



# Oregon

John A. Kitzhaber, M.D., Governor

## Department of Environmental Quality

May 24, 2000

Northwest Region  
2020 SW Fourth Avenue  
Suite 400  
Portland, OR 97201-4987  
(503) 229-5263 Voice  
TTY (503) 229-5471

George Scott  
Port City Development Center  
1847 East Burnside Street  
Portland, Oregon 97214

John W. Finklea  
3223 SW Naito Parkway  
Portland, Oregon 97201

Re: Port City Development  
A.k.a. Wagstaff Battery  
EC SI # 1243

Dear Mr. Finklea and Mr. Scott:

The Department of Environmental Quality (DEQ) has completed its review of development plans for the Port City Development Center to be located at 2124 N. Williams Avenue in Portland, Oregon. In conjunction with this review, we were also given a copy of the November 23, 1999 "Phase I Environmental Site Assessment" completed by PNG Environmental, Inc. This review was performed in accordance with the terms of the Prospective Purchaser Agreement (PPA) between DEQ and Port City Development. The PPA requires certain actions to be performed in order not to jeopardize the state's release from liability. A partial listing of the required actions are as follows:

- Port City Development shall place and maintain caps over Sump 1 and the former dry well location.
- Port City Development shall submit building plans for DEQ approval.
- Surface water shall be directed away from the former dry well.
- Contaminated soils may not be disturbed without prior written approval from DEQ, unless performed in accordance with a DEQ-approved work plan for this activity.
- After construction begins, Port City Development shall submit brief quarterly progress reports to DEQ.

The DEQ has completed its review of the "Phase I Environmental Site Assessment." New information was provided in the Phase I that was not included in DEQ's February 24, 1998 "no further action" determination. The DEQ recommends the following additional work be performed prior to construction:

- A. An additional sump (1A) or catch basin was discovered. A hazardous waste characterization should be performed on any sludge or residues that have accumulated in sump 1A. The characterization should include testing for lead (total and TCLP), pH, and total petroleum hydrocarbons. The sump contents should then be managed or disposed of in accordance with the results of the hazardous waste determination.

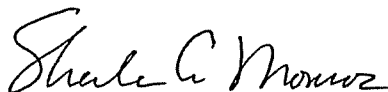
- B. After cleaning sump 1A of sludge, inspect for holes, cracks, corrosion points, etc., where fluids may have leaked from the sump to the subsurface. If the integrity of the sump has been compromised, then investigate for potential contaminants beneath the sump. DEQ would become more involved in a sampling plan (and removal action, if necessary) pending the results of the sump inspection.
- C. The Phase 1 also recommends sampling beneath the paved areas (pg. 27) and at a water valve opening. DEQ recommends having a contingency plan to address potentially contaminated soil. Testing the soils prior to demolition/construction is also an option. A contingency plan shall be required as part of the following development plan approval. Either pre-testing or the contingency plan should allow for construction to proceed in a timely fashion and for appropriate management of potentially contaminated soils.

The development plans are approved with the following requirements:

- 1. Perform field screening for potential contamination when previously, uninvestigated areas or suspect areas are uncovered.
- 2. Draft a contingency plan for encountering potentially contaminated soils. For example, designate a temporary storage location for suspect soils. This will allow construction to continue pending the results of analytical testing for potential contamination. Also, excavated soils should be tested prior to re-use or disposal because, although field screening will likely be effective in identifying petroleum contaminated soils, visual evidence (discoloration) may or may not be evident for lead-contaminated soils.
- 3. Submit your contingency plan to DEQ for comment.
- 4. Demolition debris (esp. wood, sheetrock, or other absorptive materials) may be coated with lead-containing dust and may require special handling and disposal. The demolition debris should be handled in accordance with the attached policy for "Management of Building Demolition Waste."

If you have additional questions or if I can be of assistance, please contact me at 229-5445. At your convenience, we would like to schedule a site inspection, probably concurrent with cleaning/inspecting sump 1A.

Sincerely,



Sheila A. Monroe

Project Manager

Voluntary Cleanup and Portland Harbor Section

Cc: Tom Roick, DEQ  
Tom Gainer, DEQ

Enclosure: Management of Building Demolition Waste Policy

State of Oregon  
Department of Environmental Quality

Memorandum

To: John W. Finklea  
George Scott

Date: July 11, 2000

From: Sheila Monroe */KM*

Subject: Proposals for environmental work in response to June 5 RFP

Task 1. Hazardous waste characterization and disposal of contents of Sump 1A.

We recommend cleaning out the sump, placing the sump contents into drums, performing the hazardous waste characterization and then, depending on the results, appropriate disposal. (PBS's proposal)

Task 2. Inspect the sump and collect soil samples, if necessary.

If there is the potential that the sump has leaked, we recommend collecting a soil sample from immediately beneath the potential leak location and attempting to define the vertical extent of contamination by auguring until the soils no longer appear to be impacted and collecting an additional soil sample. Based on our observations at the previous sump cleanup, we do not expect significant horizontal migration of contamination and would not initially recommend collecting samples to define the horizontal extent of contamination. Furthermore, if you intend to remove contaminated soils, then the post-excavation, confirmatory samples would define the extent of contamination. If you do not intend to remove contaminated soils, then the extent (both vertical and horizontal) of contamination must be defined before the DEQ could approve leaving the pocket of contamination.

Task 3. Cleanup of soil contamination beneath Sump 1A, if present.

If significant contamination is present, DEQ may request a workplan. If significant contamination is not present, we could informally discuss remedial options that are likely to consist of excavation and confirmatory testing. We would request a short summary report discussing the remedial work, conclusions, sample locations, and sample results. PNG's proposal to discuss options with DEQ is adequate.

Task 4. Develop a contingency plan to address potentially contaminated soil.

There are merits to collecting soil samples prior to construction. This would allow for better planning should contamination be detected and may facilitate your construction schedule. However, it is our experience that regardless of how many samples are collected, you will still need a contingency plan for suspect soils that may be encountered beneath covered areas. We recommend segregating pavement/concrete from soils and

designating an on-site area for temporary storage of suspect soils. We would not require testing or special handling of pavement/concrete. Subsequent testing of the soils would direct their reuse or disposal requirements. If significant contamination is suspected beneath the pavement/concrete, DEQ should be consulted. We would likely require some investigation of the nature and extent of contamination beneath these areas. We do recommend having an environmental professional participate in excavation of suspect areas in order to inspect for visible indications of contamination, screen suspect soils from non-suspect soils, and /or field screen for pH in soils.

Task 5. Management of demolition debris.

DEQ's intent was to insure that demolition debris is disposed of at a lined-landfill such as Hillsboro Landfill. Because sheetrock, plywood, or building materials in the battery manufacturing areas may have some lead dust adhering to them, we do not want this material to be reused or recycled. If the material is to be recycled, you must disclose that it may be contaminated with lead.

We do not anticipate that lead concentrations on building materials would be so high as to necessitate managing the demolition debris as hazardous waste. A sample collected (cored through the material rather than a surface scrape) from a heavily stained area should be analyzed (total lead and TCLP) to demonstrate that it is not a hazardous waste. If analysis suggests that the building material may be hazardous waste, please consult with DEQ.

Both consultants propose similar testing programs and dust removal plans that appear to address worker safety issues that are generally not regulated by DEQ. If significant dust is present, lead dust abatement (cleaning or encapsulation) may be more useful than an extensive wipe sampling program. This should address worker safety although we recommend you contact OR-OSHA for additional discussion (502-229-5910, OR-OSHA Consultation Services).



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## Department of Environmental Quality

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August 29, 2000

George Scott  
Port City Development Center  
1847 East Burnside Street  
Portland, Oregon 97214

John W. Finklea  
3223 SW Naito Parkway  
Portland, Oregon 97201

Re: Port City Development  
A.k.a. Wagstaff Battery  
ECSI # 1243

Dear Mr. Finklea and Mr. Scott:

The Department of Environmental Quality (DEQ) has approved the development plans for the Port City Development Center to be located at 2124 N. Williams Avenue in Portland, Oregon. In accordance with our meeting on August 11, 2000, Port City has agreed to incorporate the following items into their development plans: inspection/investigation of sump 1A; field screening for potential contamination when previously, uninvestigated areas or suspect areas are uncovered; and development of a contingency plan for managing potentially contaminated soils, if encountered during construction.

If you have additional questions or if I can be of assistance, please contact me at 229-5445. As a separate note, effective September 8<sup>th</sup>, I will be transferring to a new position at DEQ and Tom Roick, currently peer review for your site, will assume the lead project manager role. Tom may be reached at 229-5502. Thank you for your cooperation with DEQ's Voluntary Cleanup Program and in restoring this site to productive use.

Sincerely,

Sheila A. Monroe  
Project Manager  
Voluntary Cleanup and Portland Harbor Section

Cc: Tom Roick, DEQ  
Tom Gainer, DEQ