



Oregon

Kate Brown, Governor

Department of Environmental Quality

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December 12, 2022

Chuck Grant
Grant Associates Inc
1017 Southeast 34th Avenue
Portland, Oregon 97214

Re: DEQ Comments on Expanded Baseline Investigation Work Plan
Airport Auto Salvage Property (ECSI No. 6484)
4623 Northeast Buffalo Street, Portland, Oregon 97219

Dear Mr. Grant:

The Department of Environmental Quality (DEQ) has reviewed the November 11, 2022, document entitled *Expanded Baseline Investigation Work Plan* prepared by Grant Associates Inc (Grant Associates) for the Airport Auto Salvage property at 4623 Northeast Buffalo Street in Portland, Oregon (site). Regulatory closure is being pursued for the site and the work plan proposes additional soil and groundwater characterization at the site. DEQ has prepared the following comments on the work plan.

General Comments:

- 1) DEQ recognizes that the work plan proposes one sampling event to complete the described soil and groundwater characterization. Although DEQ does not anticipate the need for additional sampling events, the results of this sampling event may dictate the need for additional sampling to satisfy regulatory closure requirements.

Specific Comments:

- 1) **3.0 Objectives:** DEQ issues a Stormwater Source Control Decision when contaminant sources have been controlled as necessary to minimize potential for contaminant migration to the Columbia Slough (ECSI# 1283) via stormwater discharge and that the resulting discharge is not likely to contaminate slough sediments. The work plan and report should identify what potential pathways (i.e., overland flow) exist to the adjacent stormwater ditch ('Ferrous Slough') and how frequently overland flow may occur. Typically, overland flow is evaluated by comparing erodible soil data against toxicity and bioaccumulation screening level values protective of that waterbody. Dependent on whether significant pathways exist to the ditch and erodible soils are at concentrations of concern, additional ditch sediment sampling may be necessary.

Please note that the Source Control Decision only addresses current sources and does not apply to potential historical releases to Columbia Slough sediment (ECSI#1283). Should you wish to resolve the Site's potential contribution to Columbia Slough sediment contamination in the future, an investigation and possible cleanup of Columbia Slough sediments near outfall AAL-553 (at NE 47th and Whitaker Slough) would need to occur. Alternatively, a settlement agreement to obtain a release from liability could be considered.

- 2) **4.1 Soil Quality SCP:** The elevated total lead concentration exhibited in the groundwater sample collected from B5 suggests there may be unknown source areas for contamination in soil. Due to the inherent variability of discrete sampling, DEQ recommends also implementing incremental sampling methods (ISM) at the site to reduce data variability and provide more reliable estimates of the mean contaminant concentrations. Please revise the workplan to include the division of the site into decision units based on areas of interest and the historical use of the site. Specific Decision Unit Characterization guidance can be found at: <https://www.oregon.gov/deq/FilterDocs/DUIMD.pdf>
- 3) **4.1 Soil Quality SCP:** DEQ recommends collecting and archiving additional soil samples at depths that would fully characterize the direct contact exposure horizon. If a soil sample collected at 1.5 feet below ground surface (bgs) contains elevated concentrations of analytes of concern, a deeper sample would be helpful to characterize the vertical extent of the contamination. The deeper soil samples can be archived and only analyzed if evidence of contamination is observed or confirmed by laboratory analysis in the 1.5 feet bgs soil sample.
- 4) DEQ generally concurs with the locations chosen for additional investigation, as shown on Figure 3. However, the entirety of tax lot 01100 has historically been used to store vehicles and additional soil and groundwater investigation on tax lot 01100 is recommended. Areas for investigation should include near B5 due to the elevated total lead concentration and in the southern portion of tax lot due to the historical storage of vehicles.
- 5) The investigation activities are generally limited to tax lots 01000 and 01100 with only boring B10 proposed for tax lot 03700. Please confirm if a no further action (NFA) determination is being sought for tax lots 01000 and 01100 only or all three tax lots.
- 6) **5.6 Monitoring Well Construction:** DEQ recommends permanent monitoring wells, opposed to temporary wells, particularly in the area near the dismantling shop and equipment shed. Groundwater data from properly constructed and developed monitoring wells are preferable to data obtained from grab samples, which can be biased by sample turbidity and may be slow to produce water. Additionally, permanent monitoring wells will establish a groundwater flow direction as well as seasonal variability.
- 7) **5.13 Analytical Testing:** DEQ is supportive of the proposed analytical parameters as shown in Table 3; however, DEQ recommends additional analytes are evaluated based on the historical use of the property.
 - a. Prior to the site's development as an automobile salvage yard, the site appears to have been used for residential or agricultural purposes. DEQ recommends analyzing soil samples for organochlorine pesticides using Environmental Protection Agency (EPA) method 8081 to assess for potential contamination from historical agricultural use.
 - b. Based on the site's history of dismantling vehicles, DEQ recommends analyzing for Resource Conservation and Recovery Act metals (RCRA 8: arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver) as well as copper, or please provide discussion regarding why cadmium, chromium, and lead are the only metals of concern at the site.
 - c. Please analyze polychlorinated biphenyls (PCBs) in all soil samples.
 - d. DEQ appreciates the inclusion of method NWTPH-Gx and NWTPH-Dx for discrete soil and groundwater samples. These methods do not need to be applied to ISM samples. However, because generic risk-based concentrations (RBCs) for heavy oil-range

petroleum hydrocarbons have not been established, DEQ suggests analyzing the soil sample with the highest detection of heavy oil-range petroleum hydrocarbon concentrations for extractable petroleum hydrocarbons and volatile petroleum hydrocarbons (EPH/VPH) to facilitate the calculations of site-specific risk-based concentrations for heavy oil-range hydrocarbons.

- e. All groundwater samples should be analyzed for total and dissolved metals. DEQ assumes a 0.45-micron filter will be used to field filter groundwater samples.
- 8) DEQ appreciates the willingness to conduct additional soil sampling to investigate the potential pathway to the stormwater ditch known as Ferrous-Slough. DEQ assumes the test pit locations are situated at low elevation spots where stormwater is likely to flow into Ferrous-Slough and/or accumulate during rain events. If ISM is not used, a minimum of a 5-point composite soil sample should be collected at each test pit; analytical analysis should follow DEQ's 2020 *Decision Unit Characterization, Section 3.3. Conventional Composite Sampling Guidance*.
- 9) In the investigation report, please compare analytical results to:
 - a. Whitaker Slough Upland Source Control soil screening levels, available at <https://www.oregon.gov/deq/Hazards-and-Cleanup/Documents/csWhitakerSloughSLVs.pdf>
 - b. Groundwater results to ecological screening levels
 - c. Relevant human health risk-based concentration screening levels

DEQ appreciates the opportunity to review the Expanded Baseline Investigation Work Plan. Please contact me by phone (503) 926-2257 or email (rebecca.digiustino@deq.oregon.gov) if you have questions.

Sincerely,



Rebecca Digiustino
Project Manager
Northwest Region Cleanup Program

cc: Tish Moll, Property Owner (mydoghuck@yahoo.com)
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ECSI File No. 6484