

February 6, 1997

ARNIE SCHAUFLE  
LOUIS DREFUS ELEVATORS  
222 SW COLUMBIA SUITE 1133  
PORTLAND OREGON 97201

DEPARTMENT OF  
ENVIRONMENTAL  
QUALITY

NORTHWEST REGION

Re: Louis Drefus Elevators  
File No. 26-92-0001

Dear Mr. Schaufler:

The Department of Environmental Quality has completed its review of the information submitted to date concerning the underground storage tank (UST) decommissioning cleanup conducted at the foot of N. Holladay Street in Portland, Oregon. The Department has determined that the decommissioning appears to have met the requirements of Oregon Administrative Rules (OAR) 340-122-205 through 340-122-360 and that no further action is required at this time.

This determination is a result of our evaluation and judgment based on the regulations and facts as we now understand them, including:

1. A 6,000 gallon diesel, a 6,000 and a 1,000 gallon gasoline UST were decommissioned at this location. The tanks were recycled at Oregon Pacific Steel.
2. Although, gasoline odors were observed during the decommissioning, confirmatory soil samples failed to detect any contamination.
3. No groundwater was encountered in the excavations.

The Department's determination will not be applicable if new or undisclosed facts show that the cleanup does not comply with the referenced rules. The Department's determination also does not apply to any conditions at the site other than the release of the petroleum product specifically addressed in the report(s).

Please note that pursuant to OAR 340-122-360(2), a copy of your report must be retained until ten (10) years after the first transfer of the property. We recommend that a copy of this information be kept with the permanent facility records.

John A. Kitzhaber  
Governor

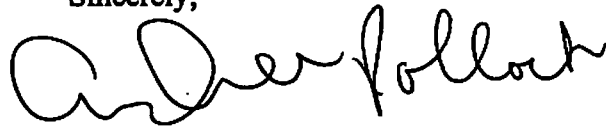


2020 SW Fourth Avenue  
Suite 400  
Portland, OR 97201-4987  
(503) 229-5263 Voice  
TTY (503) 229-5471  
DEQ-1

Arnie Schaufler  
February 6, 1997  
Page 2

Your efforts to comply with the regulations to ensure that your facility has been adequately cleaned up have been appreciated. If you have any questions, please feel free to contact me at (503) 229-5474.

Sincerely,

A handwritten signature in cursive script that reads "Andree Pollock". The signature is written in black ink and is positioned above the printed name and title.

Andree Pollock  
UST Cleanup Specialist

(avp:AVP)

December 18, 1995

Mr. Arnie Schaufler  
Louis Dreyfus Corporation  
222 S. W. Columbia  
Portland, OR 97201

Re: Louis Dreyfus Grain Elevator  
Log No. 26-92-0001

Dear Mr. Schaufler:

The purpose of this letter is to provide notification that you will be receiving an invoice from the Department of Environmental Quality (DEQ) for costs the DEQ has accrued during oversight activities at the facility listed above. A release of petroleum (a hazardous material) at this site was reported to the DEQ as required by law.

Responsible parties are required to pay costs incurred by DEQ for oversight of investigation and cleanup of spills and releases of hazardous materials (ORS 465.225). This includes both direct and indirect costs. Direct costs include site-specific expenses and legal costs. Examples are: time spent by a project manager conducting a site visit or reviewing a report, or clerical staff starting a file or updating a database.

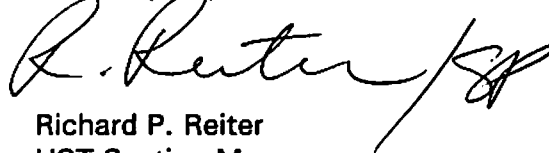
Indirect costs are general management and support costs accrued by the DEQ which are associated with oversight of this cleanup, but which are not charged as direct, site-specific costs. An example is time associated with processing timesheets and payroll.

The cost(s) you will be invoiced for may have been accrued over the last several years. Due to a large backlog of projects, invoices on low priority projects were delayed. We apologize for any inconvenience this may have caused.

If you have any questions regarding the Department's cost recovery program or your invoice, please contact our Waste Management and Cleanup Division at (503) 229-5812.

Should you have any technical questions about your cleanup project, please contact the Northwest Region's Underground Storage Tank duty officer at (503) 229-5263.

Sincerely,



Richard P. Reiter  
UST Section Manager  
Northwest Region

RPR:m  
SM6335



811 SW Sixth Avenue  
Portland, OR 97204-1390  
(503) 229-5696  
TDD (503) 229-6993  
DEQ-1



LUST # 26-92-1

UST 6714

Oregon Department of Environmental Quality  
UNDERGROUND STORAGE TANK DECOMMISSIONING/SERVICE CHANGE REPORT

DEQ FACILITY NUMBER: 6714

DATE: FEB 5 1992

FACILITY NAME: LOUIS DREYFUS

Department of Environmental Quality

FACILITY ADDRESS: FOOT OF N. HOLLADAY  
PORTLAND, OR 97227

RECEIVED  
MAR 3 1992

PHONE: 232-0127

UST Compliance Section

The following information **MUST** be submitted by the underground storage tank owner, operator or licensed DEQ Supervisor within 30 days following completion of the tank decommissioning or changing tank contents to a non-regulated substance. (OAR 340-150-001 through -150)

The attached supplemental checklist should be prepared by the person performing the decommissioning. The checklist should be provided to DEQ and the tank owner to demonstrate that all required practices were followed.

Ordinarily the checklist is filled out by the DEQ licensed Service Provider or Supervisor. Owners who wish to personally decommission a tank must follow all DEQ and other applicable standards. The owner should contact the DEQ Regional Office prior to starting the decommissioning to receive current copies of underground storage tank regulations.

**A. DATES:**

Decommissioning/Service Change Notice - Date Submitted: 6-12-91 (30 days before work starts)  
Work Start Telephone Notice - Date Submitted: 12-27-91 (3 working days before work starts)  
DEQ Person Notified: PORTLAND OFFICE  
Date Work Started: 12-30-91  
Date Work Completed: 1-20-92

Note: Provide the following information if any soil or water contamination is found during the decommissioning. Contamination must be reported by the UST owner or operator within 24 hours. The licensed service provider must report contamination within 72 hours after discovery unless previously reported.

Date Contamination Reported: N/A By: \_\_\_\_\_  
DEQ Person Notified: \_\_\_\_\_  
Backfill Telephone Notice - Date Called: \_\_\_\_\_ (before backfilling)  
DEQ Person Notified: \_\_\_\_\_

DEPT OF ENVIRONMENTAL QUALITY  
RECEIVED

APR 13 1992

NORTHWEST REGION

**B. PERMITS:**

Note: DEQ permits or an addendum to the UST permit(s) may be needed where soil or water cleanup is required.

DEQ Water Discharge Permit #: N/A Date: \_\_\_\_\_  
Disposed to (Location): \_\_\_\_\_  
DEQ Solid Waste Disposal Permit #: \_\_\_\_\_ Date: \_\_\_\_\_

FIT & TRU

Department of Environmental Quality



U.S. Compliance Section

U.S. COMPLIANCE SECTION

U.S. COMPLIANCE SECTION

U.S. COMPLIANCE SECTION

**B. PERMITS (Continued)**

UST Soil Treatment Permit Addendum - Type: \_\_\_\_\_ Date: \_\_\_\_\_

Soil Disposal or Treatment Location: \_\_\_\_\_

**C. TANK INFORMATION:**

Tank #	DEQ UST Permit	Tank Size in (Gallons)	Product: Gasoline, Diesel, Used Oil, Other?		Closure or Service Change?			Tank to be Replaced?	
			Present	New	Tank Removal	Closure <sup>∞</sup> Inplace	New <sup>∞</sup> Product	Yes*	No
6714-1	AHE0	6,000	GAS		X				X
6711-2	AHE2	6,000	DIESEL		X				X
6714-3	AHEF	6,000	GAS		X				X

\* Where decommissioned tank(s) are replaced by new underground storage tanks the UST owner or operator must submit a new permit application containing information on the new tanks 30 days before placing them in service.

∞ Submit a soil sampling plan to the DEQ regional office and receive plan approval prior to starting work if 1) tank is to be decommissioned in-place, 2) tank contents are changed to a non-regulated substance, or 3) tank contains a regulated substance other than petroleum.

**D. DISPOSAL INFORMATION:**

Tank #	Tank & Piping Disposal Method				Disposal Location of Tank Contents *	
	Scrap	Land-fill	Other	Identify Location & Property Owner	Liquids	Sludges
1	X			SCHWITZER STEEL PORTLAND, OR	PENDING	
2	X			SCHWITZER STEEL PORTLAND, OR		
3	X			SCHWITZER STEEL PORTLAND, OR		

\* Note: The tank contents, the tank and the piping may be subject to the requirements of Hazardous Waste regulations. If you have questions, contact the DEQ Hazardous Waste Section at (503) 229-5913 or DEQ regional office hazardous waste staff.

**E. CONTAMINATION INFORMATION:**

Tank #	Ground* water in pit?	Product odor in soil?	Product stains in soil?	Number of Samples	Laboratory (Name, City, State, Phone)
					N/A

\* Note: Sampling is required if groundwater is encountered. See cleanup rules.

**F. SITE SKETCH:** (Show location of adjacent roads, property lines, structures, dispenser, & all USTs) (Show North, general direction of ground slope and soil sample locations. Sketch does not need to be drawn to scale. You may attach a separate drawing.)

**G. WORK PERFORMED BY:**

DEQ Service Provider's License #: \_\_\_\_\_ Construction Contractors License #: \_\_\_\_\_

Name: \_\_\_\_\_

Telephone: \_\_\_\_\_

DEQ Decommissioning Supervisor's License #: 10391

Name: Brian Crockett

Telephone: 283-2151

DEQ Soil Matrix Service Provider's License #: \_\_\_\_\_ (If applicable)

Name: \_\_\_\_\_

Telephone: \_\_\_\_\_

DEQ Soil Matrix Supervisor's License #: \_\_\_\_\_ (If applicable)

Name: \_\_\_\_\_

Telephone: \_\_\_\_\_

**H. ATTACHMENTS TO THIS REPORT:**

1. Attach a copy of the laboratory report showing the results of all tests on all soil and water samples. The laboratory report must identify sample collection methods, sample location, sample depth, sample type (soil or water), type of sample container, sample temperature during transportation, types of tests, and copies of analytical laboratory reports, including QA/QL information. Include laboratory name, address and copies of chain-of-custody forms.

2. If contamination is detected and a Level 2 or Level 3 soil matrix cleanup standard is selected attach a copy of the soil matrix analysis for the site including methods of determining soil type, depth to groundwater, and sensitivity of uppermost aquifer.

**I. REPORT FILING:**

This report, signed by the tank owner or operator, complete with all applicable attachments must be filed with DEQ headquarters within 30 days after the excavation is backfilled or change-in-service is complete. Contact the DEQ regional office prior to filing this report where special circumstances exist at the site (such as water in pit, remaining pockets or contamination, etc.).

NOTE: If contamination was found during site assessment at decommissioning or change-in-service and reported to DEQ regional office, this report may be submitted with either the first interim cleanup report or the final cleanup report, whichever is first.

Return Completed Form to: Department of Environmental Quality  
UST Program - Decommissioning Report  
811 S.W. Sixth Ave.  
Portland, Oregon 97204

I have personally reviewed this report and the attachments and find them to be true and complete.

