UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OREGON OPERATIONS OFFICE
805 SW Broadway, Suite 500
Portland, Oregon 97205

December 23, 2009

Mr. Robert Wyatt
Northwest Natural & Chairman, Lower Willamette Group
220 Northwest Second Avenue
Portland, Oregon 97209

Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240 – Archived Sediment Samples for PBDE Analysis

Dear Mr. Wyatt:

On January 22, 2009, the Lower Willamette Group (LWG) requested permission to dispose of archived Round 1 and Round 2 samples collected during the Portland Harbor remedial investigation (RI). On May 14, 2009, EPA requested that the LWG retain these samples until EPA was in receipt of the analytical results from the polybrominated diphenyl ether (PBDE) analysis of Round 3 tissue samples performed by EPA's regional laboratory. EPA further stated that once the PBDE tissue results had been received and evaluated, EPA would determine which sediment samples, if any, should be retained for PBDE or any other analysis and which sediment samples may be disposed of.

EPA received the PBDE results on November 12, 2009 and transmitted the data to the LWG on November 12, 2009. Preliminary review of the PBDE analysis of the samples indicates that whole body bass tissue and whole body and fillet carp tissue contain concentrations of PBDEs that present a risk to human health if consumed. Based on a fish consumption rate of 175 g/day, hazard quotients for whole body bass and whole body and fillet carp range from 0.55 to 2.7 with the majority of samples exceeding a hazard quotient of one.

Based on these results, EPA is requesting that 97 surface sediment samples be shipped to the EPA Region 10 Manchester Environmental Laboratory for PBDE analysis. A list of samples is included in the attached Table 1. The majority of the samples were collected during Round 3. However, 32 Round 2 samples have been identified. The LWG should make arrangements using the procedures, including chain-of-custody, that were followed for the prior shipment of the archived tissue samples.

Once specified Round 2 samples have been transmitted to our laboratory, the remaining Round 1 and Round 2 samples (with the exception of the archived tissue samples requested by the Natural Resource Trustees) may be disposed of. EPA understands that all archived Round 3 samples will be retained until the draft RI and baseline risk assessment reports have been reviewed by EPA.

Thank you for your cooperation in this matter. If you have any questions or need more information to coordinate the sample shipment, please contact Chip Humphrey at (503) 326-2678 or Eric Blischke (503) 326-4006. All legal inquiries should be directed to Lori Cora at (206) 553-1115.

Sincerely,

Chip Humphrey
Eric Blischke
Remedial Project Managers

cc: Greg Ulirsch, ATSDR
Rob Neely, NOAA
Ted Buerger, US Fish and Wildlife Service
Preston Sleeger, Department of Interior
Jim Anderson, DEQ
Kurt Burkholder, Oregon DOJ
David Farrer, Oregon Environmental Health Assessment Program
Rick Keppler, Oregon Department of Fish and Wildlife
Michael Karnosh, Confederated Tribes of Grand Ronde
Tom Downey, Confederated Tribes of Siletz
Audie Huber, Confederated Tribes of Umatilla
Brian Cunninghame, Confederated Tribes of Warm Springs
Erin Madden, Nez Perce Tribe
Rose Longoria, Confederated Tribes of Yakama Nation

