



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region
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December 6, 2017

John Kuiper
Amec Foster Wheeler
7376 SW Durham Rd.
Portland, OR 97224

RE: Draft Closeout Report
for Hoyt Street Railyard – Block 26 in Portland
ECSI #6103

John:

DEQ staff has reviewed the October 31, 2017 *Draft Closeout Report* prepared by Amec Foster Wheeler for the southwest quarter of Block 26 of the former Hoyt Street Railyard in Portland.

DEQ generally approves of the *Draft Closeout Report* as written, subject to the following comments. Please prepare a final Project Closeout Report at the completion of project construction incorporating our comments for final review and approval:

- Section 6.1 of the report states that 2,079 tons of contaminated soils were excavated and removed from the site during construction. However, after reviewing the Contaminated Soil Disposal Records in Appendix B, it appears that the total of 2,079 tons only applies to soils shipped to the Hillsboro Landfill in August. An additional 1,827 tons of soil were excavated and removed from the site in July, for a total of 3,906 tons.
- Section 6.2.2 of the report questions whether a Cap Inspection and Maintenance Plan (CIMP) is necessary for the site. A CIMP is required for any site where a cap is installed to prevent direct contact with contaminated soils, to help insure the long term integrity of the cap. At Block 27, as with almost all of the Hoyt Street Railyard blocks, the cap consists of the building foundation, sidewalks, and/or three feet of clean soil.
- In Appendix A, there appear to be three copies of the laboratory report for the “Pile 3” sample. Also, several of the laboratory reports did not scan correctly and are unreadable.

I can be reached at (503) 229-5369 or by e-mail dana.kevin@deq.state.or.us if you would like to discuss our comments prior to finalization of the *Draft Closeout Report*. We thank you for your work on this project.

Sincerely,

Kevin Dana, Project Manager
Northwest Region Cleanup Section