Signature: Daniel J. Stutz Date: 2/26/92  
(Owner or Operator)

For information: (503) 229-5733 or Toll Free in Oregon UST HELPLINE 1-800-742-7878

NWR

Oregon Department of Environmental Quality  
UNDERGROUND STORAGE TANK DECOMMISSIONING CHECKLIST

DEQ FACILITY NUMBER: 6714

FACILITY NAME: LOUIS DREYFUS

FACILITY ADDRESS: FOOT OF N HOLLADAY  
PORTLAND, OR 97227

PHONE: 232-0127

DATE: Feb 5, 1992  
DEPT OF ENVIRONMENTAL QUALITY  
**RECEIVED**

APR 10 1992

NORTHWEST REGION

A. SAFETY EQUIPMENT ON JOB SITE:

Fire Extinguisher: Type/Size: \_\_\_\_\_

Recharge Date: \_\_\_\_\_

Combustible Gas Detector: Model: \_\_\_\_\_

Calibration Date: \_\_\_\_\_

Oxygen Analyzer: Model: \_\_\_\_\_

Calibration Date: \_\_\_\_\_

B. DECOMMISSIONING: All Tanks: (Unk. = Unknown, N/A = Not Applicable)  
(Check Appropriate Box)

1. All electrical equipment grounded and explosion proof?
2. Safety equipment on job site?
3. Overhead electrical lines located?
4. Subsurface electrical lines off or disconnected?
5. Natural gas lines off or disconnected?
6. No open fires or smoking material in area?
7. Vehicle and pedestrian traffic controlled?
8. Excavation material area cleared?
9. Rainwater runoff directed to treatment area?
10. Drained and collected product from lines?
11. Removed product and residual from tank?
12. Cleaned tank?
13. Excavated to top of tank?
14. Removed tank fixtures? (pumps, leak detection equip.)
15. Removed product, fill and vent lines?

Department of Environmental Quality  
**RECEIVED**  
MAR 3 1992  
UST Compliance Section

Yes	No	Unk	N/A
X			
X			
X			
X			
X			
X			
X			
			X
X			
X			
X			
X			
X			
X			

C. TANK ABANDONMENT IN-PLACE:

16. Sampling plan approved by DEQ?  
Date: \_\_\_\_\_ DEQ Staff: \_\_\_\_\_

--	--	--	--

UNITED STATES DEPARTMENT OF ENVIRONMENTAL QUALITY

WASHINGTON, D.C. 20460

OFFICE OF COMPLIANCE

U.S. COMPLIANCE SECTION  
RECEIVED  
MAR 3 1983  
Department of Environmental Quality

**B. DECOMMISSIONING: All Tanks: (Unk. = Unknown, N/A = Not Applicable)  
(Check Appropriate Box)**

Yes	No	Unk	N/A
X			
X			

17. Contamination concerns fully resolved?

18. Fill Material? Type: 1" CRUSKRO

**D. TANK REMOVAL:**

19. Tank placement area cleared, chocks placed?

\* 20. Purged or ventilated tank to prevent explosion?  
Method used: \_\_\_\_\_ Meter reading: \_\_\_\_\_

21. No chains or steel cables wrapped around tank for removal?

22. Tank removed, set on ground, blocked to prevent movement?

23. Tank set on truck and secured with strap(s)?

24. Tank labeled before leaving site?

X			
X			
X			
X			
X			

**E. SITE ASSESSMENT:**

25. Site assessed for contamination? See OAR 340-122-340

26. Soil samples taken and analyzed?

27. Decommissioning/Change-in-Service report sent to DEQ?

28. Was contamination found? Date/Time: \_\_\_\_\_

29. Was contamination reported to DEQ? By: \_\_\_\_\_  
Date/Time: \_\_\_\_\_ DEQ Staff: \_\_\_\_\_

30. Was hazardous waste determination made for tank contents (Liquids/sludges)?

✓			
✓			
X			
	X		
			X
X			

31. Disposal location of tank(s) contents.

Name: PENDING Date: \_\_\_\_\_

Address: \_\_\_\_\_

Attach disposal receipt.

32. Disposal or recycling location of removed tank(s) and associated piping.

Name: OREGON PACIFIC STEEL Date: 12-31-91

Address: PORTLAND, OR

Attach disposal receipt.

33. If tank(s) are intended to be reused, identify new tank site.

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Address: \_\_\_\_\_

Purpose of Reuse: \_\_\_\_\_

F. WORK PERFORMED BY:

DEQ Service Provider's License #: 10534  
Name: PEMCO  
Telephone: 283-2151

DEQ Decommissioning Supervisor's License #: 10391  
Name: Brian Crockett  
Telephone: 283-2151

Department of Environmental Quality  
**RECEIVED**  
MAR 3 1992  
UST Compliance Section

E. CHECKLIST FILING:

1. Provide copy of checklist to the UST owner and operator.
2. Send completed checklist to the DEQ headquarters within 30 days after the excavation is backfilled.

NOTE: If contamination was found during decommissioning and reported to DEQ regional office, this report may be submitted with either the first interim cleanup report or the final cleanup report, whichever is first.

Send Completed Form to: Department of Environmental Quality  
UST Program - Decommissioning Checklist  
811 S.W. Sixth Ave.  
Portland, Oregon 97204

I have personally reviewed this decommissioning checklist and find it to be true and complete.

Signature: Brian Crockett Date: 2-7-92  
(Licensed Supervisor)

Signature: Daniel J. Stutz Date: 2/26/92  
(Owner or Operator)

For information: (503) 229-5559 or Toll Free in Oregon 1-800-452-4011

Department of Environmental Quality

**RECEIVED**

MAR 3 1985

U.S. Compliance Section

\* MUST BE SUBMITTED 30 DAYS IN ADVANCE OF DECOMMISSIONING \*  
**NOTICE OF UNDERGROUND STORAGE TANK  
 PERMANENT DECOMMISSIONING**

*NWR  
sent 6-14-91*

**Facility**  
 Name LOUIS DREYFUS  
 Address Ft. of North Holladay  
Portland, Oregon 97227  
 Phone 232-0127  
 Facility ID Number 6714

**Tank Owner**  
 Name SAME  
 Address \_\_\_\_\_  
 Phone \_\_\_\_\_  
 Dept. of Environmental Quality  
**RECEIVED**  
 JUN 17 1991

**Permanent Decommissioning Performed By:**

Company PEMCO Phone 283-2151  
 Scheduled Date for Permanent Decommissioning 7/15/91  
 Method to be used: Removal  In-Place  Fill Material \_\_\_\_\_

NORTHWEST REGION

**Tanks to be Decommissioned**

Tank ID#	PERMIT #	Tank Size	Last Product Stored
6714-1	AHED	6,000 gal	Gasoline
6711-2	AHEE	6,000 gal	Diesel
6714-3	AHEF	6,000 gal	Gasoline

Are the decommissioned tanks to be replaced by new underground storage tanks? Yes  No   
 If yes, please submit a new permit application containing information on the new tanks.

**Where and how will the old tanks be disposed?**

Scrap Name Schnitzer Steel Location Portland, Oregon  
 Landfill Name \_\_\_\_\_ Location \_\_\_\_\_  
 Stored Name \_\_\_\_\_ Location \_\_\_\_\_  
 Other Comment \_\_\_\_\_

Signature Judy Salermo Date 6/12/91  
 ENVIRONMENTAL DIVISION - PEMCO

Return Completed Form To:

Department of Environmental Quality  
 UST Program - Decommissioning Notice  
 811 SW Sixth Ave.  
 Portland, Oregon 97204

Department of Environmental Quality  
**RECEIVED**  
 JUN 14 1991  
 UST Compliance Section

For Information: Contact your local region office (phone numbers are listed on reverse) or dial 1-800-452-4011

Dept of Environmental Quality  
**RECEIVED**  
JUN 17 1991

# Oregon

Date: 6-14-91

Facility ID No.: 6714

DEPARTMENT OF  
ENVIRONMENTAL  
QUALITY

Dear Tank Owner/Permittee:

NORTHWEST REGION

We received a decommissioning notice on 6-14-91 for 3 underground storage tank(s) located at:

Et. of North Holladay  
Portland, Oregon 97227

The following marked paragraphs apply to this situation:

\_\_\_\_\_ Checking our records, it appears the tanks are registered, permit fees are current, and the contractor is licensed. You are required to confirm the date of removal with the appropriate regional office (see other side) at least 72 hours prior to tank removal.

\_\_\_\_\_ New tank(s) to be installed. Permits for the new tank(s) must be obtained and permit fees paid prior to installation. An application is enclosed. Contact the UST Compliance Section at (503) 229-5733 for more permit applications or installation information. Once the permit has been issued, you may proceed with installation. You are required to confirm the date of installation with the appropriate regional office (see other side) at least 72 hours in advance.

\_\_\_\_\_ There are apparently some discrepancies between our records and the information on your decommissioning form. The following concerns must be resolved BEFORE decommissioning can proceed:

- \_\_\_\_\_ Inadequate information to identify tanks.
- \_\_\_\_\_ One or more of the tanks are not permitted.
- \_\_\_\_\_ Permit fees for 1988 1989 1990 1991 are past due.
- \_\_\_\_\_ The contractor you have identified is not licensed.

Please contact the UST Compliance Section at (503) 229-5733 to provide them with the additional tank identification information, to obtain details on which tanks need to be permitted and permit application forms, to arrange payment of fees (\$25 per tank per year), and/or to receive a list of licensed contractors.



811 SW Sixth Avenue  
Portland, OR 97204-1390  
(503) 229-5696



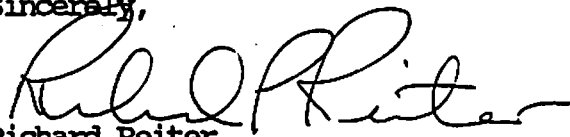
\_\_\_\_\_ Your intent to fill the tank in place requires that the tank area be assessed prior to filling. A sampling plan must be submitted and approved prior to starting the work. Contact the appropriate regional office (see below) if you have any questions concerning this requirement.

Failure to resolve any of the discrepancies before proceeding with decommissioning or tank installation may be a violation of the Department's regulations and may be subject to enforcement. Your cooperation in resolving any potential problems in a timely manner is appreciated.

An assessment must be conducted at all tank sites and contamination must be reported within 24 hours of discovery. OAR 340-122-301 through -360 contains the sampling requirements necessary when decommissioning underground storage tanks. As soon as contamination is identified in any manner, including observations of visible staining or odors, it must be reported. If obvious signs of contamination are present in the excavation, DO NOT wait until you receive the sample results to report the contamination.

If you need to report contamination or have any general questions regarding site cleanup or UST compliance issues, please contact the appropriate regional office at the numbers listed below.

Sincerely,

  
Richard Reiter  
Manager  
UST Compliance Section

cc: NWR Regional Office

Eastern Region, 276-4063  
Central Region, 388-6146  
Toll-free (call back) for  
all regions, 1-800-452-4011

Northwest Region, 229-5263  
Southwest Region, 776-6010  
Willamette Valley Region 378-8240

## UST PULL LOG

Date: 12-27-91 Time: 8:30 AM Expected Pull Date: 12-31-91Person/Company Pulling tank: Pemco Jim Park 1-1-92Phone: 283-2151Business Name/Owner: Louis Dreyfus Corp. Phone: 232-0127Address of Tank Site: 1007 N Holiday St.  
PORTLANDFacility I.D. #: 6714

Tank I.D. No.	No. of Tanks	Size of Tanks	Contents of Tank
<u>6714-1</u>	<u>1</u>	<u>6000</u>	<u>gas</u>
<u>6714-2</u>	<u>1</u>	<u>6000</u>	<u>diesel</u>
<u>6714-3</u>	<u>1</u>	<u>1000</u>	<u>gasoline</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Karen

Department of Public Health

Sanitary Survey

1911

Sanitary Survey

Sanitary Survey

Sanitary Survey

Sanitary Survey

Sanitary Survey

# CROSS - REFERENCE INFO.

Facility Name: Louis Dreyfus Grain Elevators

address: Foot of N. Holladay St.