Table 1
Archived Sediment Samples for PBDE Analysis

Study Name	Station ID	River Mile	Latitude	Longitude
Round 3 2006 - Up/downstream sediment	DG01	1	45.63411	-122.78553
Round 3 2006 - Up/downstream sediment	DG04	1	45.63795	-122.7868
Round 3 2006 - Up/downstream sediment	DG07	1	45.63779	-122.78067
Round 3 2006 - Up/downstream sediment	DG09	1	45.64034	-122.78227
Round 3 2006 - Up/downstream sediment	DG10	1	45.63982	-122.77641
Round 3 2006 - Up/downstream sediment	DG17	1	45.64257	-122.77745
Round 2A 2004 - Portland Harbor	G003	2	45.633205	-122.79219
Round 2A 2004 - Portland Harbor	G023-1	2	45.628643	-122.79418
Round 2A 2004 - Portland Harbor	G045	2	45.619863	-122.79527
Round 3 2007 - PH Sediment Grabs	G601	2	45.63265	-122.78949
Round 3 2007 - PH Sediment Grabs	G602	2	45.63108	-122.78642
Round 3 2007 - PH Sediment Grabs	G605	2	45.62778	-122.78797
Round 3 2007 - PH Sediment Grabs	G606	2	45.62637	-122.79111
Round 3 2007 - PH Sediment Grabs	G609	2	45.62328	-122.78829
Round 2A 2004 - Portland Harbor	G046	3	45.61985	-122.78791
Round 2A 2004 - Portland Harbor	G066	3	45.613368	-122.79162
Round 2A 2004 - Portland Harbor	G085	3	45.611138	-122.77546
Round 2A 2004 - Portland Harbor	G087	3	45.611003	-122.78025
Round 3 2007 - PH Toxicity Study	G6122	3	45.61611	-122.78722
Round 3 2007 - PH Sediment Grabs	G617	3	45.61031	-122.78593
Round 3 2007 - PH Sediment Grabs	G618	3	45.60916	-122.7835
Round 3 2007 - PH Sediment Grabs	G619	3	45.60737	-122.78796
Round 3 2007 - PH Toxicity Study	G6841	3	45.57434	-122.73823
Round 3 2007 - PH Sediment Grabs	G784	3	45.61133	-122.7841
Round 2A 2004 - Portland Harbor	G056	3	45.616862	-122.78983
Round 2A 2004 - Portland Harbor	G160	4	45.594627	-122.7786
Round 2A 2004 - Portland Harbor	G106	4	45.608318	-122.78153
Round 3 2007 - PH Sediment Grabs	G621	4	45.60604	-122.78396
Round 3 2007 - PH Toxicity Study	G622	4	45.60588	-122.78618
Round 3 2007 - PH Sediment Grabs	G624	4	45.60346	-122.78007
Round 3 2007 - PH Sediment Grabs	G626	4	45.60073	-122.78371
Round 3 2007 - PH Sediment Grabs	G631	4	45.59959	-122.77725
Round 3 2007 - PH Sediment Grabs	G634	4	45.59681	-122.77444
Round 3 2007 - PH Sediment Grabs	G635	4	45.59511	-122.77508
Round 3 2007 - PH Sediment Grabs	G630	4	45.60055	-122.77936
Round 2A 2004 - Portland Harbor	G183	5	45.591353	-122.77201
Round 2A 2004 - Portland Harbor	G204	5	45.588202	-122.76537
Round 3 2007 - PH Sediment Grabs	G636	5	45.59183	-122.77045
Round 3 2007 - PH Sediment Grabs	G6411	5	45.58732	-122.76898
Round 3 2007 - PH Sediment Grabs	G642	5	45.58816	-122.76726
Round 3 2007 - PH Sediment Grabs	G650	5	45.58419	-122.76265
Round 3 2007 - PH Sediment Grabs	G651	5	45.5855	-122.76176
Round 3 2007 - PH Toxicity Study	G653	5	45.58273	-122.76458
Round 2A 2004 - Portland Harbor	G182	5	45.59147	-122.77525
Round 2A 2004 - Portland Harbor	G273	6	45.58064	-122.75957
Round 2A 2004 - Portland Harbor	G295	6	45.579828	-122.74601
Round 2A 2004 - Portland Harbor	G308	6	45.578755	-122.75483
Round 2A 2004 - Portland Harbor	G331	6	45.575895	-122.74904
Round 3 2007 - PH Sediment Grabs	G655	6	45.58263	-122.76227
Round 3 2007 - PH Sediment Grabs	G660	6	45.58244	-122.75648
Round 3 2007 - PH Toxicity Study	G663	6	45.58089	-122.752

