1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 • Dan Saltzman, Commissioner • Dean Marriott, Director

December 13, 2011

Alex Liverman Department of Environmental Quality 2020 SW 4th Avenue, Suite 400 Portland, OR 97201-4987

Subject: Request for DEQ Site Assessment of Peninsula Iron Works Property at 6618 N.

Alta Avenue

Dear Alex:

The City has completed a source investigation in Basin 52 as part of the City's ongoing Remedial Investigation associated with the Portland Harbor City of Portland Outfalls Project, being conducted pursuant to the August 13, 2003 Intergovernmental Agreement (IGA) between the Oregon Department of Environmental Quality (DEQ) and the City Bureau of Environmental Services (BES). In response to a preliminary review of stormwater data collected from Basin 52. in 20071, the City conducted an inline solids investigation in the basin between 2008 and 2010 to identify potential sources of polychlorinated biphenyls (PCBs) to Basin 52. Inline solids results indicated the presence of a previously unidentified source within the basin, which lead to a targeted investigation of erodible and subsurface soils in areas adjacent to the suspected source. These data indicate that contaminated erodible soils in the vicinity of the Peninsula Iron Works facility at 6618 N. Alta Avenue are a major current source to the basin. Offsite migration of contaminants from Peninsula Iron Works operations may have resulted in observed contamination in the adjacent rights-of-way and City property.

Peninsula Iron Works (PIW) is located adjacent to Cathedral Park (see Attachment 1). It is bounded on the west by the unimproved North Bradford Street right-of-way and UPRR rail line, to the north by N. Alta Ave., to the east by N. Crawford St., and to the south by a parking area owned by the City of Portland Bureau of Parks and Recreation.

City Source Investigation²

In 2008, the City collected a sediment sample from a catch basin (CB ANE911) located at the northwest corner of the facility (see Attachment 1). The total PCBs concentration in the sample exceeded 8,000 µg/Kg. Following the receipt of this result, the City completed a number of additional source investigation and control activities in the vicinity of the site to define the suspected source area. Activities are summarized as follows:

¹ Stormwater Evaluation Report, City of Portland Outfall Project, ECSI No. 2425. Prepared by the City of Portland, Bureau of Environmental Services, Portland Harbor Program. February 2010.

² Basin 52 Source Investigation Data. Transmittal from Linda Scheffler (BES) to Karen Tarnow (DEQ). June 16, 2011.

- January 2010: cleaned CB ANE911, the lateral line from the catch basin to the main storm line on N. Alta Ave., the storm line segment downstream of the catch basin lateral connection, and the storm line extending along the rail corridor northwest of the PIW facility.
- February June 2010: deployed an inline sediment trap in a Basin 52 storm line segment downstream of the lateral connection from CB ANE911 and collected and analyzed trapped solids.
- September 2010: collected and analyzed sediment from CB ANE911.
- January 2011: collected and analyzed erodible soils from the N. Bradford St. right-of-way
 in the vicinity of the site.
- September 2011: collected and analyzed subsurface soil samples from the parking lot adjacent to the south side of the site and erodible soil samples from Cathedral Park pedestrian areas in the vicinity of the site.

Attachment 1 includes a figure depicting sample locations and total PCBs concentrations for these investigations and a table summarizing analytical results. Data indicate that the PIW site is a likely current and/or historical source of PCBs detected in the Basin 52 conveyance system, in the N. Bradford St. right-of-way, and on adjacent City property.

Data Evaluation

In September 2008, total PCB Aroclors were detected in CB ANE911 at a concentration of 8,160 μ g/Kg. Following the January 2010 line cleaning activities in Basin 52, total PCB congeners were detected at a concentration of 924 μ g/Kg in the downstream manhole AAE513 sediment trap sample (June 2010), indicating a PCBs source (see Attachment 1)³. Because this sampling location represents discharge from the majority of the northern Basin 52 drainage area, the City also resampled sediments that had accumulated in CB ANE911 since the January 2010 cleanout. The catch basin data (September 2010) were used to evaluate whether contaminant concentrations in sediments indicates a current source, and if so, whether that source likely represents the most significant source to the manhole AAE513 sediment trap location. Total PCB congeners in the follow up sample from CB ANE911 were 2,350 μ g/Kg. These data indicate the presence of a PCBs source within the CB ANE911 drainage area.