Portland, OR 97227

See also LUST # 26-92-1

See also facility VST # 6714

30 day notice

3 day notice

Checklist

Service chng Rpt.

} reporting no  
contamination  
found.

\* make copy - place one in LUST file and  
one in VST file.

Date: January 29, 1992

Responsible Person: Dave Slutz

Site Name: Louis Dreyfus

Site Address: Foot of N. Holladay

Mailing Address: PORTLAND OR 97227 1800 S.W. First Ave. 97201  
(if different)

DEPARTMENT OF ENVIRONMENTAL QUALITY

USTC Log Number: 26-92-001

Facility ID No.: 6714

We have received the report which you submitted concerning the decommissioning and/or cleanup of petroleum contamination associated with underground storage tanks. Our initial review of this report indicates that the following additional information and/or documentation is needed:

- A completed Matrix Checklist
- A completed Matrix Score Sheet
- Copies of chain of custody forms for all samples
- Copies laboratory reports for all samples

Copies of receipts or permits related to disposal, treatment, or recycling of:

- Free product
- Contaminated soil
- Sludge
- Tanks and Piping
- Contaminated water

A site sketch which clearly shows the locations of all samples

For waste oil contamination, analytical results for:

- BTEX
- Cr, Cd, & Pb by TCLP Method
- PCB's
- Halogenated organics

- Copy of Decommissioning Checklist
- Copy of Decommissioning Report

Please submit the required information within two weeks of receipt of this letter. This information will help us to complete our review of the your cleanup activities. However, you should be aware that more specific information may be requested at a later date, if further review reveals that it is required.

The Department appreciates your cooperation in complying with the underground storage tank regulations. If you have any questions regarding this matter, please contact the Northwest Region at (503) 229-5263.

- cc: UST Cleanup Section, ECD (if cleanup related)
- UST Compliance Section, HSW (if UST related)
- NWR file

Service Provider: Penaco

437 N COLUMBIA BLVD  
PO BOX 11569  
PORTLAND OR 97211



811 SW Sixth Avenue  
Portland, OR 97204-  
(503) 229-5696

----- Contacts -----  
Permitee: Name Arnie Schaufler  
Organization Louis Dreyfus Corp.  
Address1 1800 SW 1st Ste 650  
Address2  
City, ST Zip Portland OR 97201-5512  
Phone1 (503) 243-1133

Owner: Name Arnie Schaufler  
Organization Louis Dreyfus Corp.  
Address1 1800 SW 1st Ste 650  
Address2  
City, ST Zip Portland OR 97201-5512  
Phone1 (503) 243-1133

Property Owner: Name Arnie Schaufler  
Organization Louis Dreyfus Corp.  
Address1 1800 SW 1st Ste 650  
Address2  
City, ST Zip Portland OR 97201-5512  
Phone1 (503) 243-1133

August 13, 1992

NORTHWEST REGION

ARNIE SCHAUFLE  
LOUIS DREYFUS CORPORATION  
1800 SW FIRST SUITE 650  
PORTLAND OR 97201-5512

Re: Louis Dreyfus  
Facility ID #6714  
NWR-UST-92-348  
NOTICE OF NONCOMPLIANCE

Dear Mr Schaufler:

On March 3, 1992, the Department received an Underground Storage Tank (UST) Decommissioning/Service Change Report and Checklist from PEMCO for an UST decommissioning project reported to be completed on January 20, 1992 at the Louis Dreyfus facility located at the foot of North Holladay in Portland. The Report and Checklist report that no contamination was found. However, no laboratory reports showing the results of tests on soil and water samples collected during the required site assessment were attached. In addition, an UST release was reported to the Department for this facility on January 2, 1992 (file #26-92-001).

40 CFR 280.71 (b) states:

the [tank] owner and operator or licensed service provider shall provide a completed decommissioning checklist to the [Department] within 30 days after tank closure.

Failure to submit required reports from the investigation and cleanup of a release from an underground storage tank is a Class I violation, and considered a serious violation of Oregon's UST regulations. The Department has conflicting information on the decommissioning project. On January 2, 1992, a release was reported to the Department; but a release was not reflected in the Checklist submitted for the project.



1500 SW First Avenue  
Suite 750  
Portland, OR 97201-5884  
(503) 229-5263

DEQ-1

Schaufler  
August 13, 1992  
Page 2

Please accurately complete the enclosed Report and Checklist, with all appropriate attachments, and return by August 27, 1992. If we do not receive the documents by this date, we will refer this violation to the Department's Enforcement section for formal enforcement which may include a civil penalty assessment. If you have any questions regarding this matter, please contact me at (503) 229-6385, ext. 247.

Sincerely,



Julie E. Magers  
UST Compliance Specialist  
Northwest Region

cc: Enforcement Section, RO  
UST Compliance Section, HSW-Dennis Thomason  
Judy Palermo  
PEMCO  
PO Box 11569  
Portland, OR 97211

fac. #6714

Oregon

DEPARTMENT OF ENVIRONMENTAL QUALITY

Northwest Region  
1500 SW First Avenue, Suite 750  
Portland, OR 97201-5884

DEQ-3A

Address Correction Requested



NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD



DEPT OF ENVIRONMENTAL QUALITY  
RECEIVED  
AUG 24 1992  
NORTHWEST REGION

cc: Enforcement  
UST Compliance  
Judy Palermo  
PEMCO  
PO Box 11569  
Portland, OR 97211

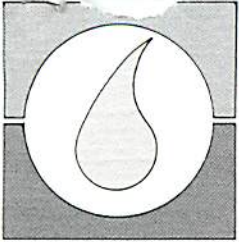
August 25, 1992

Arnie:

Per our telephone conversation this morning, I will not expect a reply by August 27, due to the mail not being delivered to you by the post office. However, I expect that you will contact PEMCO and respond to me regarding the described discrepancies. Please do so within two weeks from today, September 8, 1992. If you have any questions, do not hesitate to call.

Thank you.

Julie Wagers



PEMCO

437 N. Columbia Blvd.  
P.O. Box 11569  
Portland, Oregon 97211  
Office (503) 283-2151  
FAX (503) 283-6388

DEPT OF ENVIRONMENTAL QUALITY  
RECEIVED

SEP 04 1992

NORTHWEST REGION

August 27, 1992

Department of Environmental Quality  
1500 S.W. First Avenue  
Portland, Oregon 97201-5884

Attn: Julie E. Magers

Response to NON

Louis Dreyfus Facility

UST ID # 6714

LUST # 26-92-001

RE: Re-submittal of Service Change Report and UST Decommissioning Check List (including receipts-maps-laboratory results)

Dear Ms. Magers:


Enclosed is a copy of the above referenced items that the Department requested in their 8/13/92 Notice of Non-Compliance. It is hoped that our 8/18/92 phone conversation and this information will clear up any conflict the Department has with respect to this site.

A copy of the revised information will also be forwarded to Mr. Dan Stutz of the Louis Dreyfus Corporation.

If you have any additional questions with regard to this matter, please feel free to call.

Sincerely,

PEMCO

  
Brad Harris  
Staff Geologist

cc: Dan Stutz

Oregon Department of Environmental Quality  
**UNDERGROUND STORAGE TANK DECOMMISSIONING/SERVICE CHANGE REPORT**

DEQ FACILITY NUMBER: 6714

DATE: 8/27/92  
revised

FACILITY NAME: Louis Dreyfus

FACILITY ADDRESS: Foot of N. Holladay  
Portland, OR 97227

PHONE: 232-0127

The following information **MUST** be submitted by the underground storage tank owner, operator or licensed DEQ Supervisor within 30 days following completion of the tank decommissioning or changing tank contents to a non-regulated substance. (OAR 340-150-001 through -150)

The attached supplemental checklist should be prepared by the person performing the decommissioning. The checklist should be provided to DEQ and the tank owner to demonstrate that all required practices were followed.

Ordinarily the checklist is filled out by the DEQ licensed Service Provider or Supervisor. Owners who wish to personally decommission a tank must follow all DEQ and other applicable standards. The owner should contact the DEQ Regional Office prior to starting the decommissioning to receive current copies of underground storage tank regulations.

**A. DATES:**

Decommissioning/Service Change Notice - Date Submitted: 6/12/91 (30 days before work starts)

Work Start Telephone Notice - Date Submitted: 12/27/91 (3 working days before work starts)

DEQ Person Notified: Loren Garner

Date Work Started: 12/31/91

Date Work Completed: 1/20/92

Note: Provide the following information if any soil or water contamination is found during the decommissioning. Contamination must be reported by the UST owner or operator within 24 hours. The licensed service provider must report contamination within 72 hours after discovery unless previously reported.

Date Contamination Reported: 1/2/92 By: BRAD HARRIS

DEQ Person Notified: Loren Garner

Backfill Telephone Notice - Date Called: 1/4 (before backfilling)

DEQ Person Notified: \_\_\_\_\_

**B. PERMITS:**

Note: DEQ permits or an addendum to the UST permit(s) may be needed where soil or water cleanup is required.

DEQ Water Discharge Permit #: N/A Date: \_\_\_\_\_

Disposed to (Location): no contamination detected in analyses

DEQ Solid Waste Disposal Permit #: N/A Date: \_\_\_\_\_

**B. PERMITS (Continued)**

UST Soil Treatment Permit Addendum - Type: N/A Date: \_\_\_\_\_

Soil Disposal or Treatment Location: N/A

**C. TANK INFORMATION:**

Tank #	DEQ UST Permit	Tank Size in (Gallons)	Product: Gasoline, Diesel, Used Oil, Other?		Closure or Service Change?			Tank to be Replaced?	
			Present	New	Tank Removal	Closure <sup>∞</sup> Inplace	New <sup>∞</sup> Product	Yes*	No
674 1	AHEE	1000	Gas		X				X
671 2	AHEE	6000	Diesel		X				X
674 3	AHEE	6000	Gas		X				X

\* Where decommissioned tank(s) are replaced by new underground storage tanks the UST owner or operator must submit a new permit application containing information on the new tanks 30 days before placing them in service.

∞ Submit a soil sampling plan to the DEQ regional office and receive plan approval prior to starting work if 1) tank is to be decommissioned in-place, 2) tank contents are changed to a non-regulated substance, or 3) tank contains a regulated substance other than petroleum.

**D. DISPOSAL INFORMATION:**

Tank #	Tank & Piping Disposal Method				Disposal Location of Tank Contents *	
	Scrap	Land-fill	Other	Identify Location & Property Owner	Liquids	Sludges
1	X			Oregon Pacific Steel Portland, OR	Western Compliance 11330 SW Clay St. Sherwood, OR	
2	X			Oregon Pacific Steel Portland, OR	Sun West Energy Corp 2601 N Newberry Ave. Portland, OR	
3	X			Oregon Pacific Steel Portland, OR	Western Compliance 11330 SW Clay St. Sherwood, OR	

\* Note: The tank contents, the tank and the piping may be subject to the requirements of Hazardous Waste regulations. If you have questions, contact the DEQ Hazardous Waste Section at (503) 229-5913 or DEQ regional office hazardous waste staff.

**E. CONTAMINATION INFORMATION:**

Tank #	Ground* water in pit?	Product odor in soil?	Product stains in soil?	Number of Samples	Laboratory (Name, City, State, Phone)
1	No	No	No	2	PEL - Beaverton, OR 97005 644-0660
2	No	No	No	2	
3	No	No	No	2	
Stack pile				3	

\* Note: Sampling is required if groundwater is encountered. See cleanup rules.

**F. SITE SKETCH:**

(Show location of adjacent roads, property lines, structures, dispenser, & all USTs) (Show North, general direction of ground slope and soil sample locations. Sketch does not need to be drawn to scale. You may attach a separate drawing.)

