LWG
LOWER WILLAMETTE GROUP

March 28, 2008

Chip Humphrey
Eric Blischke
U.S. Environmental Protection Agency, Region 10
805 SW Broadway, Suite 500
Portland, OR 97205

Re: Archived PCB Congener Samples

Dear Mssrs. Humphrey and Blischke:

This letter is provided to notify EPA of LWG's intention to analyze additional Round 2 archived samples for PCB congeners. LWG has evaluated the Round 3B sample locations selected for PCB congener analysis and previous PCB data for Portland Harbor and has identified additional locations where data are needed to allow a more detailed evaluation of PCBs. Sample locations were selected near Evraz Oregon Steel, in Willamette Cove, in Swan Island Lagoon, and along the east bank between about RM 9.6 and RM 10.6 near Union Pacific Railroad's Albina Yard. The additional PCB congener data will be used to refine the evaluation of the nature and extent of PCBs, to help differentiate between current and historical sources that impact the vertical and lateral distribution of PCBs in these areas, and to evaluate transport and recontamination potential. Three of the samples are being reanalyzed for PCB congeners to confirm total PCB concentrations at locations where discrepancies were found between Aroclor and PCB congener totals.

LWG has submitted a total of 53 samples to Vista Analytical Laboratory for analysis of PCB congeners in accordance with *Portland Harbor RI/FS Round 2 Quality Assurance Project Plan Addendum 10: Sediment Sampling for Round 3B* (document number IC07-0033, Integral 2007). Samples to be analyzed for PCB congeners and their Aroclor concentrations are shown in Table 1. Most of these samples were collected between July and November 2004 and three were collected in late 2005. The samples have been archived for up to about 3½ years, well beyond the 1-year holding time established by PSEP (Puget Sound Estuary Program) guidelines and cited in the QAPP for frozen sediment samples. Because these samples were stored frozen and PCBs are not expected to degrade significantly under the given archive conditions and holding time, the PCB concentrations currently present in the samples are expected to be representative of PCB concentrations present at the time of sample collection. The data will be qualified as estimated during data validation because the holding time was exceeded, but we consider the data usable for the purposes of the Portland Harbor RI/FS.

Please contact me or Maja Tritt if you have any questions.

Sincerely,

Gene C. Revelas
RI Lead Consultant

cc: Jim McKenna, Port of Portland, LWG Co-Chairman
Robert Wyatt, Northwest Natural, LWG Co-Chairman
Jim Anderson, ODEQ
Rick Applegate, City of Portland
David Ashton, Port of Portland, LWG Legal Committee
Kristine Koch, USEPA
Valerie Oster, LWG Repository Copy

Table 1. Archived Round 2 Sediment Samples Selected for PCB Congener Analysis.

