

State of Oregon
Department of Environmental Quality

Memorandum

Date: March 7, 1995

To: Andree Pollock, NWR/UST
From: Gil Wistar, NWR/VCSAS *GW*
Subject: James River Flexible Packaging Div., file #26-89-064
cc: Mike Rosen

Andree, yesterday you requested that I evaluate whether the "press room" underground tank storage (UST) area at this site could be addressed under the UST Section's oversight, along with the gasoline UST on a different part of the site. It is my view that this would **not** be appropriate, for the reasons outlined below.

- * Based on a 1986 James River inventory, the USTs beneath the press room area contained, as the *current or last stored substance*, a variety of alcohols and petroleum distillates. These are not fuels, and because the tanks had been in use since 1960, they could have contained substances other than those listed in the 1986 inventory.
- * Subsequent to the 1989 removal of these USTs and 150 yards of contaminated soil from the tank pit, chlorinated solvents were detected in soil gas and soil borings in the press room area. Boring results show PCE levels above Oregon Soil Cleanup Standards in shallow soil in this area. Although SEACOR states that the VOCs *may not be* from the former USTs, it is also possible that they did originate from the tanks. Regardless of these contaminants' source(s), this discovery requires further evaluation.
- * Monitoring well JR-2, located in the center of the former press room USTs, contained high concentrations of isopropanol, ethanol, acetone, and MIBK, for seven consecutive sampling rounds (between 9/89 and 8/91). Because of the solubility of these compounds and their high initial concentrations, their apparently sudden disappearance could have resulted from groundwater dilution or plume migration. Further evaluation is needed to determine what in fact has happened to these compounds.

Should James River wish to obtain a "no further action" determination for the press room area and other contaminated portions of the site not related to fuel USTs, participation in the Voluntary Cleanup Program would be necessary.