There are no piped connections to CB ANE911. Runoff from the PIW site and other areas, such as N. Alta and N. Bradford Streets, discharges to this inlet. To determine the source of contaminated sediment to CB ANE911, the City sampled erodible soils in the vicinity of the catch basin in January 2011 (see Attachment 1). Total PCBs concentrations were highest along the N. Bradford St. right-of-way closest to the site (\sim 7,000 to 21,000 μ g/Kg). These concentrations also exceeded the concentration detected in CB ANE911. PCB Aroclor 1260 was the only Aroclor detected in CB ANE911 and all erodible soils samples. Results indicate that contaminated erodible soils in the vicinity of PIW and N. Bradford St. are a significant source to CB ANE911.

 $^{^3}$ An additional concurrent sediment trap sample was collected in Basin 52 upstream of this location and the PIW site; Total PCBs were detected at 20-55 μ g/Kg.

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In September 2011, the City advanced five borings in the parking lot adjacent to the south side of the PIW building. The City acquired this property from Multnomah County in the early 1970s for the creation of Cathedral Park. Historical records, such as Sanborn maps (see Attachment 2) and aerial photos (see Attachment 3), indicate that PIW operations occurred in this area that is now used as a paved parking lot. PCBs were detected in subsurface soils (0.5′-5′) from three locations at concentrations between approximately 200 and 1,000 µg/Kg.

PCBs also were detected at elevated concentrations in erodible soils samples collected from Cathedral Park pedestrian areas near this parking lot. Highest concentrations (1,080 -4,310 µg/Kg) were observed in the three samples collected north of the sidewalk that parallels the south side of the parking lot, suggesting that PCBs in erodible soils in this area decrease with distance from the PIW site. If the PIW site is a historical and/or current source of PCBs in this area, offsite migration via vehicle and equipment dragout, overland runoff, fugitive dusts, and direct releases may all have contributed to PCBs concentrations observed in the vicinity of the site.

Total PCBs concentrations in erodible soils with a complete pathway to the river via Basin 52 exceed Portland Harbor Joint Source Control Strategy screening level values and were higher than any charted values provided in Appendix E of the *DEQ Guidance for Evaluating the Stormwater Pathway at Upland Sites*. Erodible soils concentrations in North Bradford St. and adjacent Cathedral Park areas may exceed relevant risk-based concentrations. For these reasons, erodible soils at and in the vicinity of this site warrant investigation and control.

PIW Operations

PIW has operated at this location for close to 100 years. Records indicate that operations also extended onto other adjacent parcels on the east side of the rail line. Areas on the west side of the rail line also may have been used for material storage and transport. Sanborn maps from 1905, 1911, 1924-1928, 1950, and 1969 are provided in Attachment 2. Historical aerial photographs show areas of soil disturbance to the south, west, and north of the site (see Attachment 3). Plumbing records confirm discharge connections to offsite conveyance systems dating to 1917 (see Attachment 4).

Current and historical operations at the site, documented in readily available records, included foundry and machining operations as well as oil storage. Foundry operations can be associated with PCBs. Two foundry sites in Portland have been investigated under DEQ Cleanup Program oversight; both properties identified PCBs on site at concentrations warranting control⁴.

PIW operations are covered by a Standard Industrial Code (SIC 35) that requires National Pollutant Discharge Elimination System (NPDES) permit coverage. DEQ issued an NPDES permit to the site for a brief portion of 2001; the site currently maintains a No Exposure Certification for stormwater.

Basin 52 discharges to the Willamette River into an area of Portland Harbor identified by the U.S. Environmental Protection Agency (EPA) as an area of potential concern (AOPC 11) based on elevated concentrations of PCBs and other contaminants detected in inriver sediment. In

⁴ PECO, Inc. (ECSI No. 1973) and SFI Property (ECSI No. 5103).

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support of the mutual objectives of the IGA, the City requests DEQ Site Assessment review of this property to determine whether Cleanup Program involvement is needed to address site contamination issues.

Please let me know if the City can assist with any additional information and thank you for your assistance with this concern.

