

*Contained-In Determination Approval Memo*

**Oregon DEQ Contained-In Determination Approval Signoff Sheet**

**Site Name:** East Side Plating #4, ECSI 1010

*Location:* 310 SE St. Stephens Street, Portland, OR 97214

*Media:* Soil and Groundwater

*Approved Disposal Location:* Waste Management's Hillsboro Landfill in  
Hillsboro or CWM Arlington

*for soil and Patriot Environmental for groundwater-for wastewater treatment.*

*Signatures:*



Date: 11/7//2024

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Cleanup project manager:



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Hazardous Waste Program staff: Michelle Olson

Date: 11/7/2024



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Solid waste or hazardous waste permit writer [if needed]:

Date: 11/14/24

*Audrey O'Brien*

11/13/2024

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Hazardous Waste or Solid Waste Program manager:

Date:

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Cleanup toxicologist [if needed]:

Date:



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DEQ Cleanup Program manager:

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Date: 11/14/24



## **Memorandum**

**Date: 11.07.2024**

**To: Project File, East Side Plating #4, ECSI 1010**

**From: Rob Hood, Project Manager, Northwestern Region Cleanup Program**

**Subject: No Longer Contained-In Determination for East Side Plating #4, Portland, Oregon (ECSI 1010)**

DEQ's Northwestern Region Environmental Cleanup and Hazardous Waste programs have prepared this No Longer Contained-In Determination for soil cuttings and groundwater investigation derived waste generated during an investigation project at the East Side Plating #4 cleanup site. East Side Plating #4 provides customers with a broad array of processing capacities that include plating, powder coating, polishing and part marking. Prior to this, the site was occupied by residences and livestock liveryes until 1946. Releases of Perchloroethylene (PCE) and Trichloroethene (TCE), from past industrial practices have contaminated soil and groundwater beneath the site. PCE and TCE contamination in environmental media from this site would be considered by DEQ to contain a listed hazardous waste (F002).

This determination is for approximately 125 gallons of soil waste that was generated in May-June 2024 during investigation of on-site soil and 150 gallons of groundwater. The IDW soil generated during drilling activities is currently stored in three labeled drums. The groundwater is also stored in three 55-gallon drums. All the soil and water are and have been stored within the building on-site.

Two representative composite samples were collected, one from the three 55-gallon drums of IDW soil and one from the three 55-gallon drums of IDW water. Analysis was conducted by, EPA Method 8260D and 6010D as "totals, not TCLP. Low levels of PCE and TCE were detected in the IDW soil and the IDW water samples. The results of the chemical analysis are tabulated below. Only chemicals detected by analysis are shown in the table.

**Table I: Media Pollutant and Applicable Risk Based Concentrations**

Media	PCE Concentration	Assessment of Risk Based Concentration			Land Disposal Screening Criteria (LDR UTS or ATS) (ppm)
		PCE: Soil Direct Contact (ppm)	PCE: Water (ppb)	20 x TCLP Limit PCE for Soil (ppm)	
IDW Soil	0.018 ppm	1,800	N/A	14	6.0 60
IDW Water	0.70 ppb	N/A	5,600	N/A	6.0 60

Media	TCE Concentration	Assessment of Risk Based Concentration			Land Disposal Screening Criteria (LDR UTS or ATS)
		TCE: Soil Direct Contact (ppm)	TCE: Water (ppb)	20 x TCLP Limit TCE for Soil (ppm)	
IDW Soil	0.0097 ppm	130	N/A	10	6.0 60
IDW Water	5.1 ppb	N/A	430	N/A	6.0 60

A No Longer Contained-In Determination is required to demonstrate that the soil and water do not qualify as characteristic hazardous waste, that concentrations of solvent-related chemicals are below protective levels, and, if applicable, that land disposal restrictions are met.

To demonstrate that the soil “no longer contains” hazardous waste, the following conditions need to be met:

1. The soil (a solid) must not exhibit a characteristic of hazardous waste (must not be reactive or toxic). The potential for soil containing a waste to exhibit the toxicity characteristic is evaluated through comparison of constituent concentrations in leachate, extracted from the waste, using the Toxicity Characteristic Leaching Procedure, also called TCLP, with the limits specified at 40 CFR, Part 261.24. Representative (total) chemical concentrations for the soil are compared to a value of 20 times the TCLP limit (to account for the 20 to 1 dilution inherent in the TCLP analysis method) to determine if the limits could potentially be exceeded. If the 20 times TCLP limit for any chemical is

exceeded, then the waste may be a characteristic hazardous waste. The 20 times TCLP limit for PCE is 14 parts per million or 14,000 parts per billion, while the corresponding value for TCE is 10 parts per million (ppm) or 10,000 parts per billion (ppb). The soil does not fail the toxicity characteristic for PCE or TCE. The soil is not a characteristic hazardous waste.

2. The water must not exhibit a characteristic of a hazardous waste (must not be ignitable or corrosive). Based on knowledge of process, DEQ has determined that the water is neither ignitable nor corrosive.
3. Concentrations of hazardous constituents from listed waste must be below health-based levels. Currently, it is DEQ policy that if soil is to be taken to a solid waste permitted Subtitle D lined landfill, then concentrations of hazardous constituents must be below the DEQ Construction Worker Risk Based Concentration for direct contact. Currently this RBC for PCE is 1,800 ppm and the RBC for TCE is 130 ppm. The concentrations of PCE and TCE detected in the IDW soil are well below the construction worker direct contact RBCs.
4. For water, DEQ's current policy is that if the water is to be taken to a Clean Water Act-permitted wastewater treatment facility, then concentrations of hazardous constituents must be below the Groundwater in Excavation RBC. Currently this RBC for PCE is 5,600 ppb and the RBC for TCE is 430 ppb. The concentration of PCE in the IDW water is well below this RBC.
5. The RCRA land disposal restrictions do not apply because the concentrations are below the LDR and waste was not removed from the area of contamination prior to this determination.

The table above illustrates the sample results compared to the applicable DEQ RBCs and TCLP.

Underlying constituents of PCE and TCE might be present in the soil at concentrations below the minimum reporting levels shown in the laboratory analytical data. Using the MRL concentrations and our knowledge of process, we can assume the following about the soil and water:

- It would not be ignitable, corrosive nor reactive;
- Concentrations of underlying constituents would be below toxicity characteristic levels;
- Concentrations of underlying constituents would be below DEQ protective levels.

Based on review of the data and the above findings, DEQ has determined that the soil and groundwater generated during drilling and sampling activities at the East Side Plating Plant #4 site do not exhibit characteristics of a hazardous waste. The concentrations of detected PCE and TCE in the water and soil samples are below the DEQ's generic Construction and Excavation and Construction Worker RBCs, respectively. The soil does not pose an unacceptable risk to industrial worker exposure under the waste management scenario proposed. If this soil is disposed of at a hazardous waste permitted Subtitle C or a solid waste permitted Subtitle D equivalent lined landfill that DEQ has approved for this purpose, the waste will be considered to no longer contain hazardous waste. Similarly, if this water is discharged,

with the approval of the sanitary sewer authority, transported to Patriot Environmental and managed in its CWA permitted wastewater treatment unit, DEQ agrees this wastewater will no longer contain hazardous waste. If the waste and wastewater is not managed and disposed of in accordance with these conditions of approval, this No Longer Contained-In Determination does not apply, the waste remains hazardous waste, and must be managed and disposed of in compliance with applicable hazardous waste regulations.