

State of Oregon

Department of Environmental Quality Memorandum

December 27, 2018

To: File. East Multnomah County Troutdale Sandstone Aquifer Remedy Decommissioned Well BOP-70(ds) Investigation-Derived Waste. ECSI #1479

From: Kenneth Thiessen, NWR Cleanup Project Manager

Through: Jay Collins, NWR Hazardous Waste Inspector

Approved: Audrey O'Brien, NWR Hazardous Waste Program Manager

Approved: Paul Seidel, NWR Cleanup Manager

Subject: No Longer Contained-In Determination for Investigation Derived Waste. East Multnomah County Troutdale Sandstone Aquifer Remedy 2201 NE 201st Ave. Fairview, Oregon. (ECSI #1479)

The DEQ Northwest Region Environmental Cleanup and Hazardous Waste Programs have prepared this No Longer Contained-In Determination for investigation derived waste (IDW) produced during decommissioning of monitoring well BOP-70 generating waste filter pack sand, drilling mud, and soil as drill cuttings. The decommissioned BOP-70(ds) nested well had three screened intervals at 215, 245, and 275 feet below ground surface. Monitoring well BOP-70(ds) was installed in about 1990 to evaluate the northwestern extent of a VOC plume attributed to Cascade Corporation. Monitoring well BOP-70(ds) was located in NE 185th Avenue north of NW Sandy Blvd. in Gresham, Oregon. Through on-going remediation, the contaminant plume has contracted from this area and this monitoring well is no longer required.

Potentially applicable waste codes that could apply to this material are F001 or F002, for waste related to the VOCs trichloroethylene (TCE), tetrachloroethene (PCE), and cis-1,2 dichloroethene (cis-1,2 DCE). Analytical results from six IDW samples, using EPA Method 8260B, indicated that no volatile organic compounds (VOCs) were detected in any of the samples.

The IDW filter pack sand, drilling mud and drill cuttings is currently stored two lined, 10 cubic yard soil bins. A third 10 cubic yard soil bin contains the removed well monument, well sealing concrete material, and well casing remnants and is not considered in this No Longer Contained-In Determination. The three bins are currently located at the Cascade remediation property located at 2525 NE 201st Ave., Gresham, Oregon.


Soil analyses were conducted as totals, not TCLP. The results of the VOC chemical analysis are tabulated using TCE, PCE and cis-1,2 DCE as the contaminants of interest for the site.


Oregon DEQ Contained-In Determination Approval Signoff Sheet

Site Name: East Multnomah County Troutdale Sandstone Aquifer Remedy (ECSI #1479)
Location: 2201 NE 201st Ave. Fairview, Oregon
Media: Soil with Well Monument and Well-packing Material
Approved Disposal: Hillsboro Landfill, Hillsboro, Oregon

DEQ Project Manager:  Date: 12/27/2018
Kenneth Thiessen

DEQ HW Staff:  Date: 12/27/18
Jay Collins

DEQ HSW Program Manager:  Date: 12/27/18
Audrey O'Brien

DEQ Cleanup Program Manager:  Date: 12/27/18
Paul Seidel

Media	Max. TCE Concentration	TCE RBC Soil Direct Contact (mg/Kg)	TCE RBC Soil Leaching to Groundwater (mg/Kg)	TCE RBC Water ingestion (mg/Kg)	20xTCLP Limit TCE for Soil (ppm)
IDW Soil, mud, sand	ND<0.00117 (RDL) mg/Kg	Occupational 51	Occupational: 0.087	Occupational: 3.3	Not applicable

Media	Max. PCE Concentration	PCE RBC Soil Direct Contact (mg/Kg)	PCE RBC Soil Leaching to Groundwater (mg/Kg)	PCE RBC Water ingestion (mg/Kg)	20xTCLP Limit PCE for Soil (ppm)
IDW Soil, mud, sand	ND <0.00117 mg/Kg	Occupational: 1000	Occupational: 1.9	Occupational: 48	Not applicable

Media	Max. cis-1,2 DCE Concentration	cis-1,2 DCE RBC Soil Direct Contact (mg/Kg)	cis-1,2 DCE RBC Leaching to Groundwater (mg/Kg)	cis-1,2 DCE RBC Water ingestion (mg/Kg)	20xTCLP Limit cis-1,2 DCE for Soil (ppm)
IDW Soil, mud, sand	ND <0.00467 mg/Kg	Occupational 2300	Occupational: 4.5	Occupational: 260	Not applicable

- ND indicates that concentration is less than indicated Reported Detection Limit (RDL).
- RDL value used is average of analyte RDLs for six samples.
- RBC = DEQ Risk-Based Concentrations for Individual Chemicals, May 2018 revision.

This No Longer Contained-In Determination documents that the IDW (as filter pack sand, drilling mud and some soil cuttings) is not a characteristic hazardous waste. This waste is not listed hazardous waste. Therefore, Land Disposal Requirements do not apply to this IDW material.

Based on the uniform non-detected results for VOC analytical results by EPA Method 8260B, DEQ approves a No-longer Contain-In Determination for this well decommissioning IDW as this material does not contain hazardous waste and does not exhibit hazardous waste characteristics. DEQ approves the IDW soil for disposal at the Waste Management Hillsboro Landfill, a DEQ-permitted, Subtitle D-equivalent facility.

Reference: December 11, 2018. Geosyntec Consultants. BOP70ds Well Decommissioning – No Longer Contains Determination Request. East Multnomah County Troutdale Sandstone Aquifer Remedy (ECSI No. 1479) Fairview, Oregon.