Sincerely,

Linda Scheffler

Water Resources Program Manager

Portland Harbor Program

Enc.: Attachment 1 - Source Investigation Results in the Vicinity of PIW

Attachment 2 – Sanborn Maps Attachment 3 – Aerial Photographs Attachment 4 – Plumbing Records

cc: Richard Muza/EPA

Richard Muza/EPA Kristine Koch/EPA Jim Anderson/DEQ

Kim Cox/BES

David Johnson/Peninsula Iron Works

Attachment 1 Source Investigation Results in the Vicinity of PIW

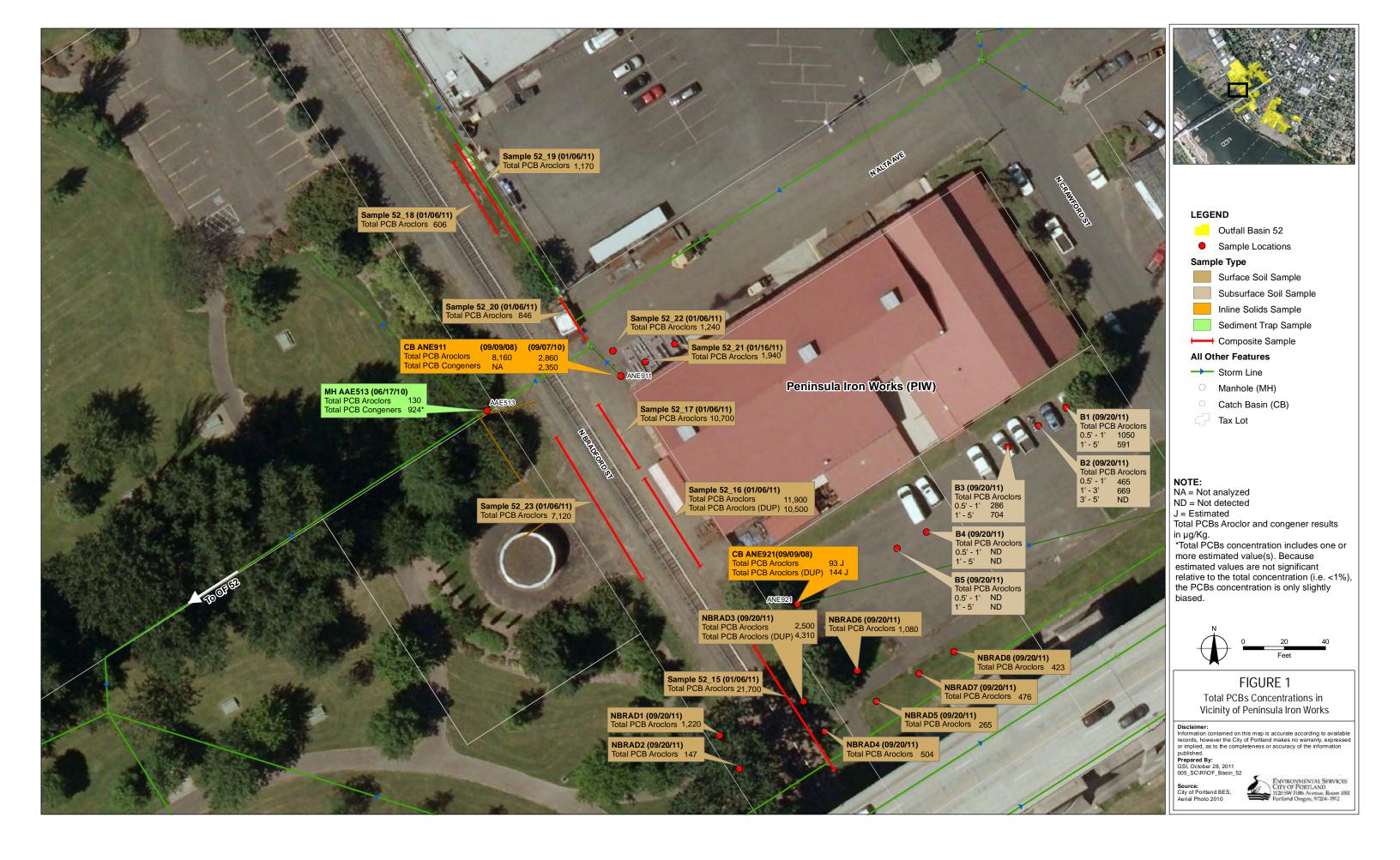


Table 1
Source Investigation in the Vicinity of Peninsula Iron Works
Total PCBs in Surface Soils, Subsurface Soils, and Inline Solids

