Contaminated Media Management Plan

205 Auto Salvage Site, 5605 NE 105th Avenue, Portland, Oregon

Prepared for:

205 Real Estate Inc.

January 3, 2024
Project No. M0106.30.001

Prepared by:

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MAUL FOSTER ALONGI

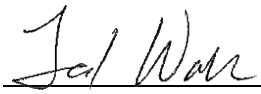
Contaminated Media Management Plan

205 Auto Salvage Site, 5605 NE 105th Avenue, Portland, Oregon

The material and data in this plan were prepared under the supervision and direction of the undersigned.

Maul Foster & Alongi, Inc.

Dana Domenighini
Project Environmental Scientist



Ted Wall, PE
Vice President

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Abbreviations

bgs	below ground surface
CFR	Code of Federal Regulations
CMMP	contaminated media management plan
COC	contaminant of concern
DEQ	Oregon Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HASP	health and safety plan
HAZWOPER	hazardous waste operations and emergency response
MFA	Maul Foster & Alongi, Inc.
OAR	Oregon Administrative Rule
OSHA	Federal Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
RBC	risk-based concentration
the Site	205 Auto Salvage Site, 5605 NE 105th Avenue, Portland, Oregon
TCLP	toxicity characteristic leaching procedure

1 Introduction

Maul Foster & Alongi, Inc. (MFA) has prepared this contaminated media management plan (CMMP) on behalf of 205 Real Estate Inc., for the 205 Auto Salvage site located at 5605 NE 105th Avenue in Portland, Oregon (the Site) (see Figure 1-1). This CMMP was prepared for the management of potentially contaminated media that may be encountered during subsurface activities at the Site.

1.1 Site Description and History

The Site is located in section 15, township 1 north, range 2 east of the Willamette Meridian in Portland, Oregon. The 4.21-acre Site comprises tax lots 1900 and 2000 and is currently occupied by two industrial/warehouse buildings and two auxiliary structures (see Figure 1-2). Since the 1970s, an auto salvage facility, known as 205 Auto Salvage, has operated on the Site. 205 Auto Salvage discontinued business in June 2022.

1.2 Project Background

In March 2023, Evren Northwest, Inc. conducted an environmental site assessment on the Site which identified an area of elevated concentrations of arsenic and polychlorinated biphenyls (PCBs) at 0.5 feet below ground surface (bgs) within a stormwater swale/gully and retention pond located along the western property boundary (ENW 2023). To further define the extent of impacts in the stormwater swale/gully and retention pond, MFA collected additional soil samples in July and August 2023 (MFA 2023a). MFA delineated seven grid cells for composite soil sampling within the stormwater retention system. Results of the investigation identified concentrations of arsenic above the Oregon Department of Environmental Quality (DEQ) direct contact risk-based concentrations (RBCs) for occupational and construction workers and DEQ background metal levels, as well as concentrations of PCBs above a Site-established cleanup level of 0.56 milligram per kilogram up to a depth of one foot bgs.

In December 2023, MFA completed soil removal in the stormwater retention system to address the elevated concentrations of arsenic and PCBs (MFA 2023b). The excavation was completed to a depth of two feet bgs, and a total of approximately 175 tons of soil was excavated and disposed of offsite.[1] Leave surface samples were collected following the soil removal and identified concentrations of arsenic above the DEQ-established background metals level, direct contact RBC for occupational and construction workers, and/or PCBs above the Site-established cleanup level of 0.56 milligrams per kilogram within the excavation area.

Following the soil removal, a geotextile fabric was placed as a demarcation along the entire base of the excavation extent and the excavation was backfilled with clean import material, which serves as a cap to prevent contact with residual impacted soil detected in the base of the excavation.

[1] In addition to the stormwater swale/gully and retention pond, soil was excavated at a small "suspect infiltration feature." The leave surface sample showed no applicable RBC exceedances, so the area does not fall under the obligations of this CMMP.

In addition, during the soil removal, water from an adjacent pond began infiltrating under the fence line and accumulating in the excavation area. To prevent this infiltration from increasing and to maintain the integrity of the adjacent pond (i.e., avoid soil collapse and pond discharge onto the Site), MFA adjusted the originally planned excavation boundaries to provide a three- to four-foot-wide buffer of exposed soil between the fence line and the western excavation boundary.

Data tables presenting the laboratory analytical results and regulatory screening for samples collected during MFA's July and August 2023 site investigation and December 2023 remedial action are included in Appendix A.[2]

1.3 Contaminated Media Management Plan Purpose and Distribution

The purpose of this CMMP is to provide guidelines for assessing and managing contaminated media (soil and groundwater) that may be present in the restricted areas as described in Section 2.2. The restricted areas may be encountered during future subsurface activities (e.g., utility work, construction, redevelopment) on the Site. This CMMP identifies contaminants of concern (COCs), excavation protocols, soil- and groundwater-handling procedures, and waste characterization and disposal requirements.

The guidelines and procedures outlined in this CMMP are to be followed during any subsurface-soil-disturbing activities within both restricted areas.

