Oregon DEQ Contained-In Determination Approval Signoff Sheet

Site Name [include ESCI/LUST/RCRA #]: Shortstack Belmont (Former Washworld)
ECSI #5731

Location: 2785 SE Belmont Street, Portland, Oregon

Media: Soil and Groundwater

Approved Disposal Location: Wasco County Landfill, 2550 Steele Rd, The Dalles, OR 97058 and potentially, Clean Water Act permitted wastewater treatment facility

Signatures:

NW Region Cleanup Section Project Manager:

_____ Date: February 18, 2025
Heidi Nelson

NW Region Hazardous Waste Program staff:

_____ Date: February 19, 2025
Michelle Olson

NW Region Hazardous Waste Program manager:

Audrey O'Brien _____ Date: February 19, 2025
Audrey O'Brien

NW Region Cleanup Section manager:

Amanda Wozab _____ Date: February 19, 2025
Amanda Wozab

State of Oregon
Department of Environmental Quality Memorandum

To: **Shortstack Belmont (Former Washworld)** **Date: 2/18/2025**
ECSI #5731

From: **Heidi Nelson, Project Engineer, NW Region Cleanup Section**

Through: **Michelle Olson, Inspector, NW Region Hazardous Waste Program**

Approved: **Audrey O'Brien