



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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November 10, 2022

Jason Hegdahl
Cascade Corporation
2201 NE 201st Avenue
Fairview, Oregon 97024

Deborah Taege
The Boeing Company
Environment, Health & Safety
Bldg. 10-20, MC 9U4-26, 800 N 6th Street
Renton, WA 98055-1409

**RE: East Multnomah County, Troutdale Sandstone Aquifer (TSA) Remedy
Conditional No Further Action Determination for Zone A of the TSA and a No Further
Action Determination for the Site-Related Sand and Gravel Aquifer (SGA).
ECSI # 1479.**

Dear Ms. Taege and Mr. Hegdahl:

The Oregon Department of Environmental Quality (DEQ) has completed its review of site information and the proposed project closure report entitled: *Partial No Further Action Request, East Multnomah County Troutdale Sandstone Aquifer Remedy, Zone A and SGA, ECSI 1479*, prepared on your behalf by Geosyntec Consultants and Landau Associates, and dated April 23, 2020.

DEQ has determined that remedial action to address trichloroethylene (TCE) contamination in groundwater at the East Multnomah County Troutdale Sandstone Aquifer Remedy (East Multnomah County project) is complete with the following considerations:

- A conditional No Further Action (CNFA) determination is made for Zone A of the TSA. It is conditional as this determination is limited to the portion of the project area known as Zone A. As well, DEQ requires that groundwater sampling and analysis from two Portland Water Bureau monitoring wells will continue for five years to confirm that contaminant concentrations remain below project action levels specified in DEQ's 1996 Record of Decision.
- An unencumbered NFA determination is also made for the deeper SGA for the entirety of the East Multnomah County project site.

These CNFA/NFA determinations are based on the DEQ regulations, site data, and the facts as we understand them including the following:

- The Cascade Corporation (Cascade) facility is located at 2201 NE 201st Ave in Gresham, Oregon, and The Boeing Company (Boeing) facility is located at 19000 NE Sandy Boulevard in Portland, Oregon. Cascade and Boeing are jointly responsible for the East Multnomah County TSA Remedy.
- Past site uses: Residential, agricultural, light industrial, heavy industrial, transportation.
- Four groundwater restoration areas (Zones A, B, C, and D) were identified for operational efficiency. Zone A is located north of Sandy Boulevard, and downgradient of the TCE release area.
- Sources of Contamination Both Boeing and Cascade are industrial manufacturers of machine parts which previously used TCE in vapor degreasers in their manufacturing processes. TCE releases from these vapor degreasers at both facilities caused contamination of aquifers in a combined plume.
- Affected media: Groundwater.

- Remedial actions taken: Installation of monitoring wells, groundwater extraction wells, and other Interim Remedial Action Measures (IRAMs) were completed following discovery of TCE in groundwater. In 1993, groundwater extraction and treatment were initiated to remove TCE and to provide hydraulic control preventing further migration of contamination. Other IRAMs include closure of industrial and private water supply wells.
- Contamination left in place: No known contamination remains in place in the SGA or TSA aquifers in Zone A.
- Groundwater Use: The East Multnomah County Site is located within the Columbia South Shore Wellfield, managed by the Portland Water Bureau. The wellfield is a supplemental supply of drinking water for the Portland region. The Rockwood Public Utility District and the City of Gresham also utilize municipal wells in the area.
- Current land use: light industrial, heavy industrial, transportation, open areas.
- Complete ecological exposure pathways: Results of an ecological risk evaluation found that no indicator species were impacted by site contaminants in the Columbia Slough.
- Complete human exposure pathways: No Zone A TSA or SGA groundwater was found to constitute a complete risk exposure pathway to humans.
- Residual risk: No Zone A TSA or SGA groundwater presents a residual risk exceeding project cleanup levels.
- Public Comment Period: The Staff Memorandum supporting this CNFA/NFA determination was made available for public review and comment during March 2022. Comments were received and have been included in a revised DEQ Staff Memorandum dated October 5, 2022.
- Conditions of the No Further Action Determination: DEQ requires that annual monitoring of PWB-1(lts) and PWB-1(uts) be continued for five years after issuance of this CNFA decision to confirm that contaminant detections remain below project cleanup levels.

Based on the comprehensive site information, conditions at Zone A of the East Multnomah County, Troutdale Sandstone Aquifer (TSA) Remedy are protective of public health and the environment. Zone A requires no further remedial action under the Oregon Environmental Cleanup Law, ORS 465.200 et seq., unless new or previously undisclosed information becomes available, or there are changes in Site development or land and water uses, or more contamination is discovered. DEQ will update the Environmental Cleanup Site Information System (ECSI #1479) database to reflect this decision. The Institutional Controls, specified in the ROD, including groundwater use restrictions related to the Zone A TSA and the SGA for the whole East Multnomah County Site, will be lifted with this CNFA/NFA determination.

This letter only applies to the TCE releases and breakdown products. If any other contaminated soil or groundwater is encountered in the future, it must be handled and disposed of in accordance with local, state and federal regulations. Monitoring wells must be installed, maintained, and abandoned in accordance with Oregon Water Resources Department regulations.

A copy of the Staff Memorandum supporting this Conditional No Further Action decision for Zone A of the TSA and a No Further Action Determination for the Site (SGA), can be viewed at:
<https://www.deq.state.or.us/Webdocs/Forms/Output/FPController.ashx?SourceIdType=11&SourceId=1479&Screen=Load>

DEQ recommends keeping a copy of all the documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Kenneth Thiessen at (503) 887-7636, or via email at Thiessen.Kenneth@deq.oregon.gov

Sincerely,



Paul Seidel, Manager
Northwest Region Cleanup Section

cc: Dan Hafley, RG, Northwest Region Cleanup Section
Kenneth Thiessen, CEG, Northwest Region Cleanup Section
Doug Wise, Portland Water Bureau
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Cindy Bartlett, RG, Geosyntec Consultants
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ECSI # 1479