**G. WORK PERFORMED BY:**

DEQ Service Provider's License #: 10534 Construction Contractors License #: 43740

Name: PEMCO

Telephone: 283-2151

DEQ Decommissioning Supervisor's License #: 10391

Name: Brian Crockett

Telephone: 283 2151

DEQ Soil Matrix Service Provider's License #: \_\_\_\_\_ (If applicable)

Name: \_\_\_\_\_

Telephone: \_\_\_\_\_

DEQ Soil Matrix Supervisor's License #: \_\_\_\_\_ (If applicable)

Name: \_\_\_\_\_

Telephone: \_\_\_\_\_

**H. ATTACHMENTS TO THIS REPORT:**

1. Attach a copy of the laboratory report showing the results of all tests on all soil and water samples. The laboratory report must identify sample collection methods, sample location, sample depth, sample type (soil or water), type of sample container, sample temperature during transportation, types of tests, and copies of analytical laboratory reports, including QA/QL information. Include laboratory name, address and copies of chain-of-custody forms.

2. If contamination is detected and a Level 2 or Level 3 soil matrix cleanup standard is selected attach a copy of the soil matrix analysis for the site including methods of determining soil type, depth to groundwater, and sensitivity of uppermost aquifer.

**I. REPORT FILING:**

This report, signed by the tank owner or operator, complete with all applicable attachments must be filed with DEQ headquarters within 30 days after the excavation is backfilled or change-in-service is complete. Contact the DEQ regional office prior to filing this report where special circumstances exist at the site (such as water in pit, remaining pockets or contamination, etc.).

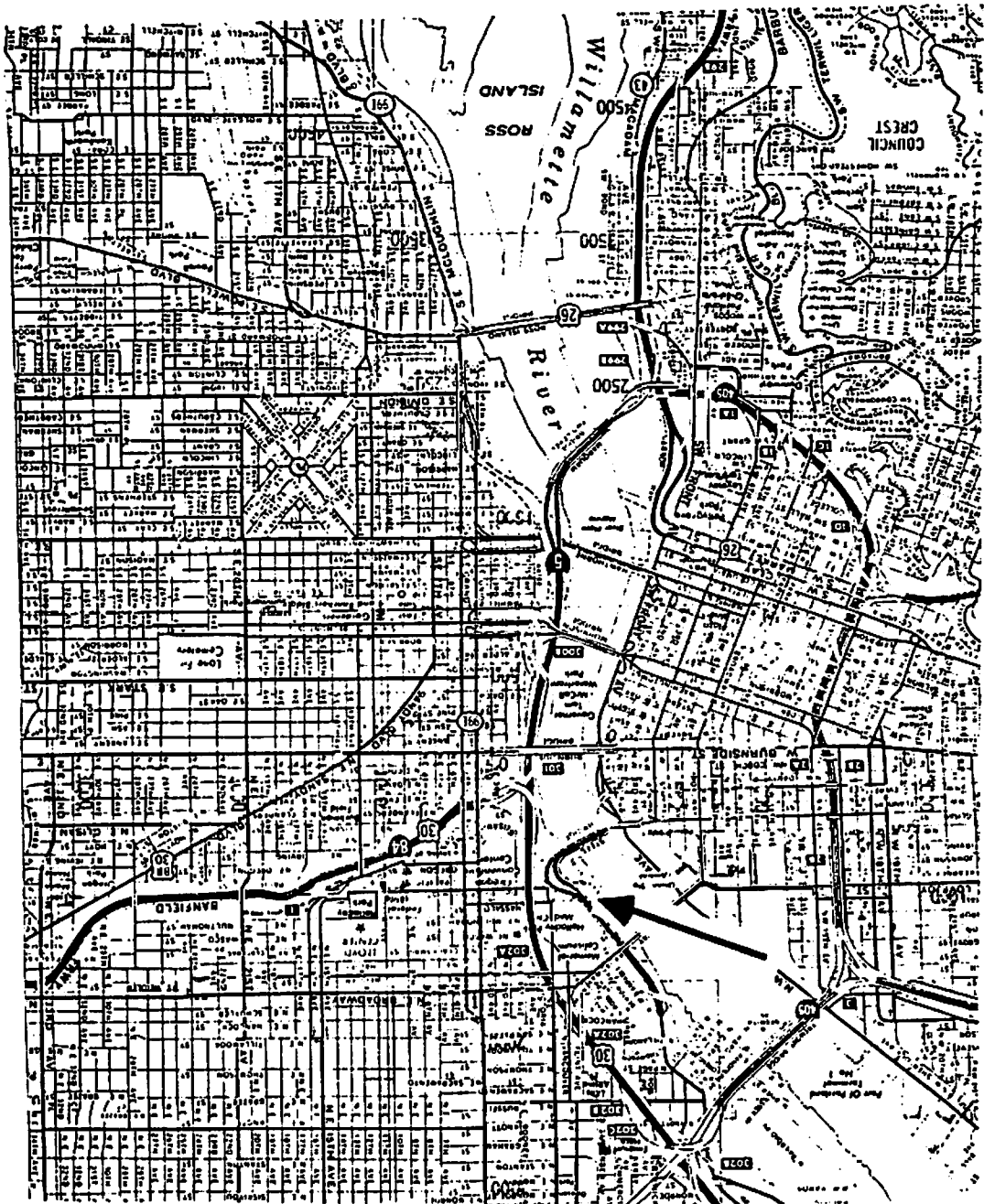
**NOTE:** If contamination was found during site assessment at decommissioning or change-in-service and reported to DEQ regional office, this report may be submitted with either the first interim cleanup report or the final cleanup report, whichever is first.

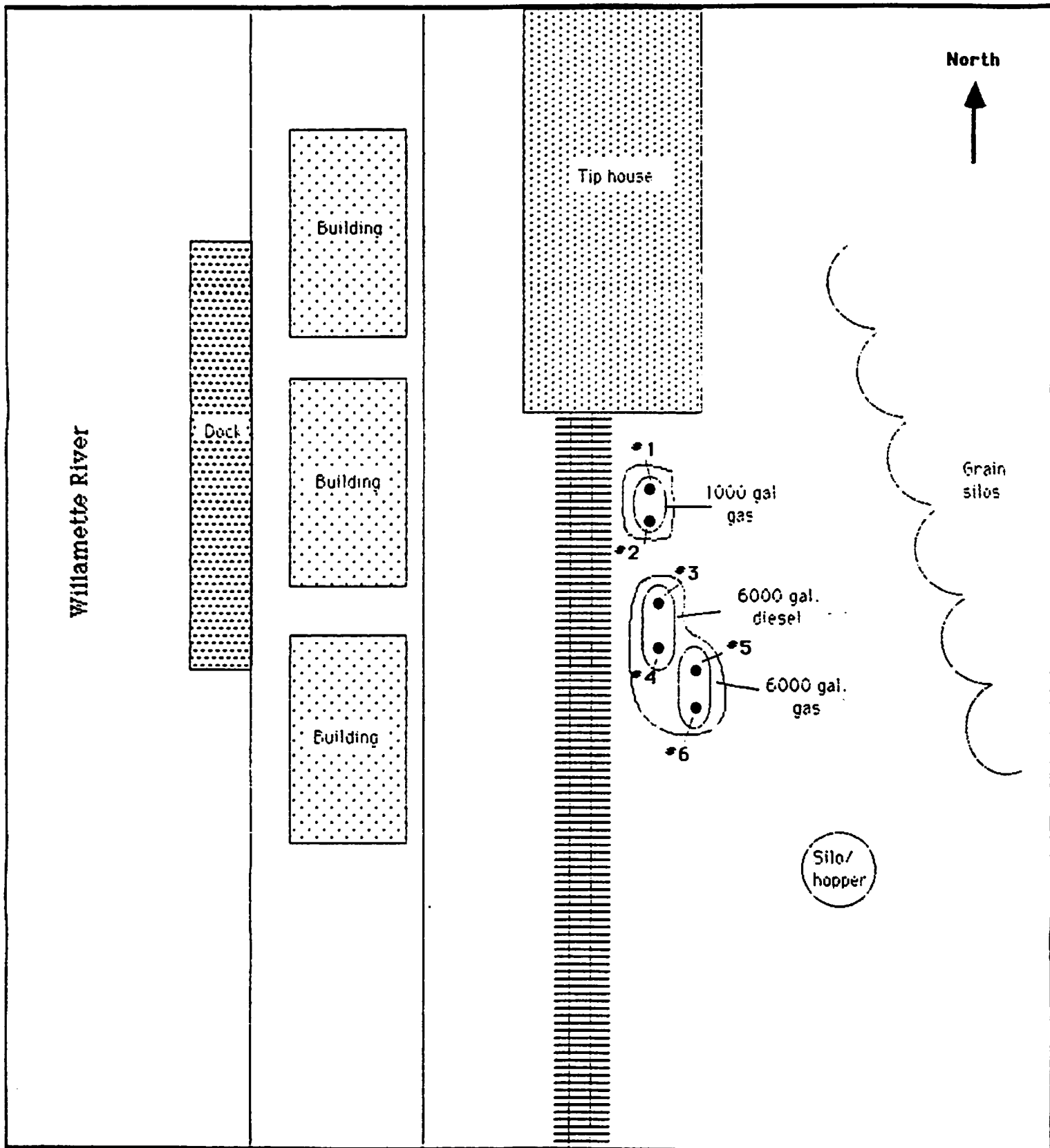
Return Completed Form to: Department of Environmental Quality  
UST Program - Decommissioning Report  
811 S.W. Sixth Ave.  
Portland, Oregon 97204

I have personally reviewed this report and the attachments and find them to be true and complete.  
Signature: Bill Rauter for Louis Dreyfuss Date: 9/3/92  
(Owner or Operator)

For information: (503) 229-5733 or Toll Free in Oregon 1-800-452-4011


# Location Map





Louis Dryfus  
 Ft. of N. Holladay  
 Portland, OR  
 Site Map 1

● Samples collected 12/31/91

	<b>PEMCO</b>
Job #3177	
Date: 1/6/92	
Gail K. Wayper	



# PEMCO

437 N. COLUMBIA BLVD.  
 P.O. BOX 11569  
 PORTLAND, OR 97217  
 (503) 283-2151

## CHAIN OF CUSTODY

PROJ. NO.  3177	PROJECT NAME: LOUIS DRYEUS	SAMPLER GREG MORAN	ANALYSIS TYPE REQUESTED:																		
	ADDRESS: FOOT OF N HOLLADAY		TPH-HCD	TPH-G	TPH-D	TPH(418.1M)	EPA 418.1	BTEX	602/8020	PAH (8310)	Total Pb (7421)	EDB & EDC (8010)	TCLP (8 mm)	TCLP (3 mm)	PCB's	608/8080	Chlor. Solv.	601/8010	VOC's 8240	BTEX, VPH	3810 Modified

SAMPLE NUMBER	DATE	TIME	WATER	SOIL	ICED	SAMPLE LOCATION TANK SIZE TANK PRODUCT	DEPTH	TPH-HCD	TPH-G	TPH-D	TPH(418.1M)	EPA 418.1	BTEX	602/8020	PAH (8310)	Total Pb (7421)	EDB & EDC (8010)	TCLP (8 mm)	TCLP (3 mm)	PCB's	608/8080	Chlor. Solv.	601/8010	VOC's 8240	BTEX, VPH	3810 Modified	Fluorpt (1010)	TOX	
1	12/31/91	1045		X	X	TANK # 1 1,000 GAS NORTH FLOOR	9'	X																					
2	12/31/91	1050		X	X	TANK #1 1,000 GAS SOUTH FLOOR	9'	X																					
3	12/31/91	1230		X	X	TANK # 2 6,000 DIESEL NORTH FLOOR	11	X																					
4	12/31/91	1235		X	X	TANK #2 SOUTH FLOOR	11	X																					
5	12/31/91	2:10		X	X	TANK #3 6,000 GAS NORTH FLOOR	12	X																					
6	12/31/91	2:15		X	X	TANK #3 SOUTH FLOOR	12	X																					

Relinquished by: <i>[Signature]</i>	Date 12/31/91	Time 5:00	Received by: <i>[Signature]</i>	RUSH: YES <input type="radio"/> NO <input checked="" type="radio"/>
Relinquished by: <i>[Signature]</i>	1/2/92	1615	<i>[Signature]</i>	
Relinquished by:				

LAB #  
92-0005



PACIFIC  
ENVIRONMENTAL  
LABORATORY INC.

