

State of Oregon

Department of Environmental Quality

Memorandum

To: John W. Finklea
George Scott

Date: July 11, 2000

From: Sheila Monroe *SM*

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).