additionally, dioxins/furans were identified as contaminants of interest in stormwater at the site in the Updated Sufficiency Assessment Report (Foth, 2023).

To Be Considered Comments

1. **Mobilization:** For a more robust discussion, EPA suggests adding an acknowledgement that arsenic and manganese in soil may be mobilizing in groundwater as a result of a change in oxidation/reduction chemistry that occurs due to the natural biodegradation of petroleum hydrocarbons and other organic contaminants.

References

Foth. 2023. *Updated Sufficiency Assessment Report. River Mile 9 West.* Portland, Oregon.