This CMMP may be reviewed and amended as necessary in the future to address discrete soil-disturbing activities, to support more comprehensive redevelopment concepts, or to address other activities for which the scope is not currently known. Amendments to this CMMP will require DEQ approval.

The Site owner will provide this CMMP to all designers and contractors performing activities on the Site where disturbance and/or direct contact with contaminated soil or groundwater could occur. The Site owner will be responsible for ensuring that all contaminated-media-handling activities have been properly planned and that additional investigations are completed as necessary before a project is implemented.

[2] Note that the entirety of grid cells GC03 and GC05 through GC07 were removed during the December 2023 excavation activities, and, therefore, the sample results for GC03 and GC05 through GC07 in Table 2 in Appendix A are not applicable to this CMMP. In addition, sample IF01 Composite in Table 4-1 in Appendix A is not from the stormwater retention system excavation and, therefore, is not applicable to this CMMP.

2 Contaminants of Concern Distribution

2.1 Site Contaminants

COCs are chemicals confirmed to be present in site media at concentrations that exceed or could exceed relevant RBCs for current or reasonably likely future human exposure scenarios. COCs include PCBs and arsenic.

2.2 Nature and Extent of Contamination

As described above, concentrations of chemicals above applicable screening criteria have been identified in soil along the western boundary of the Site. Specifically, the nature and extent of known contamination above applicable screening criteria is as follows (see Figure 1-2):

- All soil underlying the demarcation layer (at approximately two feet bgs) within the boundaries of the excavation (referred to as the Gravel Cap)
- The three- to four-foot-wide strip of exposed soil that remains along the western boundary of the excavation (referred to as the Soil Buffer)

These areas are considered “restricted areas” to which this CMMP applies unless additional information is acquired that shows otherwise.

The residual contamination above applicable screening levels is currently isolated and not accessible in the Gravel Cap area. Additionally, while the soil in the Soil Buffer is not capped, the area is small and its use as a stormwater retention pond makes it unlikely receptors will come in contact with this soil. Further, the Site is currently inactive as operations ceased in 2022, and as a result no receptors are currently coming in contact with the soil in the Soil Buffer. Therefore, the risk associated with pre-redevelopment use (i.e., current conditions of the Site) is within acceptable limits, provided the Site remains inactive, the cap is maintained, and residual contamination is not disturbed. If these conditions substantially change, the Site owner will follow the guidelines and protocols outlined in this CMMP, and this CMMP may need to be reviewed and amended as necessary in the future to address mitigating risk to potential receptors.

3 Protocols for Soil-Disturbing Activities

The following protocols shall be followed for any activities that penetrate the ground surface and result in disturbance of or exposure to site soil in the Soil Buffer or soil beneath the demarcation layer in the Gravel Cap areas. The protocols shall apply to all individuals in the construction areas during soil-disturbing activities. The procedures listed in this section may be superseded by the requirements of a project-specific health and safety plan (HASP), if such a plan has been prepared following the guidelines described in Section 3.3.

3.1 Description of Soil-Disturbing Activities

It is our understanding that the sale of the Site is pending along with the sale of the adjacent property to the west (to the same buyer). The details of future redevelopment activities are currently unknown; however, placement of utilities and/or construction of building foundations would likely require excavation. In addition, it is presumed that redevelopment will involve holistic reconfiguration of the drainage systems for the Site and the west-adjacent property, which may result in the removal or alteration of the Soil Buffer and/or Gravel Cap areas. Any activities that disturb soils in the Soil Buffer or beneath the demarcation layer in the Gravel Cap will be conducted in accordance with this CMMP and will be performed by qualified personnel as described in Section 3.2. All soils requiring excavation must be characterized and managed under the protocols defined in Section 4.

Additionally, because of residual contamination on the Site, it is required that the cap be maintained in the Gravel Cap area. Currently, the area is covered by a two-foot gravel cap overlying a demarcation layer, and therefore, there is no current risk of exposure. If the cap is removed, either through breaches that compromise the integrity of a portion of the cap or removal of the entire cap, during future subsurface activities, it will be necessary to replace it with a cap[3] unless residual soil contamination is removed to acceptable levels. In addition, in the event the demarcation layer is removed or damaged during future redevelopment or excavation activities, the Site owner is responsible for its repair or replacement.

3.2 Qualified Personnel

All on-site activities during which workers will come into direct contact with known or suspected contaminated soil or groundwater must be conducted by "qualified personnel," as defined below. Each worker must be familiar with the site HASP, which is designed to identify, evaluate, and control safety and health hazards, and to provide protocols for emergency response.

As required by the federal Occupational Safety and Health Administration (OSHA) regulations (29 Code of Federal Regulations [CFR] § 1910.120 and § 1926.65), workers in any portion of the Site that has been designated as a restricted area and any workers who will contact known contaminated soils must be qualified personnel—i.e., must have completed 40 hours of OSHA-approved hazardous waste operations and emergency response (HAZWOPER) training.

For the remainder of the Site, i.e., areas that are not designated as restricted, at a minimum, managers and supervisors directly responsible for work will have completed the 40-hour HAZWOPER training. If contamination is observed during ground-disturbing activities, soil will require stabilization, segregation, and analysis under the direction of these managers/supervisors.

