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Offices in Portland and Bend Oregon

July 19, 2024

Oregon Department of Environmental Quality  
Attn: Kara Master, Manager, Cleanup Program, Northwest Region  
700 NE Multnomah Boulevard, Suite 600, Portland, Oregon 97232

RE: 2024 Annual Cap Inspection  
Starlight (formerly Westwind) Apartments, 355 NW 6<sup>th</sup> Avenue, Portland, Oregon  
(ECSI 6492/5315)

Ms. Kara Master,

EVREN Northwest, Inc. (ENW) presents this annual soil cap inspection report for the Starlight (formerly Westwind Apartments), performed in accordance with the approved Soil Cap Management Plan<sup>1</sup> prepared for the subject site located at 355 NW 6<sup>th</sup> Avenue, in the City of Portland, Oregon.

The soil cap was inspected on July 16, 2024, by ENW personnel and was found to be in excellent condition. During this reporting period, no requests for projects that would breach the soil cap were submitted to Starlight property management; therefore, the soil cap was not disturbed by construction or other site activities.

ENW administered the annual CAP training with property management staff on July 16, 2024, which included a review of the management objectives of the soil cap, as well as provided instruction to be aware of any disturbances and to inform ENW anytime there is a breach of the cap, or any planned activities that would breach the soil cap. During the training, Starlight management did not anticipate any subsurface work in the near-term.

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<sup>1</sup> ENW. August 30, 2022. Soil Cap Management Plan.

Please consider this letter and enclosed attachments the annual report for the calendar year 2024.

Sincerely,

*Evan Bruggeman*

Evan Bruggeman, R.G.  
Principal Field Geologist

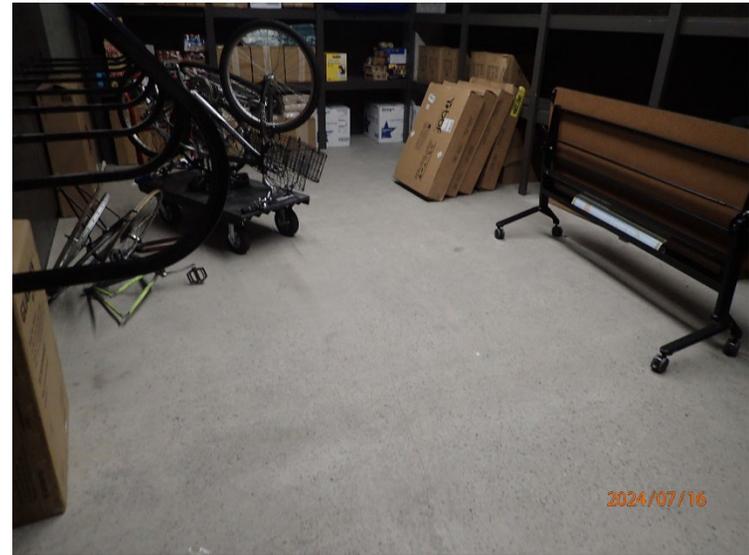
ENCLs:

1. Photographic Log
2. Inspection Forms

# PHOTOGRAPHIC LOG



View of concrete floor within the front desk area. The condition of the concrete floor in this area is typical of resident and employee areas of the ground floor and is in good condition.



View of concrete floor within the employee bike and storage room. The condition of the concrete floor in this area is typical of utility rooms on the ground floor and is in good condition.



The floor of the unoccupied tenant space remains unfinished. However, the space is unused and base gravel covers the demarcation fabric preventing contact with underlying soils.



Signage posted warning of soil cap. Several signs are located throughout the ground floor.



Starlight (Formerly Westwind) Apartments  
355 NW 6<sup>th</sup> Avenue  
Portland, Oregon

## Site Photographs

Project No.  
1017-21002-05

Attachment

**A**

# INSPECTION FORMS

# Soil Cap Annual Inspection Form

Date of Inspection: 7-16-2024

Inspected by: Evan Bruggeman

Maintaining the soil cap integrity and security **protects individuals** from exposure to contaminated soil and ground water beneath the site and is an ongoing responsibility. *At a minimum, the soil cap will be inspected annually.* Such inspections include monitoring cap thickness, degradation and any human activities with the potential to breach the building slab. More frequent inspections are encouraged and should also be documented with this form.

Persons performing the inspection must have a thorough understanding of the engineered soil cap and the Soil Cap Management plan.

## BUILDING SLAB (SOIL CAP)

Evaluate all areas of the building slab for degradation or any unauthorized human activity that is breaching (penetrating) or could breach the soil cap.

**Is any unauthorized excavation or building slab breaching occurring?** Y /  N

*If yes, immediately take steps to secure the area and manage the breach according to the Soil Cap Management or Contaminated Media Management Plan, as appropriate.*

**Are any natural elements (e.g., wind, rain, surface water, etc.) disturbing foundation?** Y /  N

**Are there any signs of wildlife (e.g., gophers, deer, dogs, etc.) disturbing foundation?** Y /  N

**Are there any potential conditions that may degrade or breach the soil cap?** Y /  N

*If the answer is yes to any of these questions, please document the conditions by 1) taking photographs, 2) showing location on a map, 3) describing condition and the measures taken to remedy the situation. Documentation should be kept with this form and submitted with the Annual Report.*

Commercial tenant space remains unoccupied and portions of the floor are unfinished. However, demarcation fabric is overlain by concrete and/or gravel in all areas.

No through-going cracks observed. Some small surficial cracking observed north/northwest of front desk area near resident bike room. Does not appear to be a cause for concern.

ACTION OR ADDITIONAL DOCUMENTATION REQUIRED? No

SIGNATURE OF PERSON PERFORMING INSPECTION: *Evan Bruggeman* 7/16/2024

# Annual Signage Review Form

For Year: 2024

Maintaining the soil cap integrity and security **to protect individuals** from exposure to impacted soil and ground water beneath the site is an ongoing responsibility. To ensure continued compliance with ODEQ requirements, the signage plan will be reviewed annually for effectiveness and signs will be verified present and in good. This form documents signage compliance and is to be submitted with the Annual Report to ODEQ.

ODEQ requires signs be posted regarding the soil cap. The Property Manager or their designee will work to determine the best locations for signs to be placed. A signage plan (list or map of sign locations and wording) will be developed and kept on file.

## ANNUAL SIGNAGE REVIEW AND INSPECTION

Please consider the effectiveness of the signage plan during this review and implement changes, as necessary. Please explain any yes answers in the spaces provided below or attach additional pages/supporting documentation as necessary.

**Person conducting review (name, position):** Evan Bruggeman, EVREN-NW

**Have there been any unauthorized breaches of the soil cap in the last year?** Y /  N

**If yes, could a change in signage have prevented this breach?** Y / N

*If yes, describe and implement changes to the signage plan.*

**Are signs still present and visible at all locations?**  / N

**Do any of the signs need repair?** Y /  N

**Are there any locations that signs should be added?** Y /  N

**Are there any other reasons to modify the signage plan?** Y /  N

Please modify signage plan according to need identified during this review and implement any changes in a timely manner.

ACTION OR ADDITIONAL DOCUMENTATION REQUIRED? No

SIGNATURE OF PERSON PERFORMING INSPECTION: *Evan Bruggeman* 7/16/2024