Location	X	Y	Sample ID	Sample Date	Start Depth (cm)	End Depth (cm)	Total PCB Aroclors (ug/kg)	Total PCB Congeners (pg/g)
LW2-C015	7617377.66	724054.1	LW2-C015-B	9/24/2004	30	107	3130 JT	
LW2-C019	7617322.2	723903.08	LW2-C019-C1	9/24/2004	86	175	96.2 JT	
LW2-C019	7617322.2	723903.08	LW2-C019-D1	9/24/2004	175	264	470 JT	
LW2-C020	7617168.86	723654.52	LW2-C020-B	9/24/2004	30	102	820 JT	
LW2-C022	7616846	723625.36	LW2-C022-B	9/24/2004	30	152	24.6 JT	
LW2-C022	7616846	723625.36	LW2-C022-C	9/24/2004	152	277	44.2 JT	
LW2-C025	7617129.66	723354.7	LW2-C025-C1	9/24/2004	78	198	7170 JT	
LW2-C034	7616866.16	721897.63	LW2-C034-B	9/29/2004	30	75	30.6 JT	
LW2-C266	7625483.98	705968.9	LW2-C266-C	10/5/2004	131	276	79.5 JT	
LW2-C277	7626697.87	705747.24	LW2-C277-B	10/19/2004	30	152	210 JT	
LW2-C277	7626697.87	705747.24	LW2-C277-D	10/19/2004	273	341	345 JT	
LW2-C282	7627314.91	705615.18	LW2-C282-A	11/11/2004	0	30	5.4 JT	
LW2-C290	7626161.1	705526.92	LW2-C290-B	10/19/2004	30	92	9.9 T	
LW2-C291	7626800.19	705512.17	LW2-C291-A	10/19/2004	0	30	19 T	
LW2-C291	7626800.19	705512.17	LW2-C291-B	10/19/2004	30	152	36 T	
LW2-C291	7626800.19	705512.17	LW2-C291-C	10/19/2004	152	289	186 T	
LW2-C293	7626525.81	705500.96	LW2-C293-C	10/18/2004	151	272	344 JT	
LW2-C303	7627151	705315	LW2-C303-B	10/19/2005	30	86	163 T	
LW2-C384	7632708.33	700809.91	LW2-C384-B	10/7/2004	30	128	3840 JT	
LW2-C384	7632708.33	700809.91	LW2-C384-C	10/7/2004	128	207	60.1 JT	
LW2-C384	7632708.33	700809.91	LW2-C384-E	10/7/2004	274	334	2.2 UT	
LW2-C393	7634313.92	700440.54	LW2-C393-B	10/25/2004	30	152	1220 JT	
LW2-C425	7636990.13	698948.98	LW2-C425-B1	10/26/2004	30	165	64.6 JT	
LW2-C425	7636990.13	698948.98	LW2-C425-C1	10/26/2004	165	217	108 JT	
LW2-C425	7636990.13	698948.98	LW2-C425-E1	10/26/2004	257	295	172 JT	
LW2-C430	7636675.51	698546.02	LW2-C430-A	11/10/2004	0	30	133 T	
LW2-C430	7636675.51	698546.02	LW2-C430-B	11/10/2004	30	155	141 JT	
LW2-C430	7636675.51	698546.02	LW2-C430-C	11/10/2004	155	278	278 T	
LW2-C430	7636675.51	698546.02	LW2-C430-E	11/10/2004	400	520	547 JT	
LW2-C524	7627408	705645	LW2-C524-A	10/19/2005	0	30	22 T	
LW2-D1-2	7616174.066	725831.1786	LW2-D1-2	11/5/2004	0	29	9.83 JT	
LW2-G006	7617437.32	724760.67	LW2-G006	7/21/2004	0	29	11 JT	
LW2-G008	7616988.34	724494.33	LW2-G008	7/21/2004	0	29	9.1 JT	

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LW2-G022	7616843.68	723633.94	LW2-G022	7/23/2004	0	28	11.9 JT	
LW2-G030	7616745.17	722580.73	LW2-G030	7/23/2004	0	28	4.8 UJT	
LW2-G260	7625327.88	706172.66	LW2-G260	9/14/2004	0	20	7.75 JT	
LW2-G268	7625764.73	705963.51	LW2-G268	9/14/2004	0	26	112 JT	
LW2-G282	7627338.7	705703.28	LW2-G282	10/22/2004	0	23	3130 JT	1400000 T
LW2-G295	7627103.42	705486.1	LW2-G295	10/11/2004	0	25	110 JT	
LW2-G296	7627330.58	705457.29	LW2-G296	10/28/2004	0	27	145 JT	
LW2-G297	7624637.47	705449.65	LW2-G297	8/19/2004	0	27		
LW2-G303	7627152.5	705316.95	LW2-G303	10/29/2004	0	29	112 JT	
LW2-G306	7626149.4	705214.16	LW2-G306	8/23/2004	0	26	3.4 JT	
LW2-G313	7626338.55	704908.58	LW2-G313	8/20/2004	0	27	237 JT	
LW2-G393	7634311.44	700443.65	LW2-G393	10/22/2004	0	26	2310 T	
LW2-G425	7636994.58	698955.55	LW2-G425	10/7/2004	0	24	14.9 JT	
LW2-G481	7638611.24	695488.9	LW2-G481	9/2/2004	0	26	75.2 T	9620 T
LW2-G484	7638739.49	695211.24	LW2-G484	9/2/2004	0	27	95.8 JT	
LW2-G487	7639695.54	694888.57	LW2-G487	9/2/2004	0	21	46.1 JT	
LW2-G502	7640797.85	692950.41	LW2-G502	9/3/2004	0	20	34.6 JT	
LW2-G505	7641134.84	692492.64	LW2-G505	9/3/2004	0	22	45.5 JT	
LW2-G507	7641422.01	692150.51	LW2-G507	9/3/2004	0	20	7.56 JT	
LW2-GBT016	7627055.321	705663.129	LW2-GBT016	12/19/2005	0	10	850 T	8100000 T

Notes:

J - The associated numerical value is an estimated quantity.

T - The associated numerical value was mathematically derived (e.g., from summing multiple analyte results such as Aroclors).