

Oregon

DEPARTMENT OF
ENVIRONMENTAL
QUALITY

September 2, 1992

NORTHWEST REGION

MR BRUCE HINDMAN
WAGSTAFF BATTERY MFG CO
2124 N WILLIAMS
PORTLAND OREGON 97227

Re: ECD/HW - Multnomah Co.
Wagstaff Battery Mfg. Co.

Dear Mr. Hindman:

The Northwest Region of the Department of Environmental Quality has reviewed information indicating that in the past there was a release of hazardous substances on the property located at 2124 N. Williams, Portland, Oregon 97227.

This information indicates that the general operations of the battery manufacturing plant, during more than twenty years, have resulted in both interior surface contamination and outside soil and depositional lead contamination. Up to this point, only limited data are available. Soil samples taken by the Department and analyzed for total lead in 1986 found concentrations as high as 4,000 mg/kg in areas adjacent to the building. Particulate fallout (PFO) studies carried out by the Department for over two years found lead concentrations in the PFO samples as high as 16,500 ppm with an average of 1,900 ppm.

In addition, from 1972 to 1990, a drywell on the property has received waste water from the general washing and cleanup of the manufacturing facilities including the lead oxide pasting area. A water sample from a sump associated with this drywell was found to contain total lead at 28 mg/l and leachable lead at 0.3 mg/l during Departmental sampling in 1986. These levels were in excess of the Department's permitted drywell discharge limits at that time (<0.05 mg/l).



1500 SW First Ave
Suite 750
Portland, OR 97201
(503) 229-5263
DEQ-1

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Your Regional file has been located and the above cited data is from that file. It also appears that while you did have an air quality permit, no drywell discharge permit was ever issued. Correspondence to Wagstaff Battery from the Department dated 8/4/86 mentions the need for a discharge permit if drywell discharge was to be continued and sets discharge limits for lead, but nothing in the Regional file indicates that a drywell discharge permit was ever applied for or issued. I will continue to check into this, and if you have any information to the contrary, please send me copies of such information.

In any event, a review of this situation has concluded that there exists a significant potential for surface and subsurface lead contamination of the soil and at least the potential for groundwater contamination. Any further site assessment or remediation activities regarding the contamination issues at this site are beyond the jurisdiction and the scope of responsibilities of the Northwest Region in these matters. Therefore, the information from this site will be referred to the Department's Environmental Cleanup Division (ECD) for further action pursuant with Oregon's Environmental Cleanup Law and implementing regulations, ORS 465.200 to ORS 465.900 and OAR 340-122-427 to OAR 340-122-470 or with the federal Comprehensive Environmental Response, Compensation, and Liability Act, (CERCLA) or Superfund, as amended, 42 USCA 9601-9675.

Upon referral, ECD will add the site to its Environmental Cleanup Site Information system (ECSI), a database of sites with suspected contamination by hazardous substances. ECD will notify you prior to initiating any further action on this site in accordance with its priorities.

Both state and federal environmental cleanup laws describe the persons responsible for the investigation and cleanup of contaminated sites, ORS 465.255 and 42 USCA 9607. This letter is not a determination that you are or are not responsible for the investigation and cleanup of this site under those provisions. However, as the current owner or operator of the property, you have a number of options for further action at this site, including the following:

- 1.) You may wait until the ECD notifies you of its intent to pursue further action at the site, and at that time determine the extent of your responsibilities for further investigation and cleanup. This may take some time because of the number of sites currently being evaluated. You may contact ECD regarding their schedule for this site.

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- 2.) You may investigate and, if needed, cleanup the site on your own initiative and without ECD oversight. Please inform ECD of any plans for further investigation and cleanup, and maintain complete documentation of your activities for subsequent review by ECD. ECD will review your work in accordance with its priorities and determine whether or not further action is needed.
- 3.) You may request ECD to oversee your investigation and cleanup of the site through its Voluntary Cleanup Program. This Program allows persons to investigate and cleanup sites in accordance with their time frames and with ongoing oversight. For information on the Voluntary Cleanup Program, please contact Mike Rosen at (503) 229-6712.

If you have any further questions, please contact me at (503) 229-6385 ext. 232 or ECD at (503) 229-6170.

In another matter related to our recent site visit, it has been determined that you will not be required to obtain an EPA ID number for transporting your lead oxide waste or the lead liners from the closed sulfuric acid tanks. If you have any further questions on this matter, please contact Kim Cox at (503) 229-6385 ext. 239.

Sincerely,

Raimond Peterson

Raimond Peterson
Environmental Specialist
Northwest Region

cc: Loretta Pickerell, ECD
Abby Goldenberg, ECD
Mike Rosen, ECD
Kim Cox, NWR