Surface Soil Samples							
Sample		Total PCB Aroclors (1)	Total PCB Congeners ⁽²⁾				
Location	Date	$(\mu g/Kg)$	$(\mu g/Kg)$				
52_15	1/6/2011	21,700	NA				
52_16	1/6/2011	11,900	NA				
52_16 (Dup)	1/6/2011	10,500	NA				
52_17	1/6/2011	10,700	NA				
52_18	1/6/2011	606	NA				
52_19	1/6/2011	1,170	NA				
52_20	1/6/2011	846	NA				
52_21	1/6/2011	1,940	NA				
52_22	1/6/2011	1,240	NA				
52_23	1/6/2011	7,120	NA				
NBRAD1	9/20/2011	1,220	NA				
NBRAD2	9/20/2011	147	NA				
NBRAD3	9/20/2011	2,500	NA				
NBRAD3 (Dup)	9/20/2011	4,310	NA				
NBRAD4	9/20/2011	504	NA				
NBRAD5	9/20/2011	265	NA				
NBRAD6	9/20/2011	1,080	NA				
NBRAD7	9/20/2011	476	NA				
NBRAD8	9/20/2011	423	NA				

Subsurface Soil Samples							
Sample			Total PCB Aroclors (1)	Total PCB Congeners ⁽²⁾			
Location	Depth	Date	$(\mu g/Kg)$	$(\mu g/Kg)$			
B1	6"-12"	9/20/2011	1,050	NA			
DI	1'-5'	9/20/2011	591	NA			
	6"-12"	9/20/2011	465	NA			
B2	12"-36"	9/20/2011	669	NA			
	36"-60"	9/20/2011	10 U ⁽³⁾	NA			
В3	6"-12"	9/20/2011	286	NA			
БЭ	1'-5'	9/20/2011	704	NA			
B4	6"-12"	9/20/2011	10 U ⁽³⁾	NA			
Бт	1'-4'	9/20/2011	10 U ⁽³⁾	NA			
B5	6"-12"	9/20/2011	10 U ⁽³⁾	NA			
В3	1'-5'	9/20/2011	10 U ⁽³⁾	NA			

Inline Solids Samples							
Sample			Total PCB Aroclors (1)	Total PCB Congeners ⁽²⁾			
Location	Sample Type	Date	$(\mu g/Kg)$	$(\mu g/Kg)$			
CB ANE911	Inline Solids	9/9/2008	8,160	NA			
CB ANE911	Inline Solids	9/7/2010	2,860	2,350			
CB ANE921	Inline Solids	9/9/2008	93 J	NA			
CD ANE921	Inline Solids (Dup)	9/9/2008	144 J	NA			
MH AAE513	Sediment Trap	6/17/2010	130	924 ⁽⁴⁾			

Notes:

CB = Catch Basin

J = The result is an estimated concentration due to pattern overlap or inconsistent QC results that indicate non-homogenous sample matrix.

MH = Manhole

NA = Constituent was not analyzed

U = The analyte was not detected above the reported sample quantification limit.