9405 S.W. Nimbus Ave. Beaverton, OR 97005 (503) 644-0660  
FAX # (503) 644-2202

RECEIVED

JAN 09 1992

As'd.....

January 7, 1992

PEMCO  
P.O. Box 11569  
Portland, OR 97211

Attn: Bill Knutson

Re: JOB #3177  
PROJECT - LOUIS DREYFUS  
PEL #92-0005

Enclosed is the lab report for your samples which were received on January 2, 1992.

### I. Sample Description

#### Six Soil Samples

The samples were received under a chain of custody.

The samples were received in containers consistent with EPA protocol.

### II. Quality Control

No project specific QC was requested. In-house QC data is available upon request.

### III. Analytical Results

Test methods may include minor modifications of published methods such as detection limits or parameter lists. Solid and waste samples are reported on an "as received" basis unless otherwise noted.

Compounds not detected are listed under results as ND.

Sincerely,

Howard Holmes  
Lab Manager

Howard Boorse  
QA/QC Manager



PEL REPORT NUMBER: 92-0005  
 CLIENT: PEMCO  
 JOB REFERENCE: 3177  
 PROJECT: LOUIS DREYFUS  
 DATE: January 7, 1992  
 ITEMS: Six Soil Samples

METHOD: TPH-HCID per Oregon DEQ  
 Detection limits in mg/kg (ppm)

<u>Sample I.D.</u>	<u>Gasoline</u>	<u>Diesel</u>	<u>Bunker/ Related</u>
TANK #1 NORTH FLOOR	ND	ND	ND
TANK #1 SOUTH FLOOR	ND	ND	ND
TANK #2 NORTH FLOOR	ND	ND	ND
TANK #2 SOUTH FLOOR	ND	ND	ND
TANK #3 NORTH FLOOR	ND	ND	ND
TANK #3 SOUTH FLOOR	ND	ND	ND
Lab Blank	ND	ND	ND
Detection Limit	20	50	--

TPH-HCID Surrogate Recoveries (%)

<u>Sample I.D.</u>	<u>1-chlorooctadecane (50-150%)</u>
TANK #1 NORTH FLOOR	95
TANK #1 SOUTH FLOOR	96
TANK #2 NORTH FLOOR	97
TANK #2 SOUTH FLOOR	96
TANK #3 NORTH FLOOR	98
TANK #3 SOUTH FLOOR	97
Lab Blank	99



# PEMCO

437 N. COLUMBIA BLVD.  
 P.O. BOX 11569  
 PORTLAND, OR 97217  
 (503) 283-2151

## CHAIN OF CUSTODY

PROJ. NO. 3177	PROJECT NAME: <i>Louis Dreyfus Corp.</i>	SAMPLER <i>READ</i> <i>HARRIS</i>	ANALYSIS TYPE REQUESTED:																		
	ADDRESS: <i>East of N Holladay PHU. OR</i>		TPH-HCB	TPH-G	TPH-D	TPH(418.1M)	EPA 418.1	BTEX	602/8020	PAH(8310)	Total Pb (7421)	EDB & EDC (8010)	TCLP(8 met)	TCLP(3 met)	PCB's	608/8080	Chlor. Solv.	601/8010	YOC's 8240	BTEX, VPH	3910 Modified

SAMPLE NUMBER	DATE	TIME	WATER	SOIL	ICED	SAMPLE LOCATION TANK SIZE TANK PRODUCT	DEPTH	TPH-HCB	TPH-G	TPH-D	TPH(418.1M)	EPA 418.1	BTEX	602/8020	PAH(8310)	Total Pb (7421)	EDB & EDC (8010)	TCLP(8 met)	TCLP(3 met)	PCB's	608/8080	Chlor. Solv.	601/8010	YOC's 8240	BTEX, VPH	3910 Modified	Flashpt (1010)	TOX		
1	1/2/92	4:00		X	X	Stockpile Tank #1	N/A	X																						
2	1/2/92	4:10		X	X	Stockpile Tank #2	N/A	X																						
3	1/2/92	4:15		X	X	Stockpile Tank #3	N/A	X																						

Relinquished by: <i>[Signature]</i>	Date: <i>1/6/92</i>	Time: <i>1340</i>	Received by: <i>[Signature]</i>	RUSH: YES <input type="radio"/> NO <input checked="" type="radio"/>
Relinquished by:				
Relinquished by:				

LAB #  
*92-0029*



PACIFIC  
ENVIRONMENTAL  
LABORATORY INC.

January 13, 1992

PEMCO  
P.O. Box 11569  
Portland, OR 97211

Attn: Bill Knutson

Re: JOB #3177  
PROJECT - Louis Dreyfus Corp.  
PEL #92-0029

RECEIVED  
JAN 15 1992  
Lab.....

Enclosed is the lab report for your samples which were received on January 6, 1992.

#### I. Sample Description

##### Three Soil Samples

The samples were received under a chain of custody.

The samples were received in containers consistent with EPA protocol.

#### II. Quality Control

No project specific QC was requested. In-house QC data is available upon request.

#### III. Analytical Results

Test methods may include minor modifications of published methods such as detection limits or parameter lists. Solid and waste samples are reported on an "as received" basis unless otherwise noted.

Compounds not detected are listed under results as ND.

Sincerely,

Howard Holmes  
Project Manager

Rob May  
Project Manager



METHOD: TPH-HCID per Oregon DEQ  
Detection limits in mg/kg (ppm)

<u>Sample I.D.</u>	<u>Gasoline</u>	<u>Diesel</u>	<u>Bunker/ Related</u>
1	ND	ND	ND
2	ND	ND	ND
3	ND	ND	ND
Lab Blank	ND	ND	ND
Detection Limit	20	50	--

TPH-HCID Surrogate Recoveries (%)

<u>Sample I.D.</u>	<u>1-chlorooctadecane (50-150%)</u>
1	84
2	88
3	87
Lab Blank	86

**Oregon Department of Environmental Quality  
UNDERGROUND STORAGE TANK DECOMMISSIONING CHECKLIST**

DEQ FACILITY NUMBER: 6714 DATE: 8/27/92  
revised

FACILITY NAME: Louis Dreyfus

FACILITY ADDRESS: Foot of N. Holladay  
Portland, OR 97227

PHONE: 232-0127

**A. SAFETY EQUIPMENT ON JOB SITE:**

Fire Extinguisher: Type/Size: CO<sub>2</sub>/2016 Recharge Date: 12/91

Combustible Gas Detector: Model: PHd Calibration Date: 12/31

Oxygen Analyzer: Model: \_\_\_\_\_ Calibration Date: \_\_\_\_\_

**B. DECOMMISSIONING: All Tanks: (Unk. = Unknown, N/A = Not Applicable)  
(Check Appropriate Box)**

1. All electrical equipment grounded and explosion proof?
2. Safety equipment on job site?
3. Overhead electrical lines located?
4. Subsurface electrical lines off or disconnected?
5. Natural gas lines off or disconnected?
6. No open fires or smoking material in area?
7. Vehicle and pedestrian traffic controlled?
8. Excavation material area cleared?
9. Rainwater runoff directed to treatment area?
10. Drained and collected product from lines?
11. Removed product and residual from tank?
12. Cleaned tank?
13. Excavated to top of tank?
14. Removed tank fixtures? (pumps, leak detection equip.)
15. Removed product, fill and vent lines?

Yes	No	Unk	N/A
X			
X			
X			
X			
X			
X			
X			
			X
X			
X			
X			
X			
X			
X			

**C. TANK ABANDONMENT IN-PLACE:**

16. Sampling plan approved by DEQ?  
 Date: \_\_\_\_\_ DEQ Staff: \_\_\_\_\_

	X		X
--	---	--	---

**B. DECOMMISSIONING: All Tanks: (Unk. = Unknown, N/A = Not Applicable)  
(Check Appropriate Box)**

- 17. Contamination concerns fully resolved?
- 18. Fill Material? Type: 1" Crushed

Yes	No	Unk	N/A
X			
X			

**D. TANK REMOVAL:**

- 19. Tank placement area cleared, chocks placed?
- 20. Purged or ventilated tank to prevent explosion?  
Method used: forced air ventilation Meter reading: 20% O2
- 21. No chains or steel cables wrapped around tank for removal?
- 22. Tank removed, set on ground, blocked to prevent movement?
- 23. Tank set on truck and secured with strap(s)?
- 24. Tank labeled before leaving site?

X			
X			
X			
X			
X			

**E. SITE ASSESSMENT:**

- 25. Site assessed for contamination? See OAR 340-122-340
- 26. Soil samples taken and analyzed?
- 27. Decommissioning/Change-in-Service report sent to DEQ?
- 28. Was contamination found? Date/Time: Yes/No 1/2/92 (ref. 1/24/92 report)
- 29. Was contamination reported to DEQ? By: BRAD HARRIS  
Date/Time: 1/2/92 DEQ Staff: Loren Gerner
- 30. Was hazardous waste determination made for tank contents (Liquids/sludges)?

X			
X			
X			
X	X		
X			
X			

- 31. Disposal location of tank(s) contents.  
Name: WESTERN Corp. / Sunwest  
Address: Steensand OR / Portland OR

Date: 5/28/92 // 3/23/92

Attach disposal receipt.

- 32. Disposal or recycling location of removed tank(s) and associated piping.  
Name: Oregon Pacific Steel  
Address: Portland OR

Date: 12/31/92

Attach disposal receipt.

- 33. If tank(s) are intended to be reused, identify new tank site.  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_

Date: \_\_\_\_\_

Purpose of Reuse: \_\_\_\_\_

**F. WORK PERFORMED BY:**

DEQ Service Provider's License #: 10534  
Name: PEMCO  
Telephone: 283 2151

DEQ Decommissioning Supervisor's License #: 10391  
Name: Brian Crolett  
Telephone: 283-2151

**E. CHECKLIST FILING:**

1. Provide copy of checklist to the UST owner and operator.
2. Send completed checklist to the DEQ headquarters within 30 days after the excavation is backfilled.

**NOTE:** If contamination was found during decommissioning and reported to DEQ regional office, this report may be submitted with either the first interim cleanup report or the final cleanup report, whichever is first.

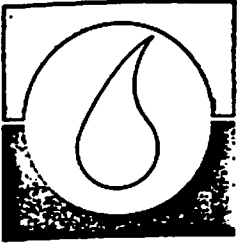
Send Completed Form to: Department of Environmental Quality  
UST Program - Decommissioning Checklist  
811 S.W. Sixth Ave.  
Portland, Oregon 97204

I have personally reviewed this decommissioning checklist and find it to be true and complete.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
(Licensed Supervisor)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
(Owner or Operator)

For information: (503) 229-5559 or Toll Free in Oregon 1-800-452-4011



**PEMCO**

437 N. Columbia Blvd.  
P.O. Box 11569  
Portland, Oregon 97211  
Office (503) 283-2151  
FAX (503) 283-6388

**CERTIFICATION OF TANK DISPOSAL**

DATE: 12/31/91

JOB NUMBER: 3177

LOCATION FROM WHICH REMOVED: Louis Dreyfus

<u>QUANTITY</u>	<u>SIZE</u>	<u>LAST KNOWN PRODUCT</u>
<u>2</u>	<u>6,000</u>	<u>Gas</u>
<u>1</u>	<u>1,000</u>	<u>Gas</u>

Pemco 12-31-91 Date

GROSS #1 29,180 Lbs. No. on Scale 1

GROSS #2 26,360 Lbs.

