Please consider the following guidance to develop work plans for your Site.

The Baxter and Fleming Site is within the Portland Harbor Superfund upland investigation area.

Based on this regulatory overlay, the Site will require a Source Control Evaluation in addition to investigation and/or cleanup that would be necessary to obtain a No Further Action determination. Below are links to guidance for a Source Control Evaluation and EPA Record of Decision information:

<https://www.oregon.gov/deq/hazards-and-cleanup/cleanupsites/pages/portland-harbor-strategy.aspx>

<https://www.oregon.gov/deq/hazards-and-cleanup/cleanupsites/pages/portland-harbor.aspx>

After or concurrent with completing the investigation needed for a Source Control Evaluation, the Site can proceed with the remedial investigation to lead to a No Further Action determination. Below is guidance to perform a remedial investigation:

<https://www.oregon.gov/deq/FilterDocs/RIFSScopeWorkLongForm.pdf>

Please discuss this information with your team and contact me if you have questions regarding the development of work plans for a Source Control Evaluation and Remedial Investigation to support a No Further Action.

Thank you

Jim Orr