



Oregon

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March 7, 2024

via electronic mail

Rob Hackleman
CPIF PDX LLC
1910 Fairview Avenue
Suite 200
Seattle, WA 98102

Re: Coast Mirror
1732 NE 2nd Avenue
Portland, OR 97212
ECSI File No. 6216

Dear Mr. Hackleman:

The Department of Environmental Quality (DEQ) has reviewed an updated work plan entitled *UIC Registration, Decommissioning, and Regulatory Closure* (updated work plan), prepared for the above-referenced site (Site) by Creekside Environmental Consulting, dated November 3, 2023. The updated work plan supersedes a prior version dated September 20, 2017, and was updated because plans for contaminated soil management and confirmation sampling have changed since 2017.

General and specific comments of the work plan are provided below. It should be noted that DEQ met (video call) with Mr. Lynn Green of EVREN Northwest, Inc, on February 21, 2024, to discuss the Incremental Sampling Method (ISM) approach described in the updated work plan. This meeting is referenced below where the comment incorporates outcomes of this meeting.

General Comments

- 1) The title and content of the updated work plan are misleading because it is focused on the registration, decommissioning, and regulatory closure of two underground injection control (UIC) features to ensure compliance with UIC regulations (OAR 340-044). DEQ notes, however, that focused soil removal or remedial action would be needed even in the absence of the UICs because there are other areas of contamination that are well away from the UICs. The proposed work is therefore also considered to be a remedial action pursuant to OAR 340-122-0040. DEQ recommends a title change that better reflects the dual purpose of the proposed work.
- 2) The UICs should be described consistently throughout the updated work plan. Currently, they are described as, including but not limited to, floor drains/earthen sumps, unlined sumps/floor drains, sump features, UIC features, manmade sumps, and former sumps. Please revise the work plan to provide greater consistency in terminology for these features.
- 3) While the updated work plan is not intended to address demolition of the existing buildings, it should be noted, given the age of the buildings, that a pre-demolition survey should be performed to evaluate the presence of regulated building materials such as asbestos containing materials and lead-based paint. Abatement of such materials, if needed, should be performed in accordance with applicable rules and regulations.

Specific Comments

- 4) **Section 3.2, Sumps/Floor drains (UIC Devices)**: Figure 2 is cited in this section as showing the locations of the two UICs (DWFD01 and DWFD02); however, the Figure 2 legend identifies these features only as “catch basins”. This figure should be modified to identify DWFD01 and DWFD02 as UICs, or whatever terminology is selected as requested in General Comment No. 2.
- 5) **Sections 3.4.1, DWFD01, and 3.4.2, DWFD02**: Discussion of historical analytical data for the Site is limited to contaminants found below or adjacent to the UICs. As noted in General Comment No. 1, the proposed work is not limited to contamination associated with the UICs, but also addresses impacts to soil from other source areas at the Site. As such, information should also be provided summarizing the results from investigations in 2011 and 2015 to support the basis for focused soil removal and the delineation of decision units (DUs). Please revise accordingly.

Figure 3 includes soil analytical data for many of the former borings advanced at the Site, but data are not shown for key borings located within excavation areas EX01 (e.g., B1, B4, B30, B31, B32, and B34), EX02 (B5 and B10), and EX03 (e.g., B19 and B21). Data from these borings should be included in Figure 3 for context to support delineation of the excavation areas.

- 6) **Section 3.8, Rule-Authorized Injection of Storm Water**: The Site is reportedly authorized by rule (“rule authorized”) to construct two new UIC dry wells after mass excavation is completed. Figure 3 should be modified to clearly indicate that the two dry wells shown are planned features (the figure legend suggests they are existing features).
- 7) **Section 4.0, UPDATED WORKPLAN**: As discussed during the February 21, 2024, meeting, this section should describe what actions will be taken if ISM confirmation soil sample data demonstrate relevant soil screening levels are not achieved after focused soil removals.
- 8) **Section 4.3.1, Incremental Sampling Method**:
 - a) As discussed during the February 21, 2024, meeting, this section should describe the collection of discrete confirmation soil samples from DU01 and DU02 for laboratory analyses only if ISM sample data demonstrate relevant soil screening levels are not achieved. The methodology for discrete confirmation soil sampling should be described (e.g., a discrete sample per specified square area, or other proposed method).
 - b) As discussed during the February 21, 2024, meeting, there was confusion about what the DU03 ISM sample represents. It should be clearly stated that the DU03 ISM sample will be collected after mass excavation across the Site to approximately 15 feet below ground surface (bgs) is completed.
 - c) Figure 3 should be modified to reference the DUs. Also, the thin, light blue line that delineates the DUs does not show well in electronic or printed format; it is recommended that a different border line be used.
 - d) DEQ recommends collecting increments in a systematic random sampling scheme (instead of grid-center sampling as proposed) per DEQ’s Decision Unit Characterization guidance dated September 14, 2020.
 - e) Describe how increment samples will be located to ensure fixed spacing between samples is achieved (e.g., use of GPS and/or other method, particularly on the sidewalls of DU01 and DU02 where GPS can’t be used).

- 9) **Section 4.3.4, Field Sampling Equipment:** DEQ's Decision Unit Characterization guidance (September 14, 2020) states that the use of a square tool or cylindrical core ensures no bias toward any of the particles present, while rounded or flat scoops introduce a bias in the particle sizes collected. A sampling shovel should therefore not be used, but a stainless-steel push probe is acceptable.
- 10) **Section 4.3.5, General Sampling Procedures, Table 4-1:** As discussed during the February 21, 2024, meeting, it was brought to DEQ's attention that analyses for volatile organic compounds (VOCs) and gasoline-range hydrocarbons will only be performed for the EX02 composite sample, which is not explicit in Table 4-1. Table 4-1 should be modified to indicate which analyses will be performed for each DU and for EX02.

If you have any questions, please call me at (503) 501-0669.

Respectfully,

A handwritten signature in blue ink, appearing to read "David Lamadrid".

David Lamadrid
Project Manager
Northwest Region Cleanup Program

cc: Lynn Green, EVREN Northwest, Inc.
Brent Jorgensen, Creekside Environmental Consulting, LLC
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