 $\mu g/Kg = Micrograms per kilogram$

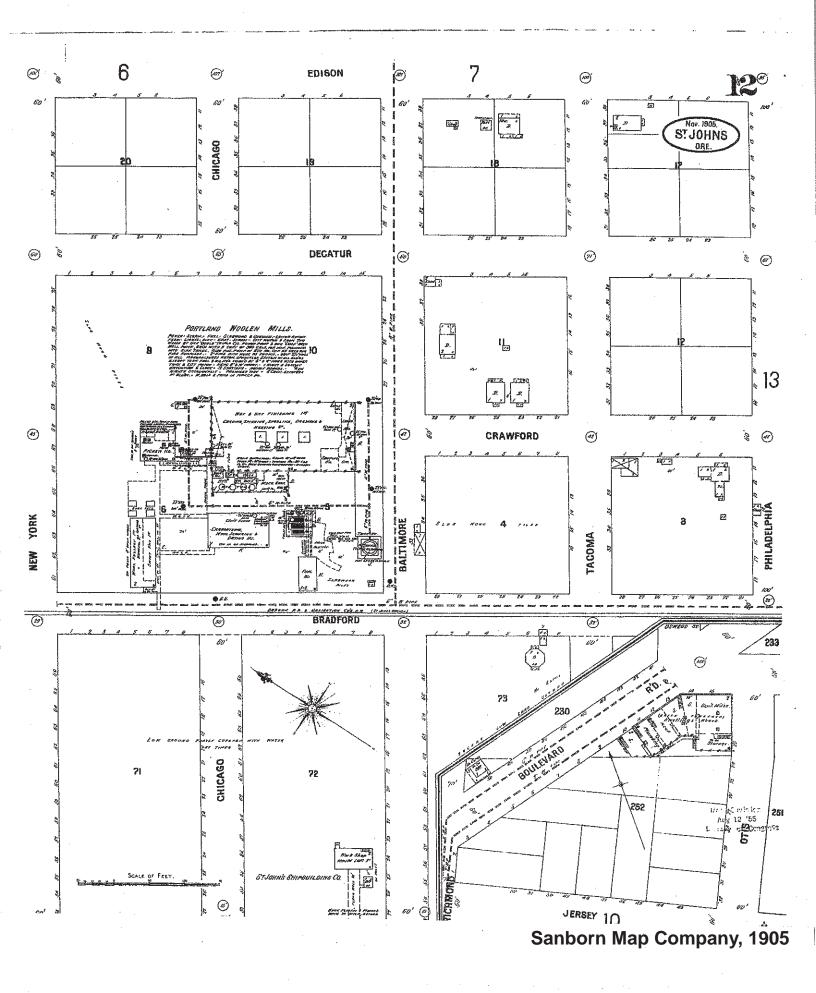
⁽¹⁾ Total PCB Aroclors concentrations in all samples (except at CB ANE921) represent the concentration of Aroclor 1260, as this was the only detected Aroclor. PCB Aroclors 1260 and 1254 were detected in the catch basin sediments collected from CB ANE921.

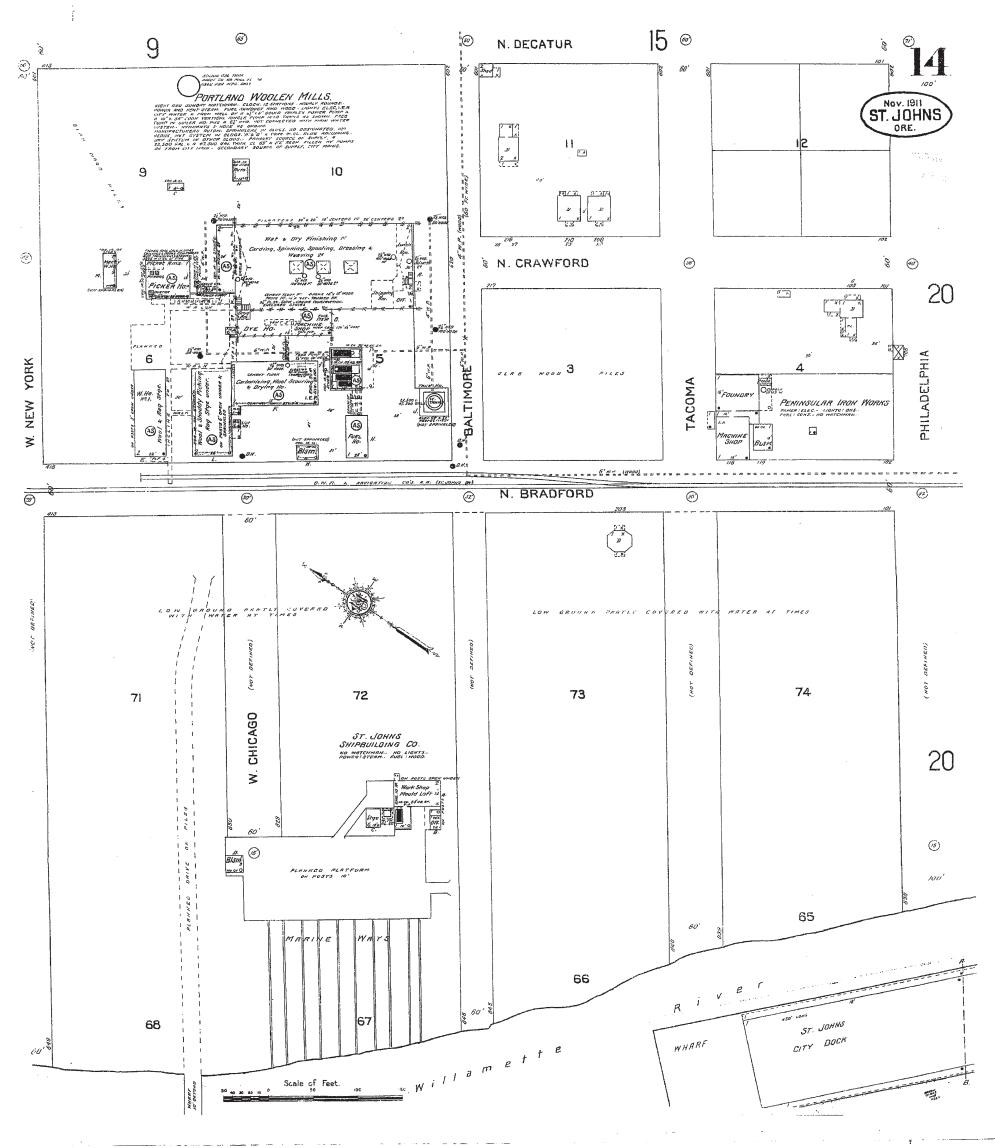
 $^{^{(2)}}$ Total PCB Congeners are calculated by assigning "0" to undetected constituents and to results flagged with "EMPC".

