



PERSONAL AND CONFIDENTIAL

Main Office: PO BOX 14488, Portland, Oregon 97293
Main Tel: (503) 452-5561 / E-Mail: ENW@EVREN-NW.com
Satellite Offices: Bend, Oregon / San Rafael, California

June 8, 2023

Peninsula Iron Works
PO Box 83067
Portland, OR 97283-0067
Attn: Dave Johnson

RE: Temporary Mitigation Measure
N Bradford Street / Union Pacific Railroad Right-of-Way
Peninsula Iron Works Facility Building 2
6618 N. Alta Avenue, Portland, OR
ODEQ ECSI#: 6480

Dear Mr. Johnson:

EVREN Northwest, Inc. (ENW) has prepared this summary of placement of a temporary mitigation measure consisting of a temporary geotextile cover over bare polychlorinated biphenyl (PCB)-impacted surface soil within portions of the N Bradford Street / Union Pacific Railroad (UPRR) right-of-way (ROW) between Peninsula Iron Works (PIW) Facility Building 2 to the east and Cathedral Park to the west (subject site; see Figures 1 [Site Vicinity Map] and Figure 2 [Site Plan]) in an industrial area of N Portland.

This temporary cover was placed pursuant to Work item 5.A. *"Timely and Temporary Cover of Bare PCB Impacted Soil"* in Order on Consent for Removal Action No. LQVC-NWR-23-01 issued to PIW by Oregon Department of Environmental Quality (DEQ), signed May 22, 2023.

Respondent shall place and maintain a temporary cover on bare surface soils impacted by PCBs on and adjacent to the PIW property to protect public health, safety, and welfare and the environment. The PCB impacted soils will be further addressed in Subsection B and a DEQ approved work plan. This work is on-going and began under the voluntary cleanup letter agreement.

Background

A railroad spur formerly owned by UPRR occupies a portion of the N. Bradford Street / railroad ROW immediately west of the PIW site and east of City of Portland (City)-owned Cathedral Park. Investigations of PCBs as Aroclors on the subject property were initiated in 2008 by the City of Portland Bureau of Environmental Services (BES).¹ Subsequent investigations were conducted by

¹ City of Portland, May 2012. *Outfall 52, Source Investigation Report*.

ODEQ,² Union Pacific Railroad (UPRR),³ and most recently by ENW between November 2022 and January 2023.⁴ Based on the findings of these investigations, ODEQ required the placement of a temporary soil cover in the areas outlined on Figure 3.

Temporary Mitigation

On May 22, 2023, Janz Enterprises, Inc. (JEI) under ENW oversight installed a heavy-duty reinforced geotextile to cover bare PCB-impacted soil within the N Bradford Street / railroad ROW. A photographic log of the temporary mitigation installation is provided in Attachment A. Installation details are summarized in this section:

- **Permits and UPRR Oversight.** Since the temporary mitigation was at least 12 inches from the railroad tracks, and the ROW is not owned by UPRR, ENW was informed that a permit or access agreement with the railroad was not necessary. However, third-party rail safety coordinator (Rail Pros) was contracted to provide on-site oversight, safety instructions, set up derailment measures, and remove those measures when a train came through. JEI and ENW were instructed to remain 8 feet back from the tracks when unprotected. A Health and Safety tailgate meeting was conducted in the presence of ENW, JEI and Rail Pros.
- **Dimensions.** Two approximately 255-foot-long by 12-foot-wide sections of geotextile were placed along both sides of the railroad tracks to ensure coverage of bare soil and gravel in these areas.
 - **East Section.** Covers an approximately 3,000 square foot (sf) area bounded by an asphalt paved pedestrian pathway to the south, asphalt paved apron bordering PIW building to the east, gravel surface approximately 20 feet beyond N Alta Avenue to the north, and rail bed ballast rock for the railroad tracks to the west.
 - **West Section.** Covers an approximately 3,000 sf area bounded by an asphalt paved pedestrian pathway to the south, rail bed ballast rock for the railroad tracks to the east, gravel surface approximately 20 feet beyond N Alta Avenue to the north, and wood chip bedding, grass, and asphalt bordering Cathedral Park to the west.
- **Surface Preparation.** JEI filled in several low spots on the east side of the tracks with clean imported crushed rock prior to installing the geotextile to reduce potential safety hazards associated with trips and damage to the geotextile.

² Maul Foster Alongi, Inc., June 24, 2022. *Site-Specific Assessment Report, Cathedral Park Site*, DEQ Task Order 73-18-25, Prepared for Oregon Department of Environmental Quality.

