



May 28, 2026

Project No. M8128.02.031

Wesley Thomas
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR, 97232

Bob Wyatt
NW Natural
Portland, OR

Re: Siltronic Corporation Comments in Response to NWN's Doane Creek Source Control Evaluation

Dear Wes Thomas and Bob Wyatt:

On behalf of Siltronic Corporation (Siltronic), Maul Foster & Alongi, Inc. (MFA) has prepared this letter providing comments on NW Natural's (NWN's) February 27, 2026, *Doane Creek Source Control Evaluation Report* (the Doane Creek SCE Report) prepared by Anchor QEA and Ede Environmental, LLC, on behalf of NWN, and submitted by NWN to the Oregon Department of Environmental Quality (DEQ) under DEQ voluntary agreement No. WMCVM-NWN-94-13.

Siltronic is in general agreement with the conclusions of the Doane Creek SCE Report. Siltronic believes the groundwater data and associated data evaluations presented are largely consistent with Siltronic's conclusions presented in the *Siltronic Operable Unit Groundwater Source Control Evaluation Report* (SOU Groundwater SCE Report; MFA 2025a). The Doane Creek SCE Report identified manganese, polycyclic aromatic hydrocarbons (PAHs), and total DDx as contaminants of concern (COCs) where groundwater discharge may contribute to Outfall 22C discharge concentrations. PAHs, manganese, and DDx are present in groundwater adjacent to Doane Creek, however, Siltronic notes that the overall concentrations of these compounds in groundwater are substantially lower than concentrations observed in stormwater flows. Therefore, it appears that groundwater is not the sole or primary source of these COCs to Doane Creek or Outfall 22C.

In addition to the above note, Siltronic is providing the following comments to correct or clarify descriptions and characterizations of Siltronic's property and its history.

Attribution of PCP to Siltronic

In Section 4.10, describing Siltronic's operations near Doane Creek, NWN presents a list of substances supposedly released at the Siltronic property, including the chemical pentachlorophenol (PCP). Siltronic does not currently use, and has not historically used, PCP in its operations. As such, Siltronic's operations are not the source of PCP infrequently detected in soil and groundwater on the Siltronic property.

To support the attribution of a release of PCP to Siltronic, the SCE Report references the *Supplement to DEQ's Strategy Recommendation for the Wacker Siltronic Facility* report prepared by Bridgewater Group Inc. in March 2000, and appears to base the claim on two detections of PCP in Siltronic's combined effluent in 1988. However, these two detections of PCP in the combined effluent were anomalous detections which were followed by four months of sampling in which no PCP was detected. There are also abundant National Pollutant Discharge Elimination System (NPDES) data from both before and after the 1988 anomalous PCP detection that show total toxic organics (which included PCP) are not detected in Siltronic wastewater or are well below permit benchmarks.

Additionally, there is no plausible pathway for any COCs to migrate from Siltronic's combined effluent to surface water, soil, or groundwater in or near Doane Creek.

This is supported by the infrequent and scattered nature of PCP detected in soil and groundwater on the Siltronic property. PCP was detected in two soil samples in 1985, and has not been detected in any of the hundreds of subsequent soil, stormwater, or dense non-aqueous phase liquid (DNAPL) samples collected from Siltronic's property since that time (CH2M Hill 1985, MFA 2024, Hahn 2011). PCP detections in groundwater are exceedingly rare (only 18 detections in the 469 samples analyzed for PCP between 1990 and 2019), with the majority of detections being from the lower alluvium, alluvial gravel, and basalt water-bearing zones, which are dominated by trespass contaminant plumes and do not discharge to Doane Creek or Outfall 22C. The few fill water-bearing zone wells with PCP detections are all located in undeveloped areas on the periphery of the property, and none of these wells have had more than one detection of PCP. If a release of PCP had hypothetically occurred from Siltronic's operations, one would expect PCP to be consistently detected in the wells present in Siltronic's operational areas.

Siltronic reiterates that PCP is not currently or historically used in its operations. There are no documented releases of PCP from Siltronic's operations, a fact supported by over 35 years of analytical results. The PCP detections in outfall 22C discharges are not related to Siltronic's operations.

