

MEMORANDUM | June 16, 2026

TO David Lacey and Jim Orr, Oregon Department of Environmental Quality (DEQ)

FROM Peter Shanahan, HydroAnalysis LLC (HALLC); Jennifer Hart and Gail Fricano, Industrial Economics, Inc. (IEc)

SUBJECT Five Tribe review of the “Proposed Source Control Decision” for the Northwest Pipe upland site, dated May 11, 2026

This memorandum, submitted on behalf of the Five Tribes,¹ reviews the *Proposed Source Control Decision* (SCD) for the Northwest Pipe upland site prepared by DEQ (DEQ 2026).

General Comments

1. We concur with DEQ’s conclusion that “the groundwater transport pathway, while potentially complete, does not currently contribute contaminants at concentrations above Portland Harbor Cleanup Levels” (CULs), and we agree with DEQ’s recommendation to complete the ongoing monitored natural attenuation (MNA) evaluation. However, we recommend the decision regarding groundwater be issued conditionally, or as an interim decision, pending the results of future monitoring.
2. The Proposed SCD does not fully support the conclusion that “stormwater is unlikely to have an adverse effect on water or sediment quality.” Nickel was found at elevated concentrations relative to DEQ’s stormwater guidelines (DEQ 2010), but these results are not discussed in the SCD. We recommend that the SCD identify these relatively high concentrations and explain why they do not pose a risk of recontamination to the Willamette River.
3. Certain sections of the Proposed SCD are extremely brief. For example, Section 2.3, *Potential Sources of Contamination*, describes past industrial use in one sentence and refers to the Source Control Evaluation (SCE) for a detailed summary. While referring to the SCE for additional details is reasonable, including a more complete summary of that information would allow the SCD to better serve as a standalone document.

Specific Comments

4. Section 2.3, *Contaminants of Interest*, lists the contaminants of interest (COIs) but omits volatile organic compounds (VOCs), which are listed as a COI in the SCE (Jacobs 2021).

¹ The five tribes are the Confederated Tribes of the Grand Ronde Community of Oregon, the Nez Perce Tribe, the Confederated Tribes of Siletz Indians, the Confederated Tribes of the Umatilla Indian Reservation, and the Confederated Tribes of the Warm Springs Reservation of Oregon.

Tetrachloroethylene (PCE) is found in high concentrations in groundwater; thus, we recommend that VOCs be included as a COI in the SCD.

5. The list of COIs in Section 2.3 includes tributyl tin, but the SCE (Jacobs 2021) specifically excludes tributyl tin and discusses the reasons for excluding it. We recommend the SCD address this difference of opinion.
6. We recommend that Section 3.0, *Regulatory History*, also mention the combined Remedial Investigation and SCE report that was prepared in 2020 (Jacobs 2020).
7. Section 5.1, *Stormwater SCE*, indicates that ethylbenzene was not analyzed in stormwater; however, it was sampled in roof runoff along with other VOCs as shown in Table 5-3 of the SCE (Jacobs 2021).
8. Section 5.1 states "...contaminants...are now either below detection limits or at or below the knee of the stormwater curves developed by DEQ." Figure 7-2g of the SCE shows concentrations of nickel measured well above the knee of the curve (Jacobs 2021). We recommend these higher values be discussed in the text, particularly in the Stormwater Pathway Line of Evidence #2.
9. Section 5.1, Stormwater Pathway Line of Evidence #5, states "Annual runoff volumes of this size site discharged to the Willamette River are estimated to be on the high end in comparison to other industrialized sites discharging to Portland Harbor." We recommend the SCD be revised to provide additional explanation and justification. It is unclear how DEQ made this comparison and what the average discharge is based on.
10. Section 5.2, *Groundwater SCE*, indicates that concentrations of benzene have exceeded CULs in some wells; however, no data for benzene is presented, and benzene is not discussed further in the SCD. We recommend revising the SCD to provide a more complete evaluation and discussion of benzene as a potential COI in groundwater.
11. Section 5.2, Groundwater Pathway Line of Evidence #2, appears to be missing some words but implies that no "...contaminant concentrations suggestive of separate-phase contamination" have been observed. As discussed in the Five Tribes' comments (Shanahan 2020) on the original SCE (Jacobs 2020), we disagree with the statement that there has been no indication of dense nonaqueous phase liquids (DNAPLs) on the site. In our memorandum we stated "Concentrations of PCE are high enough in groundwater in the Southeast Area to indicate the likely presence of DNAPL PCE in the subsurface according to a criterion given in EPA guidance (Newell and Ross, 1992) that concentrations greater than 1% of pure phase solubility indicate the likely presence of DNAPL. The pure-phase solubility of PCE is about 200,000 µg/L (Pankow and Cherry, 1996). Figure 5-9a shows numerous results in which PCE exceeds 1% of this value (2,000 µg/L) in monitoring well MW-05, providing strong evidence that DNAPL is present near this well." We recommend the SCD be revised to include further consideration of DNAPL presence in site groundwater.
12. Section 5.2, Groundwater Pathway Line of Evidence #5, states "Regional background concentrations have not been determined for groundwater constituents." However, there is an established background concentration for arsenic, which is identified in Groundwater Pathway Line of Evidence #1 as a constituent of potential concern (COPC). Background concentrations do not exist for the chlorinated VOCs identified in the southeast part of the site, but we disagree that

