



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region
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September 14, 2017

via electronic delivery

Mr. Dana Zanone
IMACC Corporation
4225 Solano Avenue, #746
Napa, CA 94558

Re: DEQ Conditional Approval of IMACC Drum Pipeline Replacement Work Plan
Container Management Services Site
ECSI #4784

Dear Mr. Zanone,

This letter provides Oregon Department of Environmental Quality's (DEQ's) conditional approval of the September 2017 *Drum Pipeline Replacement Work Plan*. DEQ provides approval to replace the drum pipeline consistent with the referenced work plan upon acceptance of DEQ's below modifications and also any City of Portland requirements.

DEQ work plan modifications are as follows:

- Please notify DEQ 48-hours prior to start of work. DEQ may choose to observe some or all of the work.
- Characterize the material for disposal through collection and analysis of excavated material for site chemicals of interest (metals, polychlorinated biphenyls, chlorinated pesticides, total petroleum hydrocarbons, semi-volatile organic compounds, and volatile organic compounds) rather than rely on previous nearby sample results as stated in the work plan. Include the results in the report

In addition, consider characterizing the soil in the excavated area, particularly if you anticipate pursuing a No Further Action determination. Recommended soil characterization is as follows:

- Screen soil at the bottom of the excavation at 20-foot intervals visually and using a photoionization detector. Log observations.
- Collect three discrete soil samples from the bottom of the excavation. Prioritize sample collection at locations where there is screening-level indication of contamination. If no indications of contamination are apparent, collect samples at evenly spaced intervals along the length of the drum pipeline excavation. Analyze samples for site chemicals of interest.

Please contact me at 503-229-6932 if you have questions.

Regards,



Madi Novak
Project Manager
Northwest Region Cleanup Section

Electronic copies to:

Paul Seidel, DEQ
Matt McClincy, DEQ
Alex Liverman, DEQ
Jim Orr, DEQ
Gary Vrooman, DOJ
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Paper copy to:

DEQ NWR files ECSI # 4784