³ Jacobs, March 2023, *Site Investigation Report, Union Pacific Railroad, PCB Areawide – N. Bradford Street Right-of-Way, Portland, Oregon*, Document no: 230216161638_003f5365 (Draft).

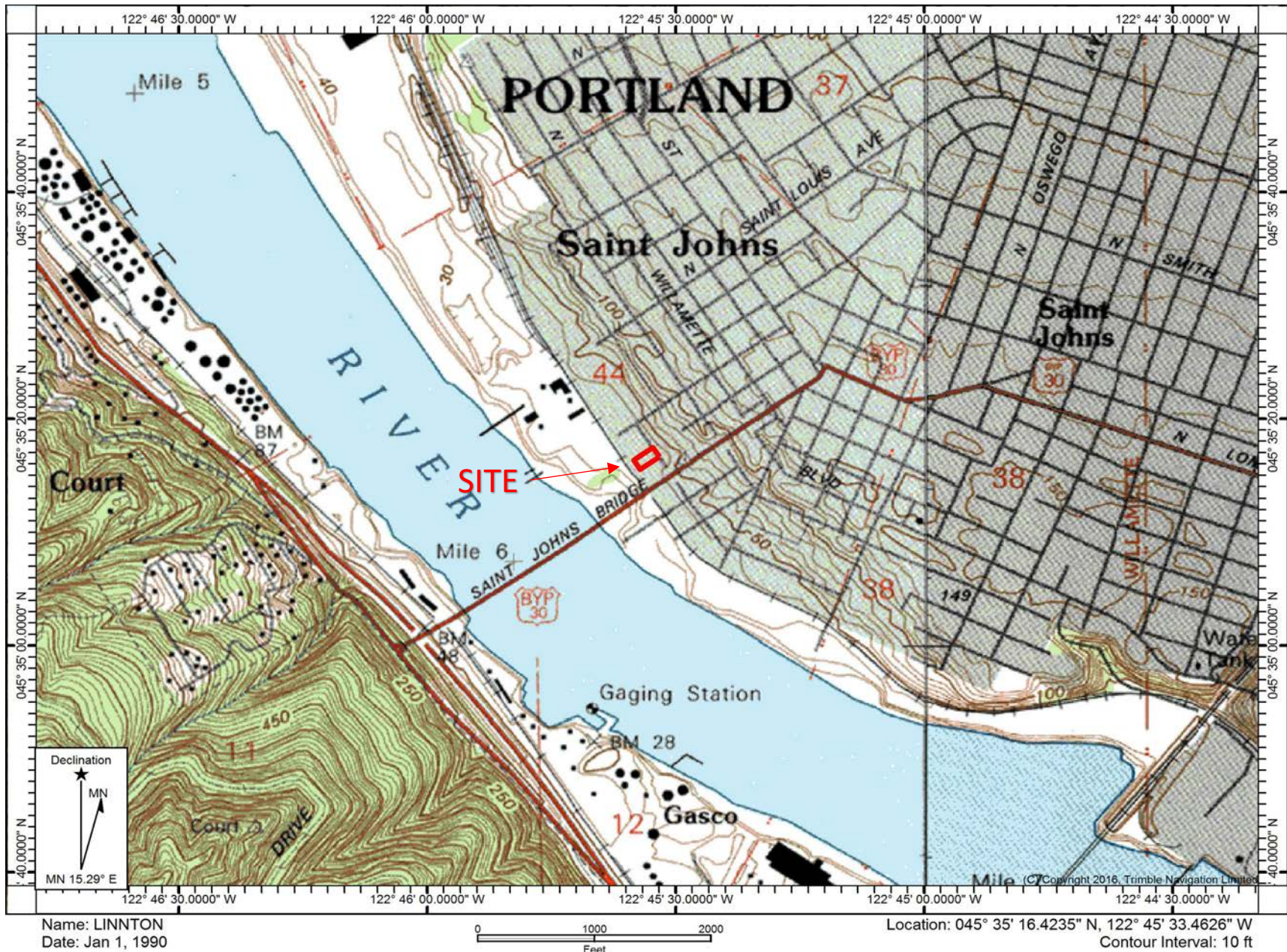
⁴ ENW, March 28, 2023. *Focused Surface Soil Investigation*, Peninsula Iron Works Facility Building 2, 6618 N. Alta Avenue, Portland, Oregon, ODEQ ECSI#: 6480, Prepared for Peninsula Iron Works.

