



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

July 6, 2023

via electronic delivery

Dave Johnson
PO Box 83706
Portland, OR 97293

Re: Focused Removal Action
PCB Areawide – N Bradford St. ROW, Portland, Oregon
Peninsula Iron Works, ECSI ID# 6480

Dear Dave Johnson:

The Oregon Department of Environmental Quality (DEQ) reviewed the June 20, 2023 Focused Removal Action Work Plan (Work Plan) prepared by Evren Northwest, on behalf of Peninsula Iron Works (PIW). The Work Plan describes the proposed removal action of soil contaminated with polychlorinated biphenyls (PCBs) around the PIW Facility, Building 2, at 6618 North Alta Avenue near North Bradford Street in Portland, Oregon (ECSI #6480). The Work Plan also discusses additional sampling to occur in Decision Unit (DU) 10 and presents a project and reporting schedule.

Please incorporate DEQ's comments below and submit a final work plan.

General Comments

1. Please note that it is PIW's responsibility to ensure this work complies with the Toxic Substance Control Act (<https://www.epa.gov/pcbs/managing-remediation-waste-polychlorinated-biphenyls-pcbs-cleanups>). If you have any questions, contact Brett Feldhahn, Environmental Protection Agency's Region 10 PCB Coordinator (Feldhahn.brett@epa.gov).

Specific Comments

1. Page 5. Incremental Sampling Methodology. The sampling method should be consistent with past ISM samples, such as PIW's approved 2022 Work Plan for Focused Surface Soil Investigation. The sampling method should use systematic random sampling for determining the first increment location in a sampling grid, and this location relative to the grid should be repeated for all other grids. Similarly, DEQ recommends cylindrical corers, augers, ISM tools, or drills and discourages trowels or shovels to reduce sample bias in particle size. Also, please specify that the large amounts of wood debris and rocks will be removed prior to selecting the equal mass increment and clarify if the sample depth is 0 to 2 inches.
2. Page 7. Laboratory Sub-Sampling and Compositing. The standard operating procedure provided states only that mixing of soil samples will occur when multiple sub samples are received in separate containers. Please clarify when and how the ISM samples collected in the one 1-gallon glass container (per decision unit) will be homogenized.

3. Page 8-9. Focused Soil Removal.
 - a. The soil removal should be briefly described in words, as it is difficult to understand exactly where soil will be removed versus capped in Table 3-5. For example, when will confirmation samples above 0.52 mg/kg in EDU1 result in further soil removal versus capping?
 - b. Please clarify how site workers will be informed about and protected from the elevated concentrations of PCBs that may be encountered during excavation.
4. Page 10. Confirmation Sampling.
 - a. Provide information about the number and locations of the confirmation samples proposed for each decision unit following soil removal (e.g., does the “final limits of excavation areas” include the sidewalls of the excavation? Will samples be evenly spaced along the length of each decision unit?)
5. Page 10. Placement of Demarcation Fabric and Excavation Backfill.
 - a. The demarcation fabric should be a highly visible color, such as orange.
 - b. Please clarify how far the fabric will extend beyond the area above 0.52 mg/kg.
 - c. Provide the specifications of the backfill material. Note that where applicable, please confirm with access agreement or permit requirements.
6. Figure 6. Removal Areas.
 - a. The area between EDU02 and DU-10 needs to be addressed. Clarify if this area will be included with EDU02 in this Work Plan or with DU-10 in the Supplement to Work Plan.
 - b. Section 2.2 Soil Sampling and Analysis states that DU10 was subdivided based on surface contours and onsite communications with DEQ regarding inferred flow patterns. While DEQ accepts DU10a, DEQ does not agree with DU10b. Adjacent subdivisions should be extended along topographic contour lines and parallel to N. Bradford St.
 - c. DEQ recommends extending EDU02 eastward to the PIW building, given the high concentrations at EB02, EB03, EB04, EB44, and EB45. If the structural integrity of the building limits excavation, the asphalt apron should be inspected for cap integrity and repaired as needed. After all excavation activities have been completed, the surface should be cleaned. During the placement of the temporary cover, DEQ observed that the asphalt apron next to the PIW building is in variable condition and does not necessarily present a good long-term cap.
7. Table 1.
 - a. Table 1 includes a column of risk-based concentrations for a park user/recreational user. DEQ has only calculated a park user RBC for PCBs at this site. Additional RBCs for other chemicals should be discussed with DEQ prior to evaluation in the report. Concurrent to PIW seeking access agreements, DEQ is available for discussions about these other RBCs.

Please contact me at (503) 887-7059 or franziska.landes@deq.oregon.gov if you have any questions.

Sincerely,

Franziska Landes

Franziska Landes
Project Manager
Northwest Region Cleanup Section

Ec: David Hodson, Jacobs
Rebecca Digiustino, DEQ
Katie Daugherty, DEQ
Mike Poulsen, DEQ
Kevin Parrett, DEQ
Todd Hudson, Oregon Health Authority