May 13, 2020

Ms. Cindy Ryals
Technical Program Manager, Portland Harbor Superfund
City of Portland Bureau of Environmental Services
1120 SW Fifth Avenue, Suite 613
Portland, Oregon 97204

RE: DEQ Comments on Technical Memorandum - Evaluation of dioxin data in Portland Harbor surface sediment in support of City of Portland Outfalls Source Control Decision

Dear Cindy:

Thank you for submittal of the Technical Memorandum - Evaluation of dioxin data in Portland Harbor surface sediment in support of City of Portland Outfalls Source Control Decision, dated April 21, 2020. DEQ considered the information provided in the memorandum during preparation of DEQ’s Proposed Portland Harbor Source Control Decision for the City of Portland Outfalls Project, which was published for public comment on April 30, 2020. Due to the timing of decision making currently underway, DEQ is not requiring revisions to the memorandum. However, DEQ offers the following comments, which may improve the memorandum’s presentation. DEQ will accept a final version of the memorandum that incorporates the following comments, should the City decide to revise the memorandum for the final file record.

DEQ comments on the memorandum:
1. DEQ generally agrees with the evaluation methodology and conclusions drawn in the memorandum. However, the conclusion that “City outfalls are not a significant source of dioxins/furans to the Portland Harbor” somewhat overstates the results of the evaluation. While DEQ generally agrees with this statement, the evaluation was limited to data available near seven of 35 active City outfalls. As discussed in DEQ’s proposed decision, DEQ identified three additional sediment areas near City outfalls discharge locations with available data showing elevated concentrations of one or more dioxins/furans congeners that have EPA established remedial action levels. DEQ agrees that the City outfalls evaluated are representative of other City outfall discharges and that the overall potential is low for on-going City outfall discharges to contribute significant loads (volumes, concentrations and sediment association) of dioxins/furans to Portland Harbor. However, given the noted lack of dioxins/furans data in stormwater discharges throughout Portland Harbor, a more accurate conclusion is that discharges from the outfalls evaluated are not a significant source of dioxins/furans to the areas in which they are located.

2. The memorandum could be improved with inclusion of figures showing each outfall, location and value of the sample closest to each outfall and locations and values of samples used in the maximum and average calculations.

3. The memorandum could be improved by providing a column in Table 1 that indicates the distance and direction (at a minimum upriver or downriver) from each outfall of the samples chosen as closest to each outfall.
Thank you for considering these comments. DEQ commends the City on the extensive stormwater source control evaluation work performed over the past 20 years and looks forward to completion of the proposed source control decision, as well as future coordination with the City on continued implementation of the Portland Harbor stormwater strategy. As always, please contact me for any needed clarifications on this letter or any stormwater source control process questions.

Sincerely,

L. Alexandra Liverman

c:  Paul Seidel, DEQ
    Ben Leake, EPA

c:  ECSI # 2425