- **Fastening the Geotextile.** The edges of the geotextile were folded under thereby doubling the thickness at the points of attachment. JEI used a combination of hammered concrete anchors, pneumatic driven nails, and pneumatic driven staples to secure the edges and middle of the east and west sections of geotextile. Concrete anchors and nails were fitted with round machine washers to help prevent the material from tearing. Fasteners were spaced approximately 6 to 12 inches around the perimeter and every 4 feet in two offset lines down the middle to secure each section of geotextile. Care was taken to ensure that there were no loose edges that could cause a trip hazard to recreational users.
- **Access to Manholes.** The geotextile was trimmed around sewer manholes and water covers to facilitate access to those features during the timeframe the temporary covers are in place.
- **Cleanup and Disposal.** Excess geotextile, fasteners, and other construction debris were picked up and properly disposed of as solid waste after the temporary mitigation measures were installed.
- **Deviations from Plan.** The east section width was less than 12 feet in places to account for the asphalt apron associated with the PIW building. ENW did not cover any asphalt surface more than a few inches necessary install fasteners. The geotextile cover was extended in two additional bare earth areas on the east side of the ROW to prevent potential occupational worker and recreational user exposure to PCB impacted soils in those areas.

Attachments:

Figure 1	Site Vicinity Map
Figure 2	Site Plan
Figure 3	Temporary Mitigation Plan
Photographic Log	

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Date Drawn: 5/31/2023
Drawn By: JOB
Approved By: LDG

Peninsula Iron Works – Building 2
6618 N Alta Avenue
Portland, Oregon

Site Vicinity Map

Project No.
351-21001

Figure No.
1



LEGEND:

SUBJECT PROPERTY BOUNDARY

SUBJECT BUILDING

- NOTES:
1. BASE MAP DEVELOPED FROM AN AERIAL PHOTOGRAPH MAP DATED 2018 AND ENW FIELD NOTES.
 2. ALL BUILDING, STREET, AND FEATURE LOCATIONS ARE APPROXIMATE.
 3. SYMBOLS REPRESENT LOCATION AND DO NOT ALWAYS REPRESENT EXACT SHAPE, SIZE, OR ORIENTATION.

APPROXIMATE SCALE

0 40 80 FEET

environmental, natural resource consultants
PO BOX 14488, PORTLAND, OREGON 97293
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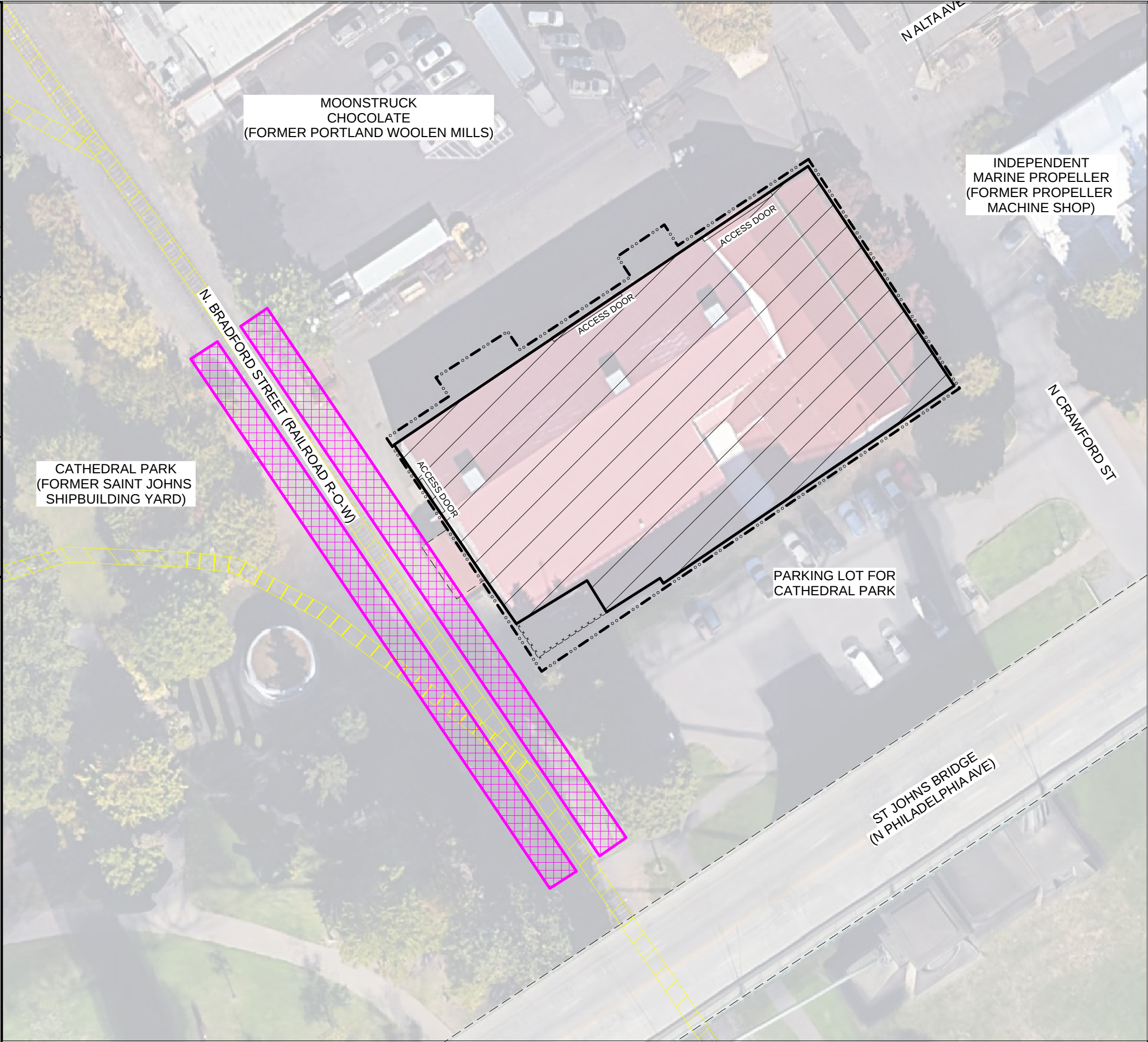
FIGURE 2
SITE PLAN
PENINSULA IRON WORKS - BUILDING 2
6618 N ALTA AVENUE
PORTLAND, OREGON