TOTAL 28,200 Lbs. Per GROSS NET Ton

OREGON PACIFIC STEEL & METAL CO.

1/2 Quality Pricing Centre • (503) 286-4151

Pemco Pem 12-31-91 Date

GROSS #1 31,720 Lbs. No. on Scale \_\_\_\_\_

GROSS #2 9,100 Lbs.

TOTAL 39,200 Lbs. Per GROSS NET Ton

OREGON PACIFIC STEEL & METAL CO.

1/2 Quality Pricing Centre • (503) 286-4151

TRANSPORT DRIVER: [Signature]

RECEIVING SCRAP YARD: Oregon Pacific Steel

RECEIVED BY: [Signature]

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		Generator's US EPA ID No. <b>OR D02773687</b>		Manifest Document No. <b>592134</b>	Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <b>Louis Dreyfus Corporation 1800 SW First Ave., STE. 650 Portland, OR 97201-</b>					A. State Manifest Document Number		
4. Generator's Phone (503) 232-0127					B. State Generator's ID		
5. Transporter 1 Company Name <b>PEMCO</b>		6. US EPA ID Number <b>OR D987191251</b>		C. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (503) 283-2151			
9. Designated Facility Name and Site Address <b>DWestern Compliance Services, Inc. 11330 SW Clay St. Sherwood, OR 97140</b>		10. US EPA ID Number <b>OR D980981682</b>		E. State Transporter's ID			
				F. Transporter's Phone			
				G. State Facility's ID			
				H. Facility's Phone (503) 682-2341			
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)					12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. <b>RM</b> Waste Flammable Liquid, N.O.S. (Lead, Benzene) Flammable Liquid UN1993					002	DMO	60 G*G*
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above a. Profile #BB8630 ERG #27 <i>estimated</i>					K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information <b>Contain and absorb all spills. Keep away from waterways and ignition sources. In case of emergency call (503) 283-2151</b>							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name <b>Don Stutz</b>				Signature <i>Don Stutz</i>		Month Day Year <b>1 15 1992</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name <b>G. Allen Foster</b>				Signature <i>G. Allen Foster</i>		Month Day Year <b>1 15 1992</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name <b>David Dempree</b>				Signature <i>David Dempree</i>		Month Day Year <b>1 15 1992</b>	

**NON-HAZARDOUS WASTE MANIFEST**

1. Generator's US EPA ID No. *N/A*

Manifest Document No. *03177*

2. Page 1 of 1

3. Generator's Name and Mailing Address  
*Louis Dreyfus  
 1800 SW 1st Ave Suite 650  
 Portland, OR 97201*

Site: *Ft. of N. Holladay*

4. Generator's Phone (503) *232-0127*

5. Transporter 1 Company Name  
*PEMCO*

6. US EPA ID Number  
*1ORD987191251*

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address  
*Sunwest Energy Corp.  
 2601 N. Newark  
 Portland, OR 97217*

10. US EPA ID Number  
*1ORD981765571*

A. Transporter's Phone (503) *283-2151*

B. Transporter's Phone

C. Facility's Phone (503) *285-5168*

11. Waste Shipping Name and Description	12. Containers		13. Total Quantity	14. Unit Wt/Vol
	No.	Type		
a. <i>Diesel/water from UST (RCRA Non-hazardous)</i>	<i>0.0.2</i>	<i>DM</i>	<i>0.0.1.1.0</i>	<i>6*</i>
b.	.	.	.	.
c.	.	.	.	.
d.	.	.	.	.

D. Additional Descriptions for Materials Listed Above

E. Handling Codes for Wastes Listed Above  
*1*

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name: *Scott Foutch* Signature: *Scott Foutch* Month Day Year: *03/23/92*

17. Transporter 1 Acknowledgement of Receipt of Materials  
 Printed/Typed Name: *Rodney B. Cooper* Signature: *Rodney B. Cooper* Month Day Year: *03/23/92*

18. Transporter 2 Acknowledgement of Receipt of Materials  
 Printed/Typed Name: Signature: Month Day Year:

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.  
 Printed/Typed Name: *Bruce R. Geis* Signature: *Bruce R. Geis* Month Day Year: *3/23/92*

GENERATOR  
TRANSPORTER  
FACILITY

TRANSPORTER #1

# CROSS - REFERENCE INFO.

Facility Name: Louis Dreyfus Grain Elevators

address: Foot of N. Holladay St.

Portland, OR 97227

See also LUST # 26-92-1

See also facility VST # 6714

30 day notice

3 day notice

Checklist

Service chng Rpt.

} reporting no  
contamination  
found.

\* make copy - place one in LUST file and  
one in VST file.

#26 92 001

UST file  
Oregon

DEPARTMENT OF  
ENVIRONMENTAL  
QUALITY

August 13, 1992

NORTHWEST REGION

JUDY PALERMO  
PEMCO  
PO BOX 11569  
PORTLAND OR 97211

Re: Louis Dreyfus  
Facility ID #6714  
NWR-UST-92-347  
NOTICE OF NONCOMPLIANCE

Dear Ms. Palermo:

On March 3, 1992, the Department received an Underground Storage Tank (UST) Decommissioning/Service Change Report and Checklist from PEMCO for an UST decommissioning project reported to be completed on January 20, 1992 at the Louis Dreyfus facility located at the foot of North Holladay in Portland. The Report and Checklist report that no contamination was found. However, no laboratory reports showing the results of tests on soil and water samples collected during the required site assessment were attached. In addition, an UST release was reported to the Department for this facility on January 2, 1992 (file #26-92-001).

40 CFR 280.71 (b) states:

the [tank] owner and operator or licensed service provider shall provide a completed decommissioning checklist to the [Department] within 30 days after tank closure.

Failure to submit required reports from the investigation and cleanup of a release from an underground storage tank is a Class I violation, and considered a serious violation of Oregon's UST regulations. The Department has conflicting information on the decommissioning project. On January 2, 1992, a release was reported to the Department; but a release was not reflected in the Checklist submitted for the project.



1500 SW First Avenue  
Suite 750  
Portland, OR 97201-5884  
(503) 229-5263  
DEQ-1

Palermo  
August 13, 1992  
Page 2

Please accurately complete the enclosed Report and Checklist, with all appropriate attachments, and return by August 27, 1992. If we do not receive the documents by this date, we will refer this violation to the Department's Enforcement section for formal enforcement which may include a civil penalty assessment. If you have any questions regarding this matter, please contact me at (503) 229-6385, ext. 247.

Sincerely,



Julie E. Magers  
UST Compliance Specialist  
Northwest Region

cc: Enforcement Section, RO  
UST Compliance Section, HSW-Dennis Thomason  
Daniel Stutz, Arnie Schaufler  
Louis Dreyfus Corp.  
1800 SW First, Suite 650  
Portland, OR 97201-5512

Date: January 24, 1992.

Responsible Person: Dave Stute

Site Name: Louis Dreyfus

Site Address: Foot of N. Holladay

Mailing Address: PORTLAND OR 97227  
(if different)

1800 S.W. FIRST AVE. 97201

USTC Log Number: 26-92-001

Facility ID No.: 6714

We have received the report which you submitted concerning the decommissioning and/or cleanup of petroleum contamination associated with underground storage tanks. Our initial review of this report indicates that the following additional information and/or documentation is needed:

- A completed Matrix Checklist
- A completed Matrix Score Sheet
- Copies of chain of custody forms for all samples
- Copies laboratory reports for all samples

Copies of receipts or permits related to disposal, treatment, or recycling of:

- Free product
- Contaminated soil
- Sludge
- Tanks and Piping
- Contaminated water

A site sketch which clearly shows the locations of all samples

For waste oil contamination, analytical results for:

- BTEX
- Cr, Cd, & Pb by TCLP Method
- PCB's
- Halogenated organics

- Copy of Decommissioning Checklist
- Copy of Decommissioning Report

Please submit the required information within two weeks of receipt of this letter. This information will help us to complete our review of the your cleanup activities. However, you should be aware that more specific information may be requested at a later date, if further review reveals that it is required.

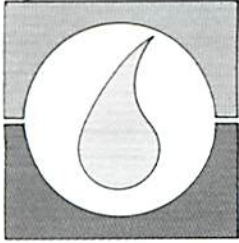
The Department appreciates your cooperation in complying with the underground storage tank regulations. If you have any questions regarding this matter, please contact the Northwest Region at (503) 229-5263.

cc: UST Cleanup Section, ECD (if cleanup related)  
UST Compliance Section, HSW (if UST related)  
NWR file  
Service Provider: PEMCO

431 N COLUMBIA BLVD  
PO BOX 1569  
PORTLAND OR 97211



811 SW Sixth Avenue  
Portland, OR 97204-1390  
(503) 229-5696



**PEMCO**

26-92-001

437 N. Columbia Blvd.  
P.O. Box 11569  
Portland, Oregon 97211  
Office (503) 283-2151  
FAX (503) 283-6388

January 24, 1992

DEQ  
811 SW 6th Ave.  
Portland, OR 97204-1390

Attn: Mr. Loren Garner

Re: Louis Dreyfus  
Ft. of N. Holladay  
Portland, OR 97227  
Facility ID #6714

Dept. of Environmental Quality  
**RECEIVED**  
JAN 28 1992

NORTHWEST REGION


Dear: Mr. Garner:

Enclosed is the environmental report dated January 24, 1992 for the above referenced location.

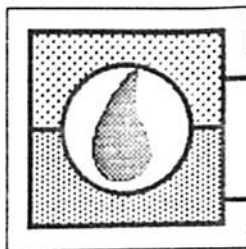
If you have any further questions, please do not hesitate to give me a call.

Sincerely,

PEMCO

  
Brad J. Harris  
Staff Geologist

Enclosure



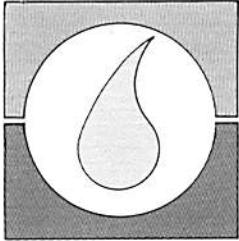
**PEMCO**

437 N. Columbia Blvd. Portland, Oregon  
(503) 283-2151

**ENVIRONMENTAL SITE ASSESSMENT**

For the property located at  
Ft. of N. Holladay  
Portland, OR

Prepared for:  
Louis Dreyfus Corp.



# PEMCO

437 N. Columbia Blvd.  
P.O. Box 11569  
Portland, Oregon 97211  
Office (503) 283-2151  
FAX (503) 283-6388

January 24, 1992

DEQ  
811 SW 6th Ave.  
Portland, OR 97204-1390

Attn: Loren Garner

Re: Louis Dreyfus at the foot of N. Holladay in Portland, OR 97227  
Facility ID # 6714

Dear Mr. Garner:

This letter presents the procedures and results of soil sampling done in conjunction with the decommissioning of (1) 1000 gallon gasoline, (1) 6000 gallon gasoline and (1) 6000 gallon diesel at the above referenced site.

### **Procedures**

On 12/31/91, PEMCO removed three UST's (listed above) at the above referenced site. During the process, slight petroleum odors were detected in the backfill of the UST's, but no observable contamination was noted. The tanks were in good condition with no noticeable holes or significant corrosion. Due to the slight petroleum odors, the DEQ was notified on 1/2/92.