those concentrations are “predominantly similar to those observed at other sites in the area.” Our review of groundwater sample results for Lampros Steel (EVREN 2026) and Burgard Industrial Park (Floyd | Snider 2021) shows concentrations well below those observed at Northwest Pipe. For example, the highest concentration for PCE in the Burgard Industrial Park was 23 µg/L (Floyd | Snider 2021, Table 10.2), compared to a historical high concentration of 4,400 µg/L at Northwest Pipe (Jacobs 2020, Table 6-1). Thus, we recommend that this conclusion be struck from the SCD.

13. Section 5.2, Groundwater Pathway Line of Evidence #7, states that there is “limited extent of elevated contaminants observed in site groundwater.” It is unclear if this refers to areal extent, which is small, or the concentrations observed, which are high at the source area. We recommend this phrase be struck. This Line of Evidence also cites “...anticipated natural attenuation...” We recommend this be rephrased as “...observed natural attenuation...”
14. Section 6.0, *Source Control Decision*, refers to “...implementation of Monitored Natural Attenuation (MNA) analysis...” We recommend this be rephrased as “Monitored Natural Attenuation (MNA) evaluation” to be consistent with the MNA Work Plan currently being executed at the site (Jacobs 2025).

Editorial Comments

15. We identified several typographical errors throughout the SCD and recommend conducting a close editorial review and applying corrections for clarity. For example:
 - i. Section 2.1 indicates the site is 29 acres whereas Section 5.1 indicates it is 26 acres. We recommend this discrepancy be resolved.
 - ii. There are two sections numbered 2.3.
 - iii. The acronyms MCPA and COPC are not defined.
 - iv. In Section 4.2, we believe the reference to “tetrachloroethane” should be corrected to refer to “tetrachloroethylene.”
 - v. In Section 5.1, “aldrin” is misspelled “aldren.”
 - vi. In Section 5.2, MNA is defined as “Monitored Natural Attention” instead of “Monitored Natural Attenuation.”
 - vii. Outfall 18 is identified as “Outfall-18/WR-124” in a few instances and as “Outfall-18/WR-123” in others. Assuming this is the same outfall, we recommend standardizing the reference throughout the SCD.
16. Section 2.4 indicates under “Overwater Activities” and “Riverbank Erosion Pathway” that the facility is not adjacent to the river. Since the facility is quite close to the river, we recommend revising this text to say, “the facility is not directly adjacent to the river.”

References

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