⁽³⁾ Detection limit is for Aroclor 1260.

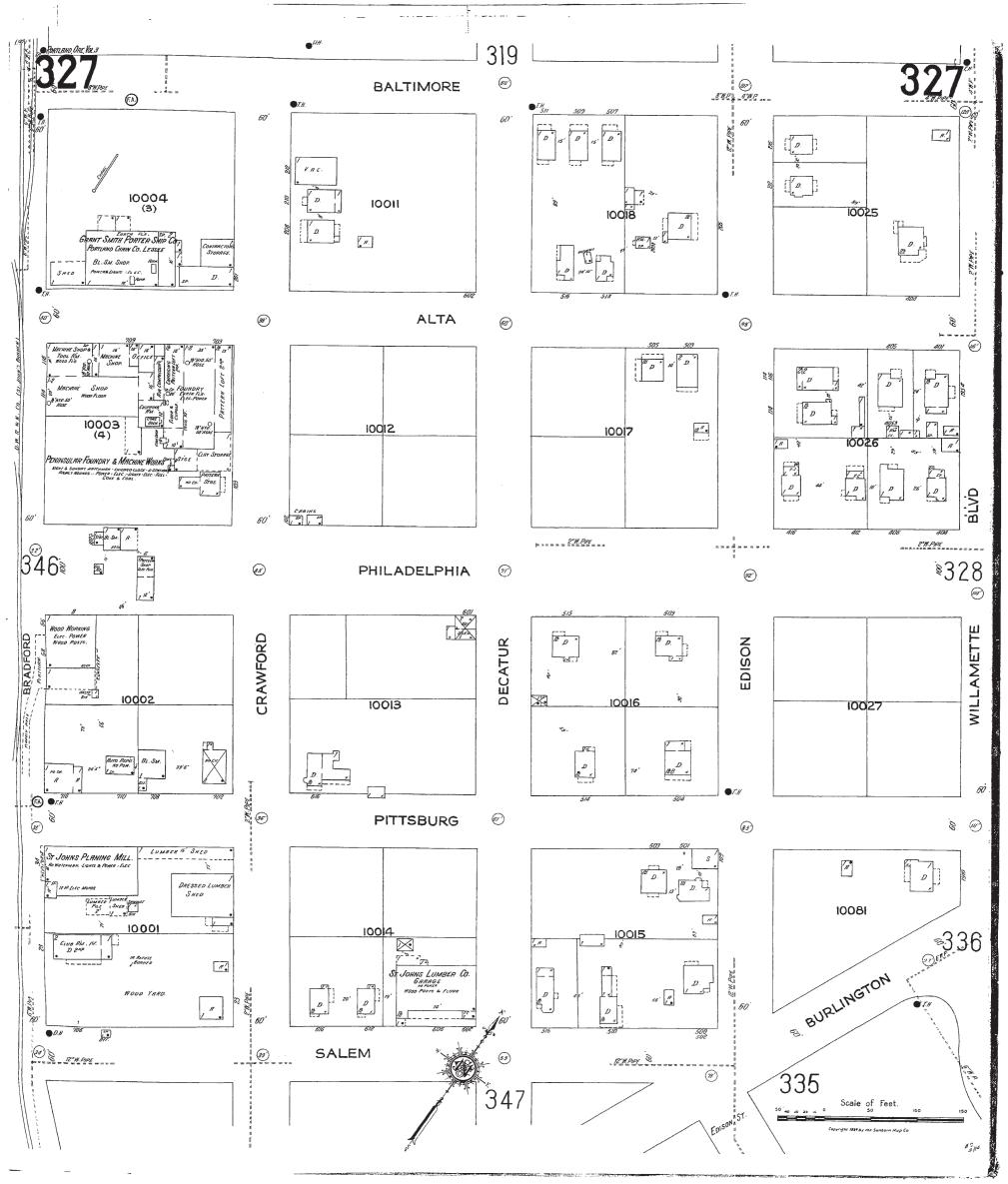
⁽⁴⁾ Total PCBs concentration includes one or more estimated value(s). Because estimated values are not significant relative to the total value (i.e., < 1%), the Total PCBs concentration is only slightly biased.