DRAWN BY
H. ROMER
06/01/2023

CHECKED BY
P. TRONE
06/05/2023

APPROVED BY
L. GREEN
06/05/2023

DRAWING NUMBER
1355-21001(v01)



LEGEND:

SUBJECT PROPERTY BOUNDARY

SUBJECT BUILDING

TEMPORARY SOIL COVER AREAS

RAILROAD

- NOTES:
1. BASE MAP DEVELOPED FROM AN AERIAL PHOTOGRAPH MAP DATED 2018 AND ENW FIELD NOTES.

2. ALL BUILDING, STREET, AND FEATURE LOCATIONS ARE APPROXIMATE.

3. SYMBOLS REPRESENT LOCATION AND DO NOT ALWAYS REPRESENT EXACT SHAPE, SIZE, OR ORIENTATION.

APPROXIMATE SCALE

0

40

80

FEET

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FIGURE 3

TEMPORARY MITIGATION PLAN

PENINSULA IRON WORKS - BUILDING 2
6618 N ALTA AVENUE
PORTLAND, OREGON



N Bradford Street (railroad ROW) prior to temporary mitigation - view looking southeast. St. Johns Bridge supports visible at the top of photo.



Railroad ROW prior to temporary mitigation – view looking northwest. Cathedral Park on far side of ROW.



Workers filling a low spot next to PIW building with clean imported crushed rock prior to geotextile installation.



Deploying a 12-foot-wide roll of heavy-duty geotextile starting at the southeast (uphill) side of railroad ROW.



Peninsula Irons Works
6618 N. Alta Avenue
Portland, Oregon

**Site
Photographs**

Project No.
1355-21001-10

Attachment
A



Securing the southeast end of the geotextile to the asphalt-paved pedestrian pathway by installing concrete anchors.



Using a pneumatic nail gun to secure the long edges of the fabric in gravel (left) and grass landscaped areas (right) – view northwest.



The geotextile was installed against, and secured to, the edge of the asphalt pavement west of the PIW building – view southeast.



Nails fitted with washers were used to secure the middle of the geotextile.



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Using a pneumatic nail/staple gun to secure the long edges of the geotextile in chip bedding (left) and gravel ballast (right) – view northwest.



Rail Pros removed derailment measures and asked workers to stand back 8 feet while a north-bound train passed through the work area.



Close-up showing the short edge of geotextile secured to asphalt pedestrian pathway.



Geotextile was fitted around a manhole cover to ensure it could be accessed, if needed..



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Attachment
A



Completed temporary mitigation on the upgradient east side of the railroad ROW – view northwest.



Multiple rows of staples were used to secure the west long edge of the geotextile in wood chip bedding.



Completed temporary mitigation on the downgradient west (Willamette River) side of the railroad ROW – view northwest.



Completed temporary mitigation on the upgradient east side of the railroad ROW – view southeast.



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Portland, Oregon

Site Photographs

Project No.
1355-21001-10

Attachment
A