



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

June 26, 2023

via electronic mail

Attention: Eric Maughan
NetCompliance Environmental Services, LLC
2112 East 26th Street
Vancouver, WA 98661
Via email: ericm@net-compliance.com

RE: Work Practice and Disposal Variance Request
USPS Packaging and Distribution Center
715 NW Hoyt St, Portland OR

Dear Eric,

On June 21, 2023, DEQ Northwest Region received your revised asbestos abatement work plan for the abatement of friable asbestos-containing material (ACM) identified as an asphaltic membrane on the exterior of subgrade, concrete tunnel walls of the former USPS Packaging and Distribution Center (P&DC). The P&DC is located at 715 NW Hoyt St in Portland, OR. Your work plan outlines your intentions to perform friable asbestos abatement with variance to work practice requirements set forth in Oregon Administrative Rule (OAR) 340-248-0270(8)(e)(D), negative pressure enclosure (NPE), and OAR 340-248-0270(8)(g), use of mechanical equipment outside of an NPE. In addition to your request to waive friable asbestos work practice rules, the request also includes a description for alternative disposal of asbestos-containing waste material (ACWM), under OAR 340-248-0280(12).

DEQ understands the following assumptions and conditions are present at the work site:

- The ACM was applied as a waterproofing membrane on the outside of concrete tunnel walls that comprise a subgrade corridor located below the recently demolished P&DC building.
- The tunnel walls are approximately 14 feet tall and excavation next to the walls poses a safety risk to placing workers in the trench; therefore, an excavator will be used to remove contaminated soil.
- A test pit conducted in May 2023 adjacent to a section of tunnel wall discovered backfilled soil was likely not compacted during original placement, and has resulted in surface water infiltrating along the tunnel wall.
- Due to saturation of the soil in contact with the ACM membrane, the condition of the membrane has changed and the delaminated ACM in the soil surrounding the exterior tunnel walls is friable.
- During excavation, it is anticipated the ACM will continue to release from the tunnel walls and be comingled with the soil.
- It is estimated that approximately 9,000 tons of soil contaminated with the asphaltic ACM must be managed as ACWM and disposed at a solid waste disposal facility permitted to accept asbestos waste.
- DEQ understands the ACWM will be transported to Wasco Landfill for disposal. Wasco Landfill is permitted to accept asbestos-containing materials under their approved Special Waste Management Plan. DEQ's Eastern Region Solid Waste Program has issued a separate approval letter to Wasco Landfill for receipt and management of this ACWM unpackaged.

DEQ grants approval to perform this friable asbestos abatement project providing the following provisions are met:

- 1) This friable asbestos abatement project is to be abated as outlined in your proposed work plan and this variance approval letter. Any deviations require prior approval from the Department;
- 2) All asbestos abatement related activities are required to be conducted in an established regulated area consisting of asbestos barrier tape and signage;
- 3) Removal of the friable asbestos-containing material is allowed as long as adequate wetting or an approved alternative dust suppression method is used during the abatement process;
- 4) Only certified asbestos workers and supervisors are allowed to perform friable asbestos abatement;
- 5) Only certified asbestos workers, supervisors, and consultant(s) are allowed within the regulated area. This includes the mechanical operator(s);
- 6) An entity who is National Institute of Occupational Safety and Health (NIOSH) 582 certified shall conduct ambient air area monitoring at the perimeter of the regulated area during active abatement. It is recommended that ambient area air sampling results be analyzed daily or at a minimum weekly, and copies of the analytics kept onsite;
- 7) All applicable work practices listed in OAR 340-248-0270 must be employed, except for those waived by this letter;
- 8) Use of mechanical equipment for the asbestos abatement project is allowed. The mechanical equipment is not allowed to drive over or purposely pulverize any ACM and/or ACWM at any time;
- 9) If there is excess water from the abatement process, it must be collected. The water can either be filtered prior to disposal into the sanitary sewer or the water must be disposed of as asbestos-containing waste material (ACWM);
- 10) ACWM must be immediately placed in an appropriate container after removal, properly labeled and disposed as required in OAR 340-248-0280, except as allowed below as interim storage;
- 11) The interim storage of ACWM that has been stockpiled onsite must be stored in a secure and regulated area to prevent tampering by unauthorized persons;
 - a) Stockpiled soil contaminated with asphaltic ACWM must be clearly demarcated from non-contaminated soil piles;
 - b) Stockpiled ACWM soil must be wetted and covered at the end of each work shift to prevent disturbance of the soil;
 - c) Excess water from the stockpiles must be controlled to prevent runoff into non-regulated areas;
- 12) ACWM is allowed to be transported unpackaged to a permitted solid waste disposal facility, provided the following conditions are met:
 - a) ACWM soil must be adequately wetted to ensure it remains wet during transport and unloading at the receiving disposal facility;
 - b) Excess water must be contained within the transport container and not allowed to leak out of the container during transport;
 - c) All loads shall be tightly covered in a manner that prevents wind erosion of the load during transport;
 - d) After disposition of the ACWM at the disposal facility, the transport containers must be tightly covered to prevent residual soil from exiting the container during transport back to the P&DC facility;
 - e) All transport containers must be decontaminated prior to any use other than hauling the ACWM soil and at the end of the abatement project;
- 13) No visible emissions are allowed during any part of the abatement process;
- 14) At the conclusion of this project, no open accumulation or storage of ACWM is allowed at the project site;
- 15) A copy of the asbestos survey report must be maintained on site and readily available;
- 16) A copy of this letter must be kept at the work site and readily available for inspection; and
- 17) This approval letter applies only to the asphaltic asbestos-containing material on the subgrade, concrete tunnel walls of the abatement project listed above and expires at the completion of the asbestos abatement project.

Failure to follow this approval letter may result in possible asbestos rule violations. If you have any questions or need additional technical assistance, please call me at (503) 686-3903 or email at kara.e.master@deq.oregon.gov.

Sincerely,



Kara Master, DEQ
NW Region Cleanup Section

Cc: Todd Hesse, DEQ
Audrey O'Brien, DEQ
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Kevin Dana, DEQ
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Ecc: NetCompliance contractor e-file