Oregon
Tina Kotek, Governor

Department of Environmental Quality
Northwest Region
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5696
FAX (503) 229-6124
TTY 711

March XX, 2024

Tim Fastabend
Astoria Marine Construction Company
92134 Front Road
Astoria, OR 97103

sent via e-mail: walluski@charter.net

DRAFT for Public Comment

RE: Conditional No Further Action Determination
Astoria Marine Construction Company
92134 Front Road
Astoria, OR
ECSI #1898

Dear Mr. Fastabend:

The Oregon Department of Environmental Quality (DEQ) reviewed the available information for the above referenced property (the "Site"), including a January 25, 2024 report entitled *AMCCO Remedial Action Construction Certification Report* prepared by Maul Foster and Alongi. The Site is comprised of Clatsop County tax lots 81025DD00800, 81025DD00900, 81025DD01000 and 81025DA05000. DEQ has determined that remedial action to address environmental contamination at the Site is complete, and no further action is required, with conditions. This determination is based on the DEQ regulations and the facts as we now understand them including, but not limited to the following:

- AMCCO was founded in 1924 to manufacture and repair wooden-hulled fishing and ferry boats, tugboats and yachts. During World War II, the shipyard added larger shipways and expanded operations for construction of military vessels. In the 1960s, work for the U.S. Navy decreased and operations transitioned to fishing and tugboat repair.
- The United States Environmental Protection Agency (EPA) completed a preliminary assessment (PA) in 1999 and concluded that no further investigation under the Superfund program was anticipated. The EPA conducted additional Site Inspections (SI) in 2008 and 2009. In March 2011 EPA proposed the Site for inclusion on EPA's Superfund National Priorities List. In September 2012, EPA deferred the Site listing and transferred site management to DEQ.
- AMCCO entered into a Consent Order with DEQ in August 2012. AMCCO contractors completed a remedial investigation/feasibility study (RI/FS) in 2015.
- Upland soil contamination is related to burn pits, debris piles, spent sand blast grit storage areas, former above ground storage tanks, and the transformer area located in the southeast corner of the site. Hotspots were identified for arsenic in the former burn pit area on the levee in the NW corner of the site, elevated petroleum and PAHS near the transformer area, and PCBs at former AST locations.
- Sediment contamination is a result of overwater activities in former shop areas, and ship maintenance activities in the marine ways. Concentrations of metals, tri-butyl tin (TBT), PCBs and dioxin/furans were above ecological and human health spot concentrations. Hot spot areas for the Lewis and Clark River were identified along the shoreline downslope from the burn pit area on the levee, around in the near-shore marine ways, and the eastern debris pile below the workshop in Jeffers Slough.
- The primary contaminants in Site soil and sediment are metals, TBT, dioxin/furans, petroleum, polycyclic aromatic hydrocarbons (PAHs) and polychlorinated biphenyls (PCBs). Contaminants were detected in groundwater below levels of concern.
- DEQ selected a remedial alternative as documented in its 2017 Record of Decision. AMCCO completed the remedial action under a consent judgment with DEQ. The most contaminated

upland soil and in-water sediment was excavated and removed from the site. Remaining upland soil was capped in place. Remaining sediment contamination was covered with a layer of clean imported sand.

- Residual upland soil contamination includes chromium, dioxin/furans and PCB above cleanup levels, and hotspot concentrations of arsenic and lead in the burn pit area. These areas have been capped with clean sand to prevent direct contact and erosion. Hotspot levels of lead and PCBs remain in sediment and capped with at least 4 feet of clean sand.
- The Site is zoned Marine Industrial. Properties immediately to the north and east are zoned Rural Community Residential and are used for residential purposes. Future residential use at the Site is not reasonably likely. The facility is located on the relatively flat floodplain of the Lewis and Clark River in the lower portion of the Youngs Bay Watershed.
  about 1 mile upstream from Youngs Bay. Potential ecological receptors in aquatic areas include aquatic plants, birds, mammals, sediment dwellers and fish. Potential upland eco-receptors include terrestrial plants, invertebrates, birds, and mammals.
- Shallow site groundwater has not been used historically and is not being used for any purpose. No chemicals of potential concern were identified in groundwater exceeding human health or ecological exposure scenarios. Potable water at the site is provided by the Youngs River, Lewis & Clark Water District. The current and future reasonably likely beneficial use of shallow groundwater is recharge to surface water. Surface water currently is not used or reasonably likely to be used near the site for drinking water or industrial uses given its brackish nature. Surface water beneficial uses include aquatic habitat, recreation, and aesthetic uses.
- The upland cap prevents direct contact by site workers with residual contamination and addresses ecological risk as a source control measure. Sediment hotspots were addressed to the extent practical through removal. All areas of residual contamination were capped with clean sand to hasten natural recovery. Upland soil and in-water sediment caps will be monitored to ensure they continue to effectively address residual contamination.
- DEQ held a public comment period in February 2024 to announce its proposal to issue a Certification of Completion and Conditional No Further Action determination. [UPDATE WITH COMMENTS]
- Future requirements for inspection and maintenance of the upland cap, and implementation of contaminated media plan during any intrusive activities, is the responsibility of AMCCO and are memorialized in an Easement and Equitable Servitudes recorded on the property deed on XXXX, 2024. DEQ will perform long-term monitoring and maintenance of the sediment caps using DEQ orphan program funds.

Based on the available information, conditions at the Site are currently protective of public health and the environment in accordance with Oregon environmental cleanup law, ORS 465.200 et seq. The Site requires no further action unless new or previously undisclosed information becomes available, or there are changes in Site development or land and water uses, or more contamination is discovered. DEQ has updated the Environmental Cleanup Site Information System (ECSI) database to reflect this decision. Site information and reports supporting this No Further Action decision can be viewed at:
AMCCO Documents

DEQ recommends keeping a copy of all the documentation associated with this evaluation with the permanent facility records. If you have any questions, please Mark Pugh at 503 229-5587 or mark.pugh@deq.oregon.gov.

Sincerely,

Kevin Parrett, Cleanup Manager
Northwest Region Cleanup Program

e-copy: Carson Bowler
Cem Gokcora, MFA
Chris Rhea, GSI