3.3 Health and Safety

All activities that have the potential to disturb contaminated site soil or groundwater in the restricted areas shall be completed with appropriate protections defined by a project-specific HASP. The contractor is required to prepare a HASP and provide it to the Site owner before work begins. The HASP will ensure compliance with all applicable worker protection regulatory requirements, including

[3] The cap may be similar to what is currently present, a hard surface (building, asphalt, concrete, etc.), or other materials as approved by DEQ.

29 CFR 1910.120, the HAZWOPER rule promulgated by OSHA. The final HASP will be available on site at all times and must be produced for review, on request, by the Site owner or DEQ.

The HASP shall, at a minimum, set forth requirements and protections for working in areas of chemical contamination, and shall address the following subject matter:

- COCs/site background
- Personal protective equipment
- Personal hygiene/decontamination protocols
- Requirements for medical surveillance
- Identification of physical and chemical hazards
- Hazard communication and site control

During activities that disturb potentially contaminated soil or groundwater, the contractor will be fully responsible for the implementation of its site-specific HASP. HAZWOPER certifications are required only for handling soils with visual or olfactory hydrocarbon or other chemical contamination encountered during the course of work. If contaminated soil is encountered, all excavation activities will be conducted according to the OSHA of 1970 (29 U.S. Code Sec. 651 et seq.) by HAZWOPER-certified workers under the direction of a HAZWOPER-certified supervisor.

3.4 Notification

The Site owner must notify the Northwest Region DEQ Cleanup department at least seven days before starting any project that will disturb soils beneath the demarcation layer and in the Soil Buffer. The notification must include a general description of the activity, the location of the activity, the project schedule, and the anticipated volumes of contaminated soil to be managed. The notification will describe soil characterization procedures, disposal and/or storage locations of any excavated soil (i.e., whether it will be managed on site or transported off site), and the intended disposal methods.

The Site owner must notify DEQ within 48 hours upon discovery or observation of previously unknown contamination during site subsurface-disturbing activities on the Site.

3.5 Recordkeeping and Reporting

Following the completion of each project involving contaminated-soil disturbance, the Site owner will document the work, including, as applicable:

- Activities that resulted in management of contaminated soil, including excavation and on-site disposal locations
- Estimated quantities of contaminated soil managed
- Results of soil sampling and analysis, if any
- Volumes and locations of soil disposed of off site, and bills of lading and/or hazardous waste manifests

- Photographic documentation and mapping (including surveyed excavation limits for projects involving soil excavation) to show the location of the disturbed area(s) and cap construction
- Survey mapping of soils managed on site

The property owner must permanently maintain the records and provide them to any subsequent property owner.

4 Excavated Soil Management

Given the expected long-term use of this CMMP (and future versions), during planning for activities involving subsurface activities, the responsible party (the Site owner) will review underlying risk criteria (e.g., DEQ RBCs) and waste-handling and disposal regulations to ensure that procedures outlined in this CMMP meet statutory requirements.

4.1 Identification and Response

Although the probability is expected to be low due to known conditions in the restricted areas, the potential exists to encounter unknown contaminated media in these areas during subsurface-disturbing activities. Soil with the following characteristics should be reported to the Site owner immediately:

- Unusual or chemical-like odor
- Unusual staining
- The presence of light nonaqueous-phase liquid (i.e., floating petroleum product)
- Sheens

If suspected contaminated media are encountered, the contractors should:

- Stop work in the area
- Immediately notify the Site owner
- Secure the area until notified by the Site owner that work may continue
- Remove staff from the area; the contractor may continue work on unaffected areas

Suspected contaminated media that has been excavated will be characterized, stockpiled, and handled per the following sections.

4.2 Waste Characterization

Soil requiring excavation may contain hazardous substances that are regulated under federal or State of Oregon solid or hazardous waste rules. Consequently, the soil must be adequately characterized, as described below, before its removal from the Site to ensure compliance with these regulations. Waste characterization for soils beneath the demarcation layer in the Gravel Cap and

soils in the Soil Buffer may rely on existing data (see Appendix A for previous data collected). Note however, that receiving waste facilities may require additional characterization sampling.

For both restricted areas, field screening methods, including visual, olfactory, sheen tests, and the use of a properly calibrated photoionization detector, will be used during excavation activities to identify potentially contaminated soil that was previously undiscovered. Should new soil contamination (actual or suspected) be discovered, characterization will be required. The specific sampling and analysis approach should be established and approved by DEQ and the planned disposal facility to ensure that excavated soils are adequately characterized for waste profiling and disposal. Based on knowledge of historical site uses and previously confirmed contaminant types and concentrations, characterization will include the following constituents: PCBs and arsenic.

