**Pacific Hoe North ECSI 6561 Next Steps to Allow a NFA Determination
October 16, 2023 Meeting with Project Team**

DEQ and Clear Sky Capital have a Voluntary Cleanup Agreement to gather the information necessary to allow DEQ to make a No Further Action (NFA) determination for the former Pacific Hoe, Saw, and Knife property (Site).

A NFA was issued for the southern portion of the Site in May of 2014 following the removal and restoration of the berm area adjacent to Johnson Creek and screening areas not covered by paving or warehouses.

The site is in the process of removing the warehouses and paving to construct a Public Storage Facility. These activities will result in potentially contaminated soils being exposed at the ground surface and the generation of potentially contaminated soils from building footings.

Clear Sky Capital has produced a Contaminated Media Management Plan that details how the handling of contaminated media will be managed. DEQ has approved the plan.

Clear Sky Capital contracted Partner who performed a Phase I and Phase II investigations that identified the following Recognized Environmental Conditions (RECs):
• During Partner’s May 24, 2021, site reconnaissance, what appeared to be an active or recent chemical release of a florescent yellow/green substance with an appearance similar to ethylene glycol (antifreeze) was observed at the subject property. The release was observed to be contained and pooled along the back side of a bermed concrete pad under the partial enclosure that was sheltering the waste swarf bin. Partner was unable to determine the source of the release. A hose was observed between the swarf bin and the ground, and there was what appeared to be a square tank and some plumbing behind the enclosure. A rectangular shaped drain was also observed within the containment berm that was apparently closed, plugged, or clogged, as the liquid did not appear to be draining. However, the drain represents a potential historical conduit for the material to enter the subsurface. This apparent chemical release observed during the site reconnaissance is considered a REC.

• The subject property was identified on the Spill Data (SPILLS) database in the regulatory database report. According to available information, on August 7, 1999, approximately 150 gallons of machine coolant identified as sodium nitrate was discharged into a stormwater drain, which discharged to the adjacent Johnson Creek. On June 21, 2002, a fire in a compressor room damaged an air compressor, resulting in the release of approximately 25 gallons of lube oil. The water generated by the fire suppression system carried the oil out of the building and into the parking lot catch basin, and some of the oil entered the outfall that discharges to Johnson Creek. Both cases identified the responsible party as Pacific Hoe & Saw Company. No reports of cleanup or other investigation/remedial actions regarding either spill case were discovered during this assessment. The history of reported hazardous substance spills at the subject property are considered a RECs.

DEQ requests the development of work plan(s) to provide data for the potential soil impacts and allow a NFA determination:

1. Collect and analyze for all Contaminants of Concern (COCs) from the surface to 3 feet below ground surface (bgs) and above groundwater surface at approximately 12 feet bgs to evaluate potential risks from the ingestion, direct contact and inhalation pathway;
2. Screen all analytical results against DEQ Risk-Based Standards for the proposed use of the site;
3. Develop a list of COCs based on site history uses that include agriculture and industrial uses;
4. Collect and analyze soil samples in newly exposed soil surfaces that may in the future infiltrate stormwater to the subsurface to determine if there are impacts that may be mobilized into the subsurface and;
5. Coordinate infiltration and stormwater management requirements with the City of Portland for necessary permits considering environmental impacts detected during the site screening.