Attachment 2 Sanborn Maps

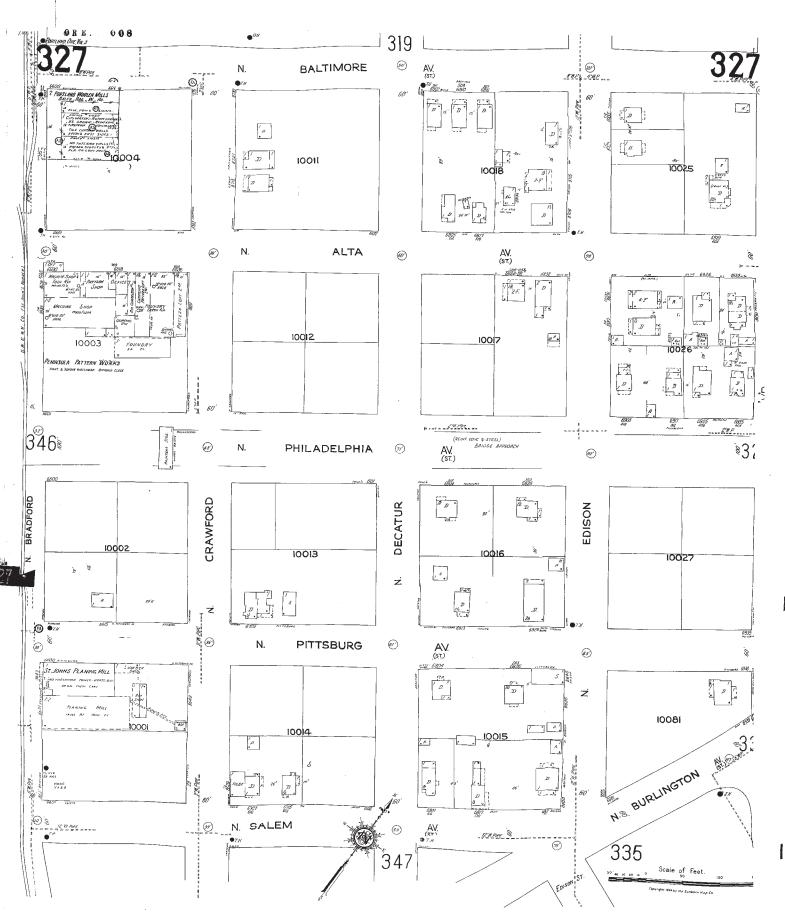




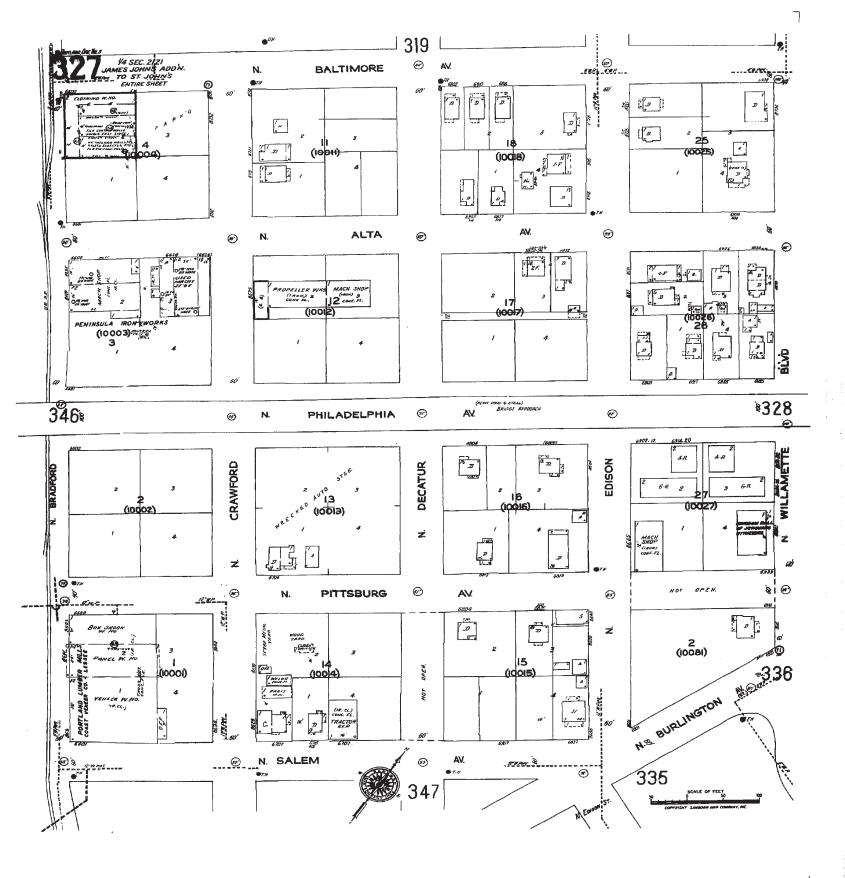
Sanborn Map Company, 1911



Sanborn Map Company, 1924-1928



Sanborn Map Company, 1924 with additions and corrections to June 1950



Attachment 3 Aerial Photographs















