



# Oregon

Kate Brown, Governor

## Department of Environmental Quality

Northwest Region Portland Office

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July 6, 2017

Mr. Jacob Neal  
Portland General Electric Company  
121 SW Salmon St.  
3WTC0403  
Portland OR 97204

Re: Bors Property  
ECSI #901

Dear Mr. Neal:

The Oregon Department of Environmental Quality (DEQ) has reviewed the May 18, 2017 “Bors Property NFA Evaluation” for the Bors Property project.

For this evaluation it appears that soil removal PCB confirmation data for the entire project was aggregated for statistical risk analysis. This approach does not take into account the current tax lot divisions of the property. Samples from three current tax lots were combined for analysis. Future risk should be evaluated for individual tax lots as future residents are expected to primarily occupy their own lots. Another potential problem is the inclusion of many “non-detect” samples from the essentially clean “clean fill source area”. These non-detect samples can lead to under-prediction of risk. DEQ re-evaluated the data after removing these potential biases and found that the CH2MHill result slightly under-estimates risk.

We are concerned about the potential for polychlorinated dibenzodioxins and dibenzofurans (dioxin/furans) contamination. These contaminants are released in the resulting smoke when wire insulation and PCB-containing oil are burned. The fallout of dioxin/furans contamination can be, in our experience, more extensive than the footprint of spilled oil. In the original investigation only very limited analysis for dioxin/furans was performed on soil that was later removed. Our primary area of interest, based on current data, is the 2.87 acre tax lot where the main salvage operation took place.

The lack of dioxin/furans sample results is a data gap for the project and DEQ is not able to reaffirm the earlier No Further Action (NFA) decision from 2001. Therefore DEQ requests that further investigation be performed to close the data gap. We request the collection of a triplicate incremental sampling methodology (ISM) sample or samples in the 2.87 acre tax lot. The decision unit or units (DU) should be chosen to encompass the area closest to the two original burning areas and incorporate likely prevailing wind directions for the vicinity. The areas of 1999 soil removal should be noted and mapped in the planning process. We suggest that individual increments should be composited through 0-6 inches from the surface. The samples should be analyzed for

dioxins/furans using method 1613 as well as PCB congeners using method 1668, and the metals arsenic, lead, mercury, copper, cadmium, and chromium.

Please submit a short work plan for ISM sampling including a sample map and justification for the proposed decision units chosen. Please note that I will be retiring from DEQ in July and the new Project Manager will be Kevin Dana at (503)-229-5369 and [dana.kevin@deq.state.or.us](mailto:dana.kevin@deq.state.or.us). If you have any questions please contact Kevin, however he is scheduled to be on vacation till July 24. In his absence contact Kevin Parrett at (503)-229-5567 and [parrett.kevin@deq.state.or.us](mailto:parrett.kevin@deq.state.or.us) or Mike Poulsen at (503)-229-6773 and [poulsen.mike@deq.state.or.us](mailto:poulsen.mike@deq.state.or.us).

Sincerely,



Robert Williams  
Project Manager

Cc: Jewel Lanning-Walters  
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Oregon City, OR 97045

Kevin Dana, Mike Poulsen, DEQ