



Oregon

John A. Kitzhaber, M.D., Governor

Department of Environmental Quality

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May 24, 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 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.

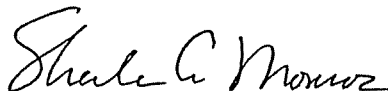
- B. After cleaning sump 1A of sludge, inspect for holes, cracks, corrosion points, etc., where fluids may have leaked from the sump to the subsurface. If the integrity of the sump has been compromised, then investigate for potential contaminants beneath the sump. DEQ would become more involved in a 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