Two soil samples were collected from beneath each UST and analyzed for TPH-HCID. No odors were detected in any of the bottom samples and there were no visual signs of contamination. These field observations were supported by laboratory results which showed the samples to be all non-detected for TPH-HCID. Because slight odors had been detected in the backfill material, soil samples were collected from each of the excavation stockpiles and analyzed for TPH-HCID. These results were also non-detected for petroleum hydrocarbons.

Stockpile samples were collected by digging down two to three feet into the stockpile. Soil samples were obtained from the excavation using a backhoe bucket. The soil was then collected off the bucket's leading edge using

disposable vinyl gloves. All samples were placed in clean, EPA-approved glass containers, packed for minimal headspace and placed on ice for transport to the lab, accompanied by chain of custody documentation.

Complete analytical results and chain of custody documentation can be found in Appendix A.

### **Subsurface Conditions**

Soils encountered at the site consisted of sand and cobbles with minor silt. Since this site is adjacent to the Willamette River, it is more than likely that the material is not native and had to have been either imported or dredged up to be used as fill prior to building the elevator facility and dock. Even though the river is approximately 100 feet away, no water was encountered during the tank removal.

### **Conclusions**

It is PEMCO's belief that this site does not constitute an environmental threat and that no further work should be required. Since no detectable levels of contamination were found in any of the soil samples, the excavation was backfilled with the original backfill material and clean import to grade. If the Department concurs with this conclusion, a letter to that effect would be greatly appreciated.

If you have any questions or comments, please feel free to call.

Sincerely,

PEMCO



Brad J. Harris  
Staff Geologist

cc: Dan Stutz  
Louis Dryfus

disposable vinyl gloves. All samples were placed in clean EPA-approved glass containers packed for minimal headspace and placed on ice for transport to the lab, accompanied by chain of custody documentation.

Complete analytical results and chain of custody documentation can be found in Appendix A.

### Substrate Conditions

Soils encountered at the site consisted of sand and cobbles with minor silt. Since this site is adjacent to the Willamette River, it is more than likely that the material is not native and had to have been either imported or dredged up to be used as fill prior to building the elevator facility and dock. Even though the river is approximately 100 feet away, no water was encountered during the tank removal.

### Conclusions

It is PEMCO's belief that this site does not constitute an environmental threat and that no further work should be required. Since no detectable levels of contamination were found in any of the soil samples, the excavation was backfilled with the original backfill material and clean import to grade. If the Department concurs with this conclusion a letter to that effect would be greatly appreciated.

If you have any questions or comments, please feel free to call.

Sincerely,

PEMCO

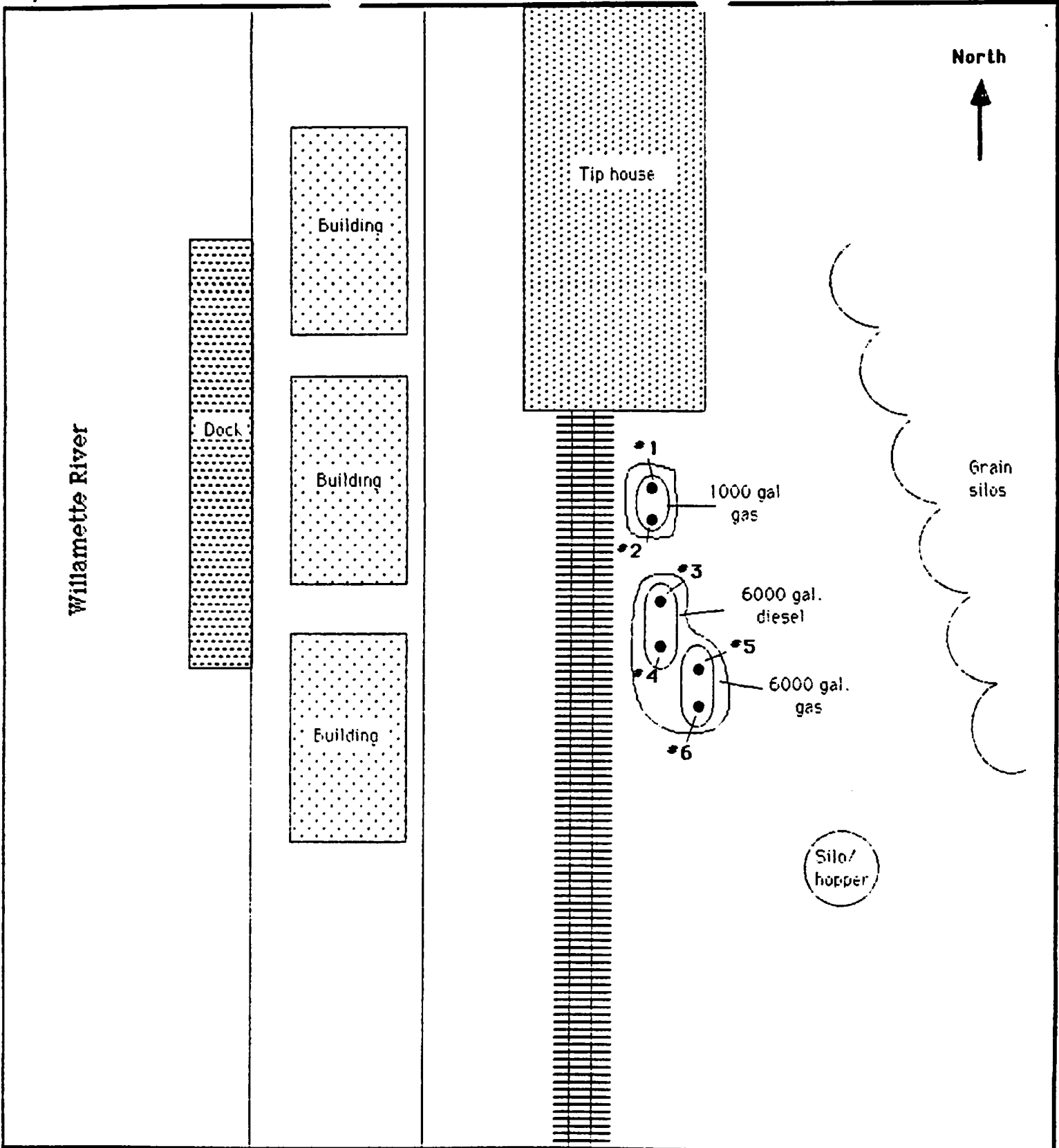
Brad J. Harris  
Staff Geologist

cc: Jan Smith  
Louis Taylor

APPENDIX A



Location Map



Louis Dryfus  
 Ft. of N. Holladay  
 Portland, OR  
 Site Map 1

● Samples collected 12/31/91

**PEMCO**  
 Job #3177  
 Date: 1/6/92  
 Gail K. Wayper



# PEMCO

437 N. COLUMBIA BLVD.  
 P.O. BOX 11569  
 PORTLAND, OR 97217  
 (503) 283-2151

## CHAIN OF CUSTODY

**PROJ. NO.**

3177

**PROJECT NAME:**

LOUIS DRBYEUS

**ADDRESS:**

FOOT OF N HOLLADAY

**SAMPLER**

GREG

MORLEY

**ANALYSIS TYPE REQUESTED:**

SAMPLE NUMBER	DATE	TIME	WATER	SOIL	ICED	SAMPLE LOCATION TANK SIZE TANK PRODUCT	DEPTH	TPH-HCD	TPH-G	TPH-D	TPH(418.1M)	EPA 418.1	BTEX	602/8020	PAH (8310)	Total Pb (7421)	ED8 & EDC (8010)	TCLP(8 meU)	TCLP(3 meU)	PCB's 608/8080	Chlor. Solv. 601/8010	VOC's 8240	BTEX, VPH 3810 Modified	Flashpt (1010)	TOX	
																										1
2	12/31/91	1050		X	X	TANK #1 1,000 GAS SOUTH FLOOR	9'	X																		
3	12/31/91	1230		X	X	TANK # 2 6,000 DIESEL NORTH FLOOR	11	X																		
4	12/31/91	1235		X	X	TANK #2 SOUTH FLOOR	11	X																		
5	12/31/91	2:10		X	X	TANK #3 6,000 GAS NORTH FLOOR	12	X																		
6	12/31/91	2:15		X	X	TANK #3 SOUTH FLOOR	12	X																		

Relinquished by:

Date

Time

Received by:

Relinquished by:

12/31/91

5:00

Relinquished by:

1/2/92

1615

RUSH: YES  NO

LAB #

92-0005



PACIFIC  
ENVIRONMENTAL  
LABORATORY INC.

9405 S.W. Nimbus Ave. Beaverton, OR 97005 (503) 644-0660  
FAX # (503) 644-2202

RECEIVED  
JAN 09 1992  
Ass'd.....

January 7, 1992

PEMCO  
P.O. Box 11569  
Portland, OR 97211

Attn: Bill Knutson

Re: JOB #3177  
PROJECT - LOUIS DREYFUS  
PEL #92-0005

Enclosed is the lab report for your samples which were received on January 2, 1992.

#### I. Sample Description

Six Soil Samples

The samples were received under a chain of custody.

The samples were received in containers consistent with EPA protocol.

#### II. Quality Control

No project specific QC was requested. In-house QC data is available upon request.

#### III. Analytical Results

Test methods may include minor modifications of published methods such as detection limits or parameter lists. Solid and waste samples are reported on an "as received" basis unless otherwise noted.

Compounds not detected are listed under results as ND.

Sincerely,

Howard Holmes  
Lab Manager

Howard Boorse  
QA/QC Manager



PEL REPORT NUMBER: 92-0005  
 CLIENT: PEMCO  
 JOB REFERENCE: 3177  
 PROJECT: LOUIS DREYFUS  
 DATE: January 7, 1992  
 ITEMS: Six Soil Samples

**METHOD:** TPH-HCID per Oregon DEQ  
 Detection limits in mg/kg (ppm)

<u>Sample I.D.</u>	<u>Gasoline</u>	<u>Diesel</u>	<u>Bunker/ Related</u>
TANK #1 NORTH FLOOR	ND	ND	ND
TANK #1 SOUTH FLOOR	ND	ND	ND
TANK #2 NORTH FLOOR	ND	ND	ND
TANK #2 SOUTH FLOOR	ND	ND	ND
TANK #3 NORTH FLOOR	ND	ND	ND
TANK #3 SOUTH FLOOR	ND	ND	ND
Lab Blank	ND	ND	ND
Detection Limit	20	50	--

TPH-HCID Surrogate Recoveries (%)

<u>Sample I.D.</u>	<u>1-chlorooctadecane (50-150%)</u>
TANK #1 NORTH FLOOR	95
TANK #1 SOUTH FLOOR	96
TANK #2 NORTH FLOOR	97
TANK #2 SOUTH FLOOR	96
TANK #3 NORTH FLOOR	98
TANK #3 SOUTH FLOOR	97
Lab Blank	99



PEMCO

437 N. COLUMBIA BLVD.  
P.O. BOX 11569  
PORTLAND, OR 97217  
(503) 283-2151

CHAIN OF CUSTODY

PROJ. NO.  
3177

PROJECT NAME:  
*Louis Dreyfus Corp*  
ADDRESS:  
*East of N Holladay PHD. OR*

SAMPLER  
*BEAD*  
*HARRIS*

ANALYSIS TYPE REQUESTED:

SAMPLE NUMBER	DATE	TIME	WATER	SOIL	ICED	SAMPLE LOCATION TANK SIZE TANK PRODUCT	DEPTH	TPH-HCD	TPH-G	TPH-D	TPH(418.1M)	EPA 418.1	BTEX 602/6020	PAH (6310) Total Pb (7421)	EDB & EDC (8010)	TCLP(8 mt)	TCLP(3 mt)	PCB's 608/6080	Chlor. Solv. 601/6010	VOC's 6240	BTEX, VPH 2910 Modified	Flashpt (1010)	TOX	
																								1
2	1/2/92	4:10		X	X	Stockpile Tank #2	N/A	X																
3	1/2/92	4:15		X	X	Stockpile Tank #3	N/A	X																

Relinquished by: <i>[Signature]</i>	Date: 1/6/92	Time: 1340	Received by: <i>[Signature]</i>
Relinquished by:			
Relinquished by:			

RUSH: YES  NO

LAB #  
92-0029



PACIFIC  
ENVIRONMENTAL  
LABORATORY INC

January 13, 1992

PEMCO  
P.O. Box 11569  
Portland, OR 97211

Attn: Bill Knutson

Re: JOB #3177  
PROJECT - Louis Dreyfus Corp.  
PEL #92-0029

RECEIVED  
JAN 15 1992  
1:54.....