Attachment 4 Plumbing Records

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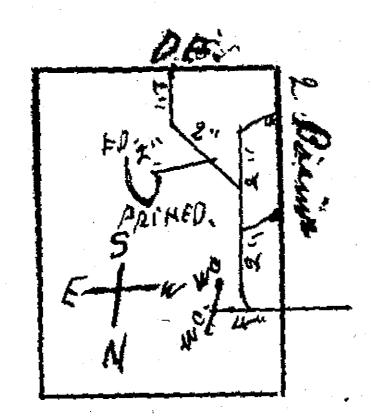
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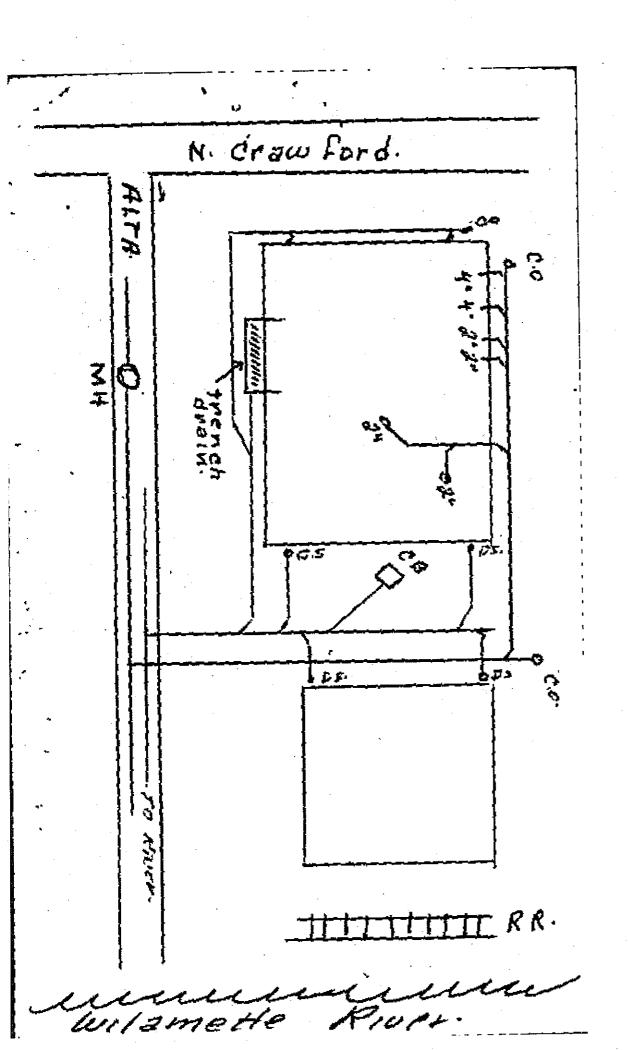
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