Chromic Acid and Nitric Acid

The report also includes chromic acid and nitric acid in the list presented in Section 4.10 for substances released at Siltronic's property, again referencing the 2000 Bridgewater Group report. The 2000 Bridgewater Group report does describe a leak of chromic and nitric acid that occurred in 1981 which entered a floor drain and sump within the facility. However, as the Bridgewater Group report notes, a transfer pump drained that sump to a storage tank fitted with secondary containment. The leak was discovered and the flow was stopped before any material could leave secondary containment. All of the leaked acid and rinse water solution was treated and disposed at an offsite hazardous waste landfill. No chromic or nitric acid was released to the environment as a result of this leak. Moreover, this leak was downgradient and approximately 1000 feet away from Doane Creek. Therefore, it is unclear why these chemicals are mentioned in the Doane Creek SCE report.

Siltronic Did Not Fill the Property

In Section 4.5, describing historical fill deposits, the report describes the fill placement as occurring during Siltronic property development activities, and states:

“Aerial photographs taken during the era of Siltronic filling (post-dating PG&C ownership or control) show some portions of the Siltronic property covered by a dark fill material.”

These descriptions suggest that Siltronic placed fill materials as part of their development of the property, which is not accurate. As described below, the property was filled by other parties in the decades before Siltronic purchased the property from the Portland Development Commission in 1978.

Dark Fill Material Consists of MGP Residuals

What the SCE Report labels as the placement of dark fill material in Section 4.5 and Figure 4.1 has long been established to be the redistribution of the spent oxide, tar, and other MGP waste residuals

that remained in the piles, effluent ponds, and bermed lowland on the Allen Tract when the property was sold in 1960 (HAI 2011, MFA 2024). As stated in Siltronic's comments on NWN's Gasco Operable Unit Feasibility Study report (MFA 2025b), vertical and oblique aerial images from February, August, and October 1966 show the site immediately before, during, and after the redistribution of the materials from the effluent ponds, bermed lowland, and spent oxide pile.

Siltronic's Operations Near Doane Creek are Limited

Section 4.10 of the Doane Creek SCE Report discusses Siltronic operations near Doane Creek as potential sources of contamination. Siltronic's operations near Doane Creek are limited, consisting solely of the wastewater treatment plant and bulk hydrogen storage. The wastewater treatment plant is located over 200 feet away from Doane Creek on an impermeable surface with stormwater managed by Outfall 001. No stormwater from this area is directed toward Doane Creek. Siltronic's bulk hydrogen storage, which is stored as compressed gas, is located approximately 150 feet from Doane Creek on a permeable gravel surface where infiltration is allowed to occur. Hydrogen is not a relevant chemical to source control for Portland Harbor.

Overland Flow to Doane Creek

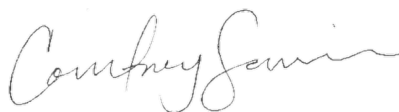
Section 4.10 also incorrectly states that an area of overland flow was historically a complete pathway from the Siltronic property to Doane Creek. This appears to be a misinterpretation of information provided in the 2020 *Revised Siltronic Stormwater Source Control Evaluation Report* (Siltronic Stormwater SCE) (MFA 2020). The Siltronic Stormwater SCE identifies two areas of overland flow in the vicinity of Doane Creek. One of these areas does not flow to Doane Creek and the other is not located on the Siltronic property. No complete overland flow pathway is currently, or was historically, present from the Siltronic property to Doane Creek.

The Administration Building is Not Industrial

In Section 2.3.3 and Table 2-1, the report describes the Administration Building Subbasin as an industrial use area. No industrial activities occur, or have ever occurred, at the Administration Building or its adjacent parking lot, and no industrial stormwater is generated from this area. No industrial water is discharged to Doane Creek from anywhere on the Siltronic property.

Closing

We appreciate the opportunity to comment on this document. Please contact us should you have any questions.



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Attachments

References
Limitations

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References

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- CH2M Hill Northwest Inc (CH2M Hill). 1985. Soil Investigation for Proposed Polysilicon Plant. Prepared for Wacker Siltronic Corporation. June.
- Ellis, James. Wacker Siltronic Corporation. 1985. "Proposed Polysilicon Site – Groundwater Analyses" Letter to Larry Patterson, Oregon Department of Environmental Quality. October 10.
- Hahn and Associates, Inc (Hahn). 2011. Remedial Investigation Data Summary Report, Historical Manufactured Gas Plant Activities, Siltronic Corporation Property. Prepared for NW Natural. March 31.
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- MFA. 2025a. *Revised Siltronic Operable Unit Groundwater Source Control Evaluation Report*. Prepared for Siltronic Corporation. November 25.
- MFA. 2025b. "Re: Siltronic Corporation Comments in Response to NWN's GOU Feasibility Study." Letter to Wesley Thomas, Oregon Department of Environmental Quality, and Bob Wyatt, NW Natural. March 14.

Limitations

The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the use of segregated portions of this report.



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