Enclosed is the lab report for your samples which were received on January 6, 1992.

### I. Sample Description

#### Three Soil Samples

The samples were received under a chain of custody.

The samples were received in containers consistent with EPA protocol.

### II. Quality Control

No project specific QC was requested. In-house QC data is available upon request.

### III. Analytical Results

Test methods may include minor modifications of published methods such as detection limits or parameter lists. Solid and waste samples are reported on an "as received" basis unless otherwise noted.

Compounds not detected are listed under results as ND.

Sincerely,

Howard Holmes  
Project Manager

Rob May  
Project Manager



METHOD: TPH-HCID per Oregon DEQ  
Detection limits in mg/kg (ppm)

<u>Sample I.D.</u>	<u>Gasoline</u>	<u>Diesel</u>	<u>Bunker/ Related</u>
1	ND	ND	ND
2	ND	ND	ND
3	ND	ND	ND
Lab Blank	ND	ND	ND
Detection Limit	20	50	--

TPH-HCID Surrogate Recoveries (%)

<u>Sample I.D.</u>	<u>1-chlorooctadecane (50-150%)</u>
1	84
2	88
3	87
Lab Blank	86

January 8, 1992

DAN STUTZ  
LOUIS DREYFUS ELEVATORS  
1800 SW FIRST  
PORTLAND OREGON 97201

RE: UST - Multnomah County  
Louis Dreyfus Elevators  
File No. 26-92-001

Dear Mr. Stutz:

As required by Oregon Administrative Rules (OAR), on January 2, 1992, a release was reported from an underground storage tank (UST) system at your facility located at the foot of North Holiday in Portland, Oregon. As the owner of the facility, you are required to clean up the release according to OAR 340-122-201 through 340-122-360, "Cleanup Rules for Leaking Petroleum UST Systems and Numeric Soil Cleanup Levels for Motor Fuel and Heating Oil". A copy of these rules is enclosed.

The following is an outline of the reporting process required by the Northwest Region, Department of Environmental Quality:

1. If the cleanup is to be completed within 45 days of identifying the release, a single, final report can be submitted within 30 days of cleanup completion. This will satisfy the documentation requirements, provided you meet the provisions of OAR 340-122-360.
2. If cleanup cannot be completed within 45 days, submittal of an initial status report is required within 45 days of reporting the release. The report must summarize the findings to-date, outline your planned actions, and include anticipated dates of completion for each action. Additional interim reports may also be required depending on individual circumstances. A final report will be required within 30 days of completion of the project.

Please read the enclosed rules carefully. Note that one of the first things you must do is determine the scope of the problem in order to select the best method of remediation. The enclosed information will give you the guidance necessary to meet the specific documentation requirements for your site. As the owner, you should be aware of the regulations, even if you have hired a qualified consultant to do the actual work.



811 SW Sixth Avenue  
Portland, OR 97204-1390  
(503) 229-5696

Page 2

Please keep the Department up-to-date on activities at the site. This will help to expedite cleanup and closure of the site. **File No. 26-92-001** has been assigned to this project. Please reference this number in all future correspondence.

Removing contaminated soils to the matrix cleanup levels is only one of many options that you may wish to consider for your site. You may find the services of a qualified consultant helpful in evaluating different cleanup options. Cleanup options other than removal to matrix standards require that a Corrective Action Plan (CAP) be submitted to the Department for approval. If a CAP is appropriate for your site, additional information about this process may be obtained from the region.

The Department is required to recover costs from the responsible party for oversight of CAP cleanups. You will be notified if the Department determines that cost recovery will be implemented for your site. For general information about the cost recovery process, please contact Mr. Rick Silverman at (503) 229-6384.

Thank you for your cooperation and continued efforts to comply with the regulations. If you have any questions, please contact the Northwest Region at (503) 229-6385.

Sincerely,

UST CLEANUP SECTION  
Northwest Region

enclosure

cc: UST Cleanup Section, ECD

PETROLEUM RELEASE FORM  
Please Check All That Apply

2-7-97

INCIDENT INFORMATION

LOG NBR: 26-92-0001  
UST FAC NBR: 6714  
SITE NAME: Louis Dreyfus Elevators (grain)  
SITE ADDRESS: foot of N. Holladay  
SITE CITY: Portland ZIP: 97227  
SITE COUNTY: Multnomah PHONE: 232-0127

RECEIVED BY: LGG  
DATE REPORTED: 1, 2, 92  
 REGULATED UST  
 NON-REGULATED UST  
 HEATING OIL TANK

PROJECT MANAGER: Andree Pollock

FUNDING  
 LUST  
 OHC  
 INVOICE START  
 HSRAF  
 FINANCIAL ASST  
 INVOICE STOP  
 NFA SENT

MAIL CONTACTS

REPORTED BY

NAME: Brad Harris  
COMPANY: Pemeo  
ADDRESS:  
CITY: ZIP:  
STATE: PHONE: 283-2151

RESPONSIBLE PARTY

NAME: Dan Stutz  
COMPANY: Louis Dreyfus Elevators  
ADDRESS: Foot of N. Holladay  
CITY: Portland ZIP: 97227  
STATE: OR PHONE: 232-0127  
1800 SW First Ave  
Portland OR 97201

RP →

INVOICE CONTACT

NAME:  
COMPANY:  
ADDRESS:  
CITY: ZIP:  
STATE: PHONE:

NAME:  
COMPANY:  
ADDRESS:  
CITY: ZIP:  
STATE: PHONE:

SITE ASSESSMENT

DATE DISCOVERED: 12, 31, 91  
 EMERGENCY RESP.  
 ENFORCEMENT

FUTHER CLEANUP REQ.  
 NO FURTHER CLEANUP REQ.  
 OFFSITE MIGRATION

\* 2-7-97 \*

L.I.P.S. SCORE (Region)

CONFIRMATION:

- SI) STAFF
- LD) LAB: DEQ
- LR) LAB: RP
- LO) LAB: OTHER
- RR) RP REPORT
- CN) CONTRACTOR
- OT) OTHER

DISCOVERY:

- RM) ROUTINE MONITORING
- DC) DECOMMISSIONING
- CP) COMPLAINT
- IC) INVENTORY CONTROL
- SA) SITE ASSESSMENT
- TT) TANK TEST
- OT) OTHER

CAUSE:

- TL) TANK LEAK
- PL) PIPE LEAK
- OF) OVERFILL
- SS) SURFACE SPILL
- PV) PUMP/VALVE LEAK
- OT) OTHER
- UN) UNKNOWN

This Space Provided For Regional Use

NOTES/COMMENTS:

FINAL DISPOSITION OF SOIL:

- TREATED
- ONSITE
- LANDFILL

- UNTREATED
- ROAD BASE
- OTHER

AMOUNT OF SOIL (yds 3) DISPOSED OF:

AMOUNT OF SOIL (yds 3) TREATED OFF SITE:

AMOUNT OF SOIL (yds 3) TREATED ON SITE:

TREATMENT METHOD:

- AREATION
- THERMAL
- BIOLOGICAL
- OTHER

SWLA PERMIT NUMBER:

DATE ISSUED:

CLEANUP STARTED:

NO FURTHER ACTION:

RELEASE STOPPED:

REMEDIATION COMPLETED:

12, 31, 91  
12, 31, 91  
11, 25, 96  
2, 7, 97UG

SITE - SOIL MANAGEMENT

- UNLEADED GASOLINE
- LEADED GASOLINE
- MISC. GASOLINE
- DIESEL
- FUEL OIL
- WASTE OIL
- LUBRICANT

CONTAMINANTS:

- SOLVENT
- BUNKER FUEL
- OTHER PET. DIST.
- CHEMICAL
- HEATING OIL
- UNKNOWN
- OTHER

- SOIL
- GROUNDWATER
- SURFACE WATER
- DRINKING WATER
- VAPOR
- FACILITY (FREE PROD.)

MEDIA/IMPACT:

CONTAMINANTS - IMPACTS

Site Management Comments:

Estimations: Cost of Cleanup: \_\_\_\_\_ Staff Time On Project: \_\_\_\_\_

Source of Cost Recovery: Pct. R.P.: \_\_\_\_\_ Pct. SLW/TF: \_\_\_\_\_ Pct. SLW/OTF: \_\_\_\_\_

Free Product Disposal: \_\_\_\_\_ Est. Gallons: \_\_\_\_\_

Cleanup Guideline: Matrix C.A.P. \_\_\_\_\_

End Date: \_\_\_\_\_ Contractor Name: PERCO

Under Control Date: 12/31/91

Cleanup Activity: Start Date: 12/31/91 Date Released Stopped: 12/31/91

LUST Incident Nbr: (XXXXXXXXXXXX)

- SITE MANAGEMENT -

Site Assessment Comments: Over in backfill - stop for 10 days at present.

Impacts:	Soil	Y	N	%	?
	Groundwater	Y	N	%	?
	Surface Water	Y	N	%	?
	Drinking Water	Y	N	%	?
	Facility (Vapor)	Y	N	%	?
	Facility (Free Product)	Y	N	%	?

Source of Release: A) Tank Leak B) Pipe Leak C) Overfill D) Surface Spill E) Pump/Valve Leak F) Other G) Unknown

Material Released: A) Unleaded Gasoline B) Leaded Gasoline C) Misc. Gasoline D) Diesel E) Fuel Oil F) Waste Oil G) Lubricant H) Solvent I) Bunker Fuel J) Other Pet. Dist. K) Chemical L) Unknown

How Discovered: A) Routine Monitoring B) Inventory Control C) Decommissioning D) Site Assessment

Discovery Date: 12/31/91

Off-Site Migration: Y  N  ?

Cleanup Necessary: Y  N  ?

Release Exists: Y  N  ?

Investigated By: by odor

Investigation Method: A) Staff B) Lab: DEQ C) Lab: RP D) Lab: Other E) RP F) Other

Exposure Assessment: Y  N

Priority: \_\_\_\_\_

- SITE ASSESSMENT -

LUST Incident Nbr: (XXXXXXXXXXXX)

Reported By: Brad Harris

Company: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_

State: \_\_\_\_\_

Phone: 283-2151

Zip: \_\_\_\_\_

LUST Contact: \_\_\_\_\_

Responsible Party: Don Stutz

Company: Louis Dreyfus Elevators

Street: Foot of N. Holladay

City: Portland

State: OR

Phone: 238-0127

Zip: 97227

Address: 1800 SW First Ave. Portland, OR 97201

- CONTACT & MAIL TYPES -

Incident Comments: \_\_\_\_\_

County: Mult

City: Portland

Street: Foot of N. Holladay

Zip: 97227

Phone: \_\_\_\_\_

Received By: LGS

LUST Log Nbr: 26-92-001

Date Received: 1/2/92

File Name: Louis Dreyfus Elevators (Lamm)

Emergency Resp Taken: Y  N

USt Facility ID: 6714

- INCIDENT INFORMATION -