For previously undiscovered/potentially contaminated soil, the sampling program will be established as follows:

- Excavated soils should be sampled in maximum 100-cubic-yard increments using a five-point composite sampling approach
- Each composite sample should be analyzed for:
  - PCBs by U.S. Environmental Protection Agency (EPA) Method 8082
  - Arsenic by EPA Method 6020
- The analytical results should be compared to the criteria under CFR 40 261.24. Specifically, the "20 times rule" should be applied to determine if any of the tested compounds could fail the toxicity characteristic leaching procedure (TCLP) test, and if so, TCLP testing should be conducted for those compounds. The TCLP regulatory limit for arsenic is 5 milligrams per liter.

If soil does not exhibit the toxicity characteristic and does not otherwise contain residue defined in Oregon Administrative Rules (OAR) 340-101-0033(2),[4] it can be managed and disposed of as solid waste. If contaminant levels meet DEQ clean fill criteria (DEQ 2019), the soil can be used without restrictions.

Additionally, if contaminant levels meet applicable DEQ RBCs for the Site, the soil may be used as fill on the Site after prior approval from DEQ. Other requirements such as placement of the soil above seasonal high groundwater may also apply.

4.3 Screening/Handling

Mechanical screening methods, if conducted in a manner that minimizes dust generation, may be employed to separate contaminated soil from inert, oversized material (e.g., rocks and concrete). Contaminated soil must be managed as described in Section 4.4, but oversized rocks and concrete can be used for on-site fill or crushed and used as aggregate. Other oversized debris (wood, metal, solid waste) will be transported off site and disposed of appropriately. If any on-site or off-site recycling options are identified for other inert materials during final design or construction, the Site owner will coordinate with and seek approval from DEQ before completing such recycling.

[4] OAR 340-101-0033(2) does not apply unless specific evidence is discovered regarding the presence of discarded commercial chemical products, off-specification species, container residues and residues thereof meeting the criteria specified in OAR 340-101-0033(2) and 40 CFR 261.33(e) and (f).

4.4 Stockpiling

Any soil excavated in the restricted areas that requires temporary stockpiling shall be managed in a manner that minimizes erosion and contact with stormwater runoff, prevents placement near structures, and avoids workers' direct contact with the soil. Temporary soil stockpiles shall be placed on an impervious surface or on 10 mil plastic sheeting (or similar material). The stockpile shall be covered with plastic sheeting at the end of each workday to prevent erosion, dust generation, and direct contact by humans. The plastic sheeting that covers the pile must be regularly inspected to ensure that it remains functional and protective of human health and the environment. In the event of precipitation, berms should be constructed to restrict runoff from the stockpiles. Temporary stockpiles of contaminated soil must be properly disposed of off site within 180 days of completion of excavation work, unless written approval is obtained from DEQ for an alternative schedule, or with DEQ's permission, contaminated soils meeting applicable RBCs may be placed in the excavation and covered with an engineered surface. If temporary stockpiles are to remain on site for more than 30 days, a Solid Waste Letter Authorization permit is required.

Following the stockpile removal, the area beneath the separation material shall be inspected, and any remaining stockpile soil shall be scraped, swept, or otherwise removed and properly disposed of.

4.5 Excavated Soil Disposition

All soil excavated from the Soil Buffer or beneath the demarcation layer in the Gravel Cap should be assumed to contain hazardous constituents above acceptable risk levels unless and until sampling and analysis as described in this CMMP demonstrate otherwise. Contaminated soil must be managed consistent with one of the methods described below.

4.5.1 Placement on Site

Contaminated soil shall not be redistributed across the Site without prior DEQ approval. In addition, if contaminated soil is to be treated on site, a Solid Waste Letter Authorization permit may be required.

4.5.2 Off-Site Disposal

Soil that is to be disposed of off site and that is not a Toxic Substances Control Act-regulated waste or Resource Conservation and Recovery Act (RCRA)-regulated hazardous waste can be taken to a RCRA Subtitle D landfill.

Soil that is to be disposed of off site and that exhibits the characteristics of hazardous waste will be disposed of as hazardous waste at a RCRA Subtitle C landfill unless it is treated (either on site or off site) to render it nonhazardous. Management of soil classified as hazardous waste under either the federal or state hazardous waste regulations must comply with current regulations, and the party responsible for generation of the hazardous waste will consult with DEQ. Regulations will be reviewed and standard waste profiling and disposal contracting processes will be followed to ensure regulatory compliance.

Off-site management of soil will adhere to the following procedures:

- Obtain a Solid Waste Letter Authorization permit from DEQ if contaminated soil is to be treated off site, if required

- Obtain waste acceptance and disposal agreements from the landfill for the soil
- Minimize spillage of soil onto the ground during truck loading. Scrape, clean up, and dispose of any spilled soil
- Remove excess soil from truck and truck tires prior to leaving the soil-loading area
- Ensure that there are no free liquids in the soil contained in the truck
- Transport in accordance with applicable Department of Transportation regulations

5 Groundwater Management

If groundwater requires removal during excavation and/or other subsurface-disturbing activities in the restricted areas, it will require characterization and management as outlined below. As with soil, RBCs and waste-handling and disposal requirements applicable at the time of the planned work should be reviewed to ensure compliance.

