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Subject: Cathedral Park Investigation
Date: Friday, January 7, 2022 10:44:34 AM
Attachments: [City of Portland Letter to Oregon DEQ \(February 2013\).PDF](#)
[1977 Aerial Photo Looking Over St. John's Bridge.pdf](#)
[1941 Aerial Photo - Looking north towards St. Johns Bridge.pdf](#)
[PCB Samples in Vicinity of Peninsula Iron Works.pdf](#)

Franziska –

Enrolling in the Voluntary Cleanup Program

In response to Oregon DEQ's letter dated October 11, 2021, to Lauren Mancuso at Union Pacific, Union Pacific has agreed to enroll in the Voluntary Cleanup Program and conduct an evaluation of PCB impacts in its right-of-way near Cathedral Park. The objective of the evaluation would be to assess the current magnitude and distribution of PCBs within Union Pacific's right-of-way. Union Pacific's consultant Jacobs is preparing the application to the VCP and a sampling work plan for submittal to DEQ.

Responding to Peninsula Iron Works

We reviewed the response provided to DEQ by Peninsula Iron Works' (PIW) representative Evren Northwest, Inc. (Evren) in a letter dated November 17, 2021. For the following reasons we do not agree with Evren's determination that PIW is not a source of PCBs in this area:

- Evren stated that PIW used molasses rather than conventional PCB-containing oils in its operations. However, Evren does not identify when PIW used molasses in its casting process and provides no records of the quantities of molasses used.
- Evren stated that PIW did not use transformers or other electrical equipment containing PCBs. However, it is possible that PCB-containing transformers may have been located outside PIW's building and that other PCB-containing equipment such as capacitors, controllers, switches may have been used inside the building as part of PIW's operations.
- Evren stated that a wipe sample of PIW's concrete floor collected in 2012 when an old air compressor unit was removed did not indicate the presence of PCBs within the facility. However, the air compressor likely dates back to at least 1924, prior to the installation of concrete floors. There is no record of sampling soil beneath the floor where PCBs are more likely present from historical operations.

We agree with the City of Portland's conclusion in its letter to DEQ dated February 1, 2013: "PIW's industrial operations (foundry, machine shop, metal fabrication, etc.) have been conducted at this location for over 100 years. Findings at several other

Portland-area foundries that have been investigated under DEQ oversight provide a compelling linkage between foundry operations and PCBs, and data collected by the City indicate that historical site operations likely contributed to contamination observed in adjacent surface and subsurface soils” (attached, page 4).

Evren also infers that Union Pacific is the source of the highest concentrations of PCBs detected by the City in 2011. Evren repeats the allegation by one of PIW’s principals that “during the late 1960s and early 1970s, railroad personnel would pour lube oil from a black bucket with a pour spout on the rail switch plates associated with the northwest railroad spur on a frequent basis.” Evren notes that the former rail spur is located in the area where the highest concentration of PCBs were detected – 21,700 parts per billion in sample 52_15. This location is identified with a green arrow near the bottom right on the attached figure “PCB Samples in Vicinity of Peninsula Iron Works.”

We reviewed Union Pacific’s available historical records for its operations in this area and in the Portland area in general. Union Pacific’s records indicate that lubricating oils currently used on older mechanical and hydraulic switches do not contain PCBs. Dielectric and hydraulic oils used on Union Pacific’s locomotives operating now and in the past do not contain PCBs. In addition, there are no records of derailments, spills, or leaks from Union Pacific’s trains in this area. Fueling, maintenance, and repair activities are not conducted in this area. It is not likely that lubricating oils containing PCBs were ever used by Union Pacific in the Portland area considering the very low concentrations (below screening levels) or absence of PCBs in soil sampled at Albina Yard where multiple switches and mechanical equipment are located.

Finally, although a rail spur near the vicinity of sample location 52_15 is shown on a 1924 sanborn map, the spur was likely removed when the St. John’s Bridge was constructed over this location in the late 1920s. The rail spur is not present in the attached 1941 and 1977 aerial photos of St. John’s Bridge. The PIW facility is circled in red on the two photos. The spur was removed much earlier than when PCBs become widely used in commercial products such as lubricating oils. We question the credibility of the PIW principal who supposedly observed buckets of oil being poured over a switch that was removed decades earlier.

Based on current information we do not believe Union Pacific’s operations are a source of PCBs in this area.

Conclusion

As stated above, Union Pacific is willing to enroll in the VCP and collect samples along its right-of-way.

Union Pacific recommends, in accordance with DEQ’s October 2021 letter to PIW, that PIW be required to collect samples in and around its property. In addition, based on the number of industrial operations in this area near Cathedral Park in the era when PCBs were commonly used, there are other likely sources that contributed PCBs to this area. Union Pacific recommends DEQ continue its effort to identify other

probable sources of PCBs and request that the responsible companies, if still viable, participate in the effort to remediate PCBs.

I look forward to coordinating with you on this project. I would like to schedule a call with you and Kevin Parrett to discuss our proposal for this project. Dave Hodson and Mark Ochsner from Jacobs would also participate in the call. Please let me know your availability. Thanks.

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