Table 1
Archived Sediment Samples for PBDE Analysis

Study Name	Station ID	River Mile	Latitude	Longitude
Round 3 2007 - PH Sediment Grabs	G669	6	45.57718	-122.74631
Round 2A 2004 - Portland Harbor	G378	7	45.568108	-122.7345
Round 3 2007 - PH Sediment Grabs	G673	7	45.57476	-122.74481
Round 3 2007 - PH Sediment Grabs	G676	7	45.5756	-122.74222
Round 3 2007 - PH Sediment Grabs	G686	7	45.57395	-122.73712
Round 3 2007 - PH Sediment Grabs	G691	7	45.57132	-122.73447
Round 3 2007 - PH Sediment Grabs	G6922	7	45.56779	-122.73918
Round 3 2007 - PH Toxicity Study	G694	7	45.56584	-122.73672
Round 3 2007 - PH Sediment Grabs	G696	7	45.56921	-122.72724
Round 2A 2004 - Portland Harbor	G350	7	45.572813	-122.74419
Round 2A 2004 - Portland Harbor	G420	8	45.562955	-122.72134
Round 2A 2004 - Portland Harbor	G431	8	45.5603664	-122.72911
Round 2A 2004 - Portland Harbor	G435	8	45.559337	-122.72206
Round 2A 2004 - Portland Harbor	G457	8	45.555843	-122.71841
Round 3 2007 - PH Sediment Grabs	G699	8	45.56421	-122.7315
Round 3 2007 - PH Sediment Grabs	G705	8	45.56545	-122.72752
Round 3 2007 - PH Sediment Grabs	G715	8	45.56089	-122.72383
Round 3 2007 - PH Sediment Grabs	G729	8	45.55663	-122.71613
Round 3 2007 - PH Sediment Grabs	G731	9	45.55738	-122.71092
Round 3 2007 - PH Sediment Grabs	G7322	9	45.555	-122.71329
Round 3 2007 - PH Sediment Grabs	G734	9	45.55333	-122.70772
Round 3 2007 - PH Sediment Grabs	G735	9	45.55249	-122.70886
Round 3 2007 - PH Toxicity Study	G740	9	45.54987	-122.70481
Round 3 2007 - PH Sediment Grabs	G742	9	45.55253	-122.69745
Round 3 2007 - PH Toxicity Study	G746	10	45.55038	-122.69499
Round 3 2007 - PH Sediment Grabs	G748	10	45.54754	-122.69738
Round 3 2007 - PH Sediment Grabs	G753	10	45.54478	-122.69337
Round 3 2007 - PH Sediment Grabs	G758	10	45.54455	-122.68953
Round 3 2007 - PH Sediment Grabs	G760	10	45.54377	-122.6904
Round 3 2007 - PH Sediment Grabs	G770	10	45.54049	-122.68754
Round 3 2007 - PH Sediment Grabs	G771	10	45.54021	-122.68413
Round 3 2007 - PH Toxicity Study	G772	11	45.53688	-122.68393
Round 3 2007 - PH Sediment Grabs	G783	11	45.52491	-122.6693
Round 3 2007 - PH Colocated Sed	GCRSP11E	11	45.5365	-122.67693
Round 3 2007 - PH Colocated Sed	GCRSP12E	11	45.52696	-122.66624
Round 3 2007 - PH Colocated Sed	GSP12WA	11	45.52859	-122.67152
Round 3 2006 - Up/downstream sediment	UG01	11	45.53783	-122.67973
Round 2A 2004 - Portland Harbor	G367	Swan Island	45.57041	-122.72299
Round 2A 2004 - Portland Harbor	G376	Swan Island	45.568428	-122.72417
Round 2A 2004 - Portland Harbor	G380	Swan Island	45.568332	-122.71701
Round 2A 2004 - Portland Harbor	G392	Swan Island	45.566497	-122.72507
Round 2A 2004 - Portland Harbor	G397	Swan Island	45.56615	-122.71476
Round 2A 2004 - Portland Harbor	G408	Swan Island	45.564913	-122.71424
Round 2A 2004 - Portland Harbor	G411	Swan Island	45.5648667	-122.71003
Round 2A 2004 - Portland Harbor	G425	Swan Island	45.562672	-122.7067
Round 2A 2004 - Portland Harbor	G426	Swan Island	45.562293	-122.70964