5.1 Identification and Response

The potential exists to encounter unknown contaminated media in the restricted areas during subsurface-disturbing activities. Groundwater with the following characteristics should be reported to the Site owner immediately:

- Unusual or chemical-like odor
- The presence of light nonaqueous-phase liquid (i.e., floating petroleum product) or petroleum sheen

If suspected contaminated groundwater is encountered, the Site owner should follow the procedures in Section 4.1, as applicable.

5.2 Waste Characterization

Groundwater that requires removal or management must be characterized. Unless 1) inconsequential, or 2) conditions require immediate action, groundwater shall not be removed or managed without prior approval from DEQ. The specific sampling and analysis approach should be established in consultation with DEQ and the planned disposal facility to ensure that groundwater is adequately characterized for waste profiling and disposal. Generally, based on knowledge of historical uses at the Site and previously confirmed contaminant types and concentrations (in soils), characterization likely will include:

- PCBs by EPA Method 8082
- Arsenic by EPA Method 6020

5.3 Storage and Discharge

Impacted groundwater that requires removal during subsurface-disturbing activities in the restricted areas will be stored on site (e.g., in baker tanks) pending characterization data. Groundwater shall not be directly discharged from the Site until it is characterized, and the discharge is approved by DEQ. In addition, the party performing the work must also obtain permits and/or approvals from the appropriate municipal authority or publicly owned treatment works prior to discharging to the storm sewer or sanitary sewer, respectively.

References

DEQ. 2019. *Clean Fill Determinations.* Oregon Department of Environmental Quality. February 21.

ENW. 2023. *Draft Focused Phase II Environmental Site Assessment, Industrial Property, 5605-5621 NE 105th Avenue, Portland, Oregon.* Prepared for Blackstone Consulting. Evren Northwest, Inc. May 19.

MFA. 2023a. Dana Domenighini and Ted Wall, Maul Foster & Alongi, Inc. *205 Auto Salvage, 5605 NE 105th Avenue, Portland, Oregon—Site Investigation.* Letter to Garry Gossett, 205 Real Estate, Inc. December 19.

MFA. 2023b. *Remedial Action Completion Report, 205 Auto Salvage, 5605 NE 105th Avenue, Portland, Oregon.* Prepared for 205 Real Estate Inc. Maul Foster & Alongi, Inc.: Portland, OR. December 22.

Limitations

The services undertaken in completing this plan were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This plan is solely for the use and information of our client unless otherwise noted. Any reliance on this plan by a third party is at such party's sole risk.

Procedures contained in this plan apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this document.

Figures

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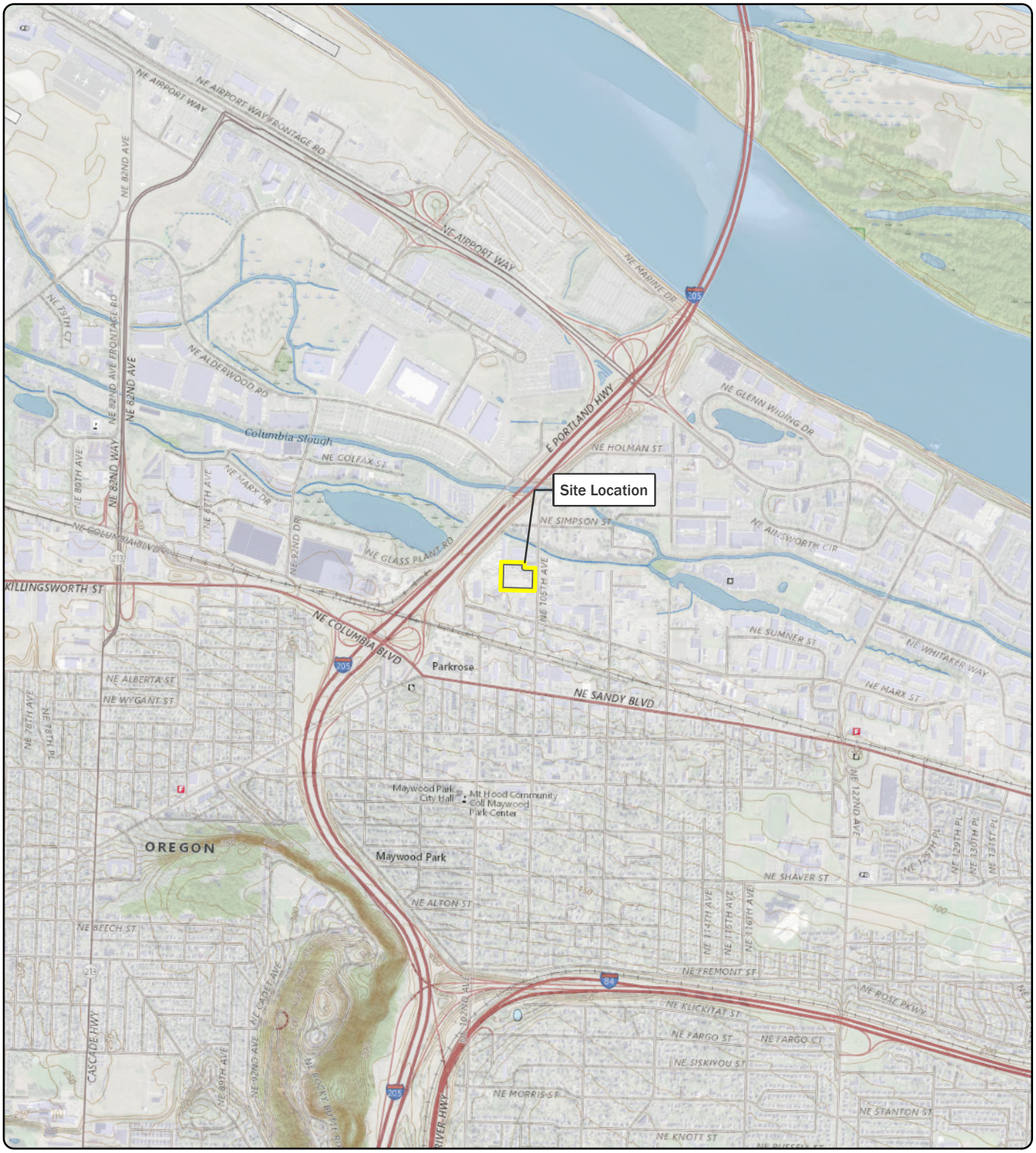

Notes
U.S. Geological Survey 7.5-minute topographic quadrangle (2020): Mount Tabor.
Township 1 north, range 2 east, section 15.

Data Source
Property boundary obtained from Oregon Metro (2023).

Legend

Site boundary

Figure 1-1
Site Location

5605 NE 105th Ave
Portland, OR

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0 1,000 2,000
Feet

Path: X:\0106.30\Pro\M0106_30_001.aprx\Fig 1-1 Site Location
Print Date: 12/20/2023
Reviewed By:
Produced By: jelstrott
Project: M0106.30.001

Figure 1-2
Site Features and Restricted Areas

5605 NE 105th Ave
Portland, Oregon

Legend

- Gravel Cap
- Soil Buffer
- Site Boundary

Note
GC = gravel cap.

0 50
Feet

Data Sources
Aerial photograph obtained from City of Portland (2022).

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Path: X:\0106.30\Pro\M0106_30_001.aprx\Fig1-2 Site Features and Restricted Areas
Project: M0106.30.001 Produced By: sturner Reviewed By: ddorneiglun1 Print Date: 1/3/2024

Appendix A

Previous Investigation Results

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Note: Table 2 presents initial analytical results collected prior to the December 2023 excavation activities. For the purposes of the CMMP, the analytical results for grid cells GC01, GC02, and GC04 are representative concentrations for the Soil Buffer only. Analytical results for grid cells GC03 and GC05 through GC07 presented in Table 2 were removed during excavation activities and are not applicable to the CMMP.

Table 2
Summary of Soil Analytical Results
205 Auto Salvage
Portland, Oregon

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Location:	RBC, Soil, Soil Ingestion, Dermal Contact, and Inhalation[1]			Oregon Background Metals, Portland Basin[2]	Site-Specific Cleanup Level[3]	EPA Hazardous Waste Regulatory Limit[a]	GC01			GC02		GC03		GC04	
Sample Name:							GC01-S-0.5	GC01-S-0.5-DUP	GC01-S-1.0	GC02-S-0.5	GC02-S-1.0	GC03-S-0.5	GC03-S-1.0	GC04-S-0.5	GC04-S-1.0
Sample Date:	Occ.	Construction Worker	Excavation Worker				07/11/2023	07/11/2023	07/11/2023	07/13/2023	07/13/2023	07/13/2023	07/13/2023	07/13/2023	07/13/2023
Sample Depth (ft bgs):							0.5	0.5	1.0	0.5	1.0	0.5	1.0	0.5	1.0
Total Metals (mg/kg)															
Arsenic	1.9	15	420	8.8	NV	NA	22.8	18.5	26.6	31.1	156	24.6	42.7	24.5	33.2
TCLP Metals (mg/L)															
Arsenic	NV	NV	NV	NV	NV	5.0	--	--	--	--	0.0500 U	--	--	--	--
PCBs (mg/kg)															
Aroclor 1016	NV	NV	NV	NV	NV	NV	0.00581 U	0.00571 U	--	0.00559 U	--	0.0258 U	0.0256 U	0.0271 U	0.0542 U
Aroclor 1221	NV	NV	NV	NV	NV	NV	0.00581 U	0.00571 U	--	0.00559 U	--	0.0258 U	0.0256 U	0.0271 U	0.0542 U
Aroclor 1232	NV	NV	NV	NV	NV	NV	0.0116 U	0.00571 U	--	0.00559 U	--	0.0258 U	0.0256 U	0.0271 U	0.0542 U
Aroclor 1242	NV	NV	NV	NV	NV	NV	0.00581 U	0.00571 U	--	0.00559 U	--	0.0258 U	0.0256 U	0.0271 U	0.0542 U
Aroclor 1248	NV	NV	NV	NV	NV	NV	0.00581 U	0.00571 U	--	0.00559 U	--	0.0258 U	0.0256 U	0.0271 U	0.0542 U
Aroclor 1254	NV	NV	NV	NV	NV	NV	0.0371 J	0.0818 J	--	0.301 J	--	0.853	1.03	1.78	3.31 J
Aroclor 1260	NV	NV	NV	NV	NV	NV	0.0216 J	0.0308 J	--	0.0376 J	--	0.0258 U	0.0256 U	0.0271 U	0.0542 U
Total PCBs[b]	NA[c]	NA[c]	NA[c]	NV	0.56	NV	0.0587 J	0.113 J	--	0.339 J	--	0.853	1.03	1.78	3.31 J

Note: Table 2 presents initial analytical results collected prior to the December 2023 excavation activities. For the purposes of the CMMP, the analytical results for grid cells GC01, GC02, and GC04 are representative concentrations for the Soil Buffer only. Analytical results for grid cells GC03 and GC05 through GC07 presented in Table 2 were removed during excavation activities and are not applicable to the CMMP.

Table 2
Summary of Soil Analytical Results
205 Auto Salvage
Portland, Oregon

Location:	RBC, Soil, Soil Ingestion, Dermal Contact, and Inhalation[1]			Oregon Background Metals, Portland Basin[2]	Site-Specific Cleanup Level[3]	GC05		GC06		GC07	
Sample Name:						GC05-S-0.5	GC05-S-1.0	GC06-S-0.5	GC06-S-1.0	GC07-S-0.5	GC07-S-1.0
Sample Date:	Occ.	Construction Worker	Excavation Worker			07/13/2023	07/13/2023	08/22/2023	08/22/2023	08/22/2023	08/22/2023
Sample Depth (ft bgs):						0.5	1.0	0.5	1.0	0.5	1.0
Total Metals (mg/kg)											
Arsenic	1.9	15	420	8.8	NV	36.3	49.6	49.4	109	8.72	10.2
TCLP Metals (mg/L)											
Arsenic	NV	NV	NV	NV	NV	--	--	--	0.0500 U	--	--
PCBs (mg/kg)											
Aroclor 1016	NV	NV	NV	NV	NV	0.539 U	0.268 U	0.00538 U	0.00589 U	0.00576 U	0.00620 U
Aroclor 1221	NV	NV	NV	NV	NV	0.539 U	0.268 U	0.00538 U	0.00589 U	0.00576 U	0.00620 U
Aroclor 1232	NV	NV	NV	NV	NV	0.539 U	0.268 U	0.00538 U	0.00589 U	0.00576 U	0.00620 U
Aroclor 1242	NV	NV	NV	NV	NV	0.539 U	0.268 U	0.00538 U	0.00589 U	0.00576 U	0.00620 U
Aroclor 1248	NV	NV	NV	NV	NV	0.539 U	0.268 U	0.00538 U	0.00589 U	0.00576 U	0.00620 U
Aroclor 1254	NV	NV	NV	NV	NV	18.1	9.53	0.163	0.413	0.00878 J	0.00750 J
Aroclor 1260	NV	NV	NV	NV	NV	0.539 U	0.268 U	0.00538 U	0.00589 U	0.00576 U	0.00620 U
Total PCBs[b]	NA[c]	NA[c]	NA[c]	NV	0.56	18.1	9.53	0.163	0.413	0.00878 J	0.00750 J

Note: Table 2 presents initial analytical results collected prior to the December 2023 excavation activities. For the purposes of the CMMP, the analytical results for grid cells GC01, GC02, and GC04 are representative concentrations for the Soil Buffer only. Analytical results for grid cells GC03 and GC05 through GC07 presented in Table 2 were removed during excavation activities and are not applicable to the CMMP.

Table 2
Summary of Soil Analytical Results
205 Auto Salvage
Portland, Oregon

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Notes

Shading (color key below) indicates values that exceed screening criteria; non-detects (U) results were not compared with screening criteria. Where multiple criteria are exceeded, the highest value is shaded.

RBC, Soil, Soil Ingestion, Dermal Contact, and Inhalation, Occupational

RBC, Soil, Soil Ingestion, Dermal Contact, and Inhalation, Construction Worker

Oregon Background Metals Concentrations in Soil, Portland Basin

Site-Specific Screening Criteria

-- = not analyzed.

DEQ = Oregon Department of Environmental Quality.

EPA = U.S. Environmental Protection Agency.

ft bgs = feet below ground surface.

J = result is estimated.

mg/kg = milligrams per kilogram.

mg/L = milligrams per liter.

NA = not applicable.

NV = no value.

Occ. = occupational.

PCB = polychlorinated biphenyl.

RBC = risk-based concentration.

TCLP = toxicity characteristic leaching procedure.

U = result is non-detect at the method detection limit.

[a]Toxicity characteristic regulatory limit from Table 1 of U.S. 40 Code of Federal Regulations part 261.24.

[b]Total PCBs is the sum of all detected PCB Aroclors. Non-detect results are not included in the sum.

[c]A DEQ-approved cleanup level is established for the site; therefore, total PCBs are not screened against the generic DEQ risk-based concentrations.

References

[1]DEQ. 2023. Table: *Risk-Based Concentrations for Individual Chemicals* . Oregon Department of Environmental Quality. June.

[2]DEQ. 2013. *Oregon Background Concentrations for Metals in Soil.* Oregon Department of Environmental Quality. March.

[3]DEQ. 2023. Rebecca Digiustino, Oregon Department of Environmental Quality. *Request for Revised Residual PCB Cleanup Level of 0.56 mg/kg, Auto Salvage 205 (ECSI No. 2087).* Letter to Garry Gossett. City of Portland. June 29.

Note: Table 4-1 presents analytical results for the soil underlying the demarcation layer within the excavation area by grid cell. Analytical results for the suspect infiltration feature presented in this table are not applicable to the CMMP.

Table 4-1
Leave Surface Sample Analytical Results
205 Auto Salvage
Portland, Oregon

Location:	RBC, Soil, Soil Ingestion, Dermal Contact, and Inhalation[1]			Oregon Background Metals, Portland Basin[2]	Site-Specific Cleanup Level[3]	GC01	GC02	GC03	GC04	GC05	GC06	GC07	Infiltration Feature
Sample Name:						GC01 COMPOSITE	GC02 COMPOSITE	GC03 COMPOSITE	GC04 COMPOSITE	GC05 COMPOSITE	GC06 COMPOSITE	GC07 COMPOSITE	IF01 COMPOSITE
Sample Date:	Occupational	Construction Worker	Excavation Worker			12/13/2023	12/13/2023	12/13/2023	12/13/2023	12/13/2023	12/13/2023	12/12/2023	12/13/2023
Sample Depth (ft bgs):						2	2	2	2	2	2	2	2
Total Metals (mg/kg)													
Arsenic	1.9	15	420	8.8	NV	32.9	124	213	43.2	6.25	41.0	21.7	4.23
PCBs (mg/kg)													
Aroclor 1016	NV	NV	NV	NV	NV	0.00551 U	0.00573 U	0.0280 U	0.00567 U	0.0976 U	0.00625 U	0.00513 U	--
Aroclor 1221	NV	NV	NV	NV	NV	0.00551 U	0.00573 U	0.0280 U	0.00567 U	0.0976 U	0.00625 U	0.00513 U	--
Aroclor 1232	NV	NV	NV	NV	NV	0.0110 U	0.00573 U	0.0280 U	0.00567 U	0.0976 U	0.00625 U	0.00513 U	--
Aroclor 1242	NV	NV	NV	NV	NV	0.00551 U	0.00573 U	0.0280 U	0.0186 J	0.0976 U	0.00625 U	0.00513 U	--
Aroclor 1248	NV	NV	NV	NV	NV	0.00551 U	0.00573 U	0.0280 U	0.00567 U	0.0976 U	0.00625 U	0.00513 U	--
Aroclor 1254	NV	NV	NV	NV	NV	0.0477 J	0.670	1.47	0.172 J	4.19	0.0611 J	0.158 J	--
Aroclor 1260	NV	NV	NV	NV	NV	0.00990 J	0.00573 U	0.0280 U	0.0233 J	0.0976 U	0.00773 J	0.0366 J	--
Total PCBs[a]	NA[b]	NA[b]	NA[b]	NV	0.56	0.0576 J	0.670	1.47	0.214 J	4.19	0.0688 J	0.195 J	--

Notes

Shading (color key below) indicates values that exceed screening criteria; non-detects (U) results were not compared with screening criteria. Where multiple criteria are exceeded, results are shaded based on the highest value.

Metals results below background metals criteria were not considered RBC exceedances.

RBC, Soil, Soil Ingestion, Dermal Contact, and Inhalation, Occupational

RBC, Soil, Soil Ingestion, Dermal Contact, and Inhalation, Construction Worker

Oregon Background Metals Concentrations in Soil, Portland Basin

Site-Specific Cleanup Level

-- = not analyzed.

DEQ = Oregon Department of Environmental Quality.

ft bgs = feet below ground surface.

J = result is estimated.

mg/kg = milligrams per kilogram.

NA = not applicable.

NV = no value.

PCB = polychlorinated biphenyl.

RBC = risk-based concentration.

U = result is non-detect at the laboratory detection limit.

[a]Total PCBs is the sum of all detected PCB Aroclors. Non-detect results are not included in the sum.

[b]A DEQ-approved cleanup level is established for the site; therefore, total PCBs are not screened against the generic DEQ RBCs.

References

[1]DEQ. 2023. Table: *Risk-Based Concentrations for Individual Chemicals* . Oregon Department of Environmental Quality. June.

[2]DEQ. 2013. *Oregon Background Concentrations for Metals in Soil.* Oregon Department of Environmental Quality. March.

[3]DEQ. 2023. Rebecca Digiustino, Oregon Department of Environmental Quality. *Request for Revised Residual PCB Cleanup Level of 0.56 mg/kg, Auto Salvage 205 (ECSI No. 2087).* Letter to Garry Gossett. City of Portland. June 29.