

State of Oregon
Department of Environmental Quality

Memorandum

Date: September 1, 1992

To: Loretta Pickerell:ECD and Abby Goldenberg:ECD
RP
From: Raimond Peterson:NWR
Subject: Wagstaff Battery Manufacturing Company, referral to
ECSI.

Wagstaff Battery Manufacturing Company is located at 2124 N. Williams Avenue, Portland, Oregon 97227. For over twenty years, it manufactured industrial batteries. Within the last year, all manufacturing has stopped, and the business now functions as a distributor of batteries as well as a collection facility for old industrial batteries. These old batteries are not broken down at the facility, but only stored until they are shipped to a recycler. It appears that, in time, even this activity may cease as the owner seems to be working towards the possible sale of the property. Old acid tanks and other manufacturing equipment is being dismantled slowly, and some site assessment is being carried out in conjunction with this process. Wagstaff has retained the Technical Action Group (TAG) as consultants to help in this assessment and perhaps in any needed site cleanup. The TAG contact is Tim Wyndham (503) 643-9218. The Wagstaff contact is the president and owner, Bruce Hindman (503) 282-5531.

Staff of the NWR have recently carried out a RCRA inspection of the facility and have found no significant hazardous waste problems. All acids and lead byproducts still on the property will be appropriately recycled. This inspection did bring attention to some potential past practices contamination, and Kim Cox of the Region's RCRA program and I paid another visit to the facility and met with both Mr. Hindman of Wagstaff and Tim Wyndham of TAG. Past practices contamination include the following:

* Interior lead contamination of walls, floors and other surfaces from former manufacturing processes. At this time, the concentrations are not well documented. This may or may not be of ECD concern.

* Soil contamination on the property and perhaps on the adjacent properties. From 1974 until 1992, Wagstaff has had some type of DEQ Air Pollution Discharge Permit. It was finally cancelled in July of this year when all manufacturing ceased. Over the years of operation, there have been complaints and local concerns over lead air pollution discharges from the facility. In 1986, the DEQ did collect soil samples from the facility and

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found soil concentrations as high as 4,000 mg/kg. Wagstaff was also part of a lead deposition study carried out by the DEQ for at least two years in the late 1980s. At Wagstaff, lead particulate fallout, in drop buckets was found to be as high as 16,500 mg/kg with an average of 1,900 mg/kg. It does not appear that data from this study was ever correlated into specific standards or guidelines, but the data do show that above normal quantities of lead particulate fallout were at times generated at the facility and deposited nearby. Further assessment and perhaps cleanup of lead contaminated soil at the facility and perhaps on adjacent properties is necessary.

* From 1972 until at least 1990, all general washing of the floors and other manufacturing areas including the lead oxide pasting area has generated lead contaminated and perhaps low pH (from sulfuric acid) waste water. This water was discharged to two sumps (metal holding tanks) in the floor of the facility. It was allowed to settle for a time and then discharged into a drywell behind and to the east of the manufacturing building. A water sample taken by the DEQ from one of the sumps in 1986 found total lead concentrations as high as 28 mg/l and TCLP (EP Tox) lead at 0.3 mg/l. These levels were in excess of the Department's permitted drywell discharge limits at that time (<0.05 mg/l). The surface area around the drywell was stained yellow with dead and stressed grass. This may be due to a building exhaust fan that discharged low pH condensate in that area.

There is no record that a drywell discharge permit was ever obtained or required by the DEQ, even though this discharge of waste water continued after the 1986 sampling. This sump and drywell system may be the source of subsurface soil lead contamination. Since the waste water was probably quite acidic, lead mobilization into the soil would have been enhanced through any flaws in the integrity of the system. This sump and drywell system should be further assessed and remediated if necessary. The facility should also be checked for any other possible pathways of waste water into the subsurface. On information from the owner, the groundwater is over 50 feet below the surface, and he feels that this drywell has not impacted it; however, this too should be further evaluated.

* There is an underground gasoline storage tank on the site, and, the plan is to work with the UST program for removal or decommissioning.

From the Region's recent discussions with the owner, it appears that it is his intention to do much of the assessment and, if needed, remediation or other cleanup. Since he appears to want

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to get the place in order for possible sale, this work may be sooner than later. The Voluntary Cleanup Program was thoroughly discussed as a possible option, but at this time, he has confidence in his consultant and will probably proceed on his own. Since he already plans to do a Level 1 or 2 environmental assessment, perhaps giving him some PA guidance or requiring a PA at this time might not be a bad idea.

This is probably a medium site since it is in a residential area and, the extent of lead contamination is not really known. A little more soil sampling and evaluation of the drywell situation will better define the extent of any environmental and public health problems.

Included is a copy of the Region's ECSI referral letter and a copy of the RCRA inspection memo to the Region's file.

If you need more information, please let me know.

Thanks.