

MEMORANDUM | August 28, 2020

TO Alex Liverman and David Lacey, Oregon Department of Environmental Quality (DEQ)

FROM Peter Shanahan, HydroAnalysis, Inc. (HAI); Jennifer Hart and Gail Fricano, Industrial Economics, Inc. (IEc)

SUBJECT Five Tribe review of the “Proposed Source Control Decision Amendment BDC Properties LLC (former Calbag Metals – Front St) ECSI #2454,” dated July 31, 2020

This memorandum, submitted on behalf of the Five Tribes,¹ reviews the *Proposed Source Control Decision Amendment BDC Properties LLC (former Calbag Metals – Front St) ECSI #2454* (SCD Amendment) prepared by DEQ (DEQ, 2020).

GENERAL COMMENTS

1. We concur with DEQ’s conclusion on page 6 that the site “does not appear to be a current or reasonably likely future source of contamination to the Willamette River” along with the conditions outlined for future continuation of stormwater control measures on pages 6 and 7.
2. We recommend that the Site Description and History on page 2 include a discussion of the past use of the facility as a metals recycling operation and the cessation of those operations in 2001 as detailed by Golder (2017). That aspect of the history is significant in that it indicates the likely source of the site contaminants. Moreover, that the source ceased almost 20 years ago is an important factor in finding that the site no longer poses a threat of contamination to the river.
3. We found the clear explanation of the lines-of-evidence evaluation in Section 4.3 to be helpful.

REFERENCES

- Golder Associates Inc. (Golder). 2017. Stormwater Source Control Evaluation Report, BDC Properties, LLC, 4927 NW Front Avenue, Portland, OR 97210, Former Calbag Metals Site, ECSI #2454. Golder Associates, Inc., Lake Oswego, Oregon. March 2017.
- Oregon Department of Environmental Quality (DEQ). 2020. Memorandum from Alex Liverman and Paul Seidel to Ben Leake, U.S. EPA, Subject: Proposed Source Control Decision Amendment, BDC Properties LLC (former Calbag Metals – Front St), ECSI #2454. Department of Environmental Quality, State of Oregon. July 31, 2020.

¹ The five tribes are the Confederated Tribes of the Grand Ronde Community of Oregon, the Nez Perce Tribe, the Confederated Tribes of Siletz Indians, the Confederated Tribes of the Umatilla Indian Reservation, and the Confederated Tribes of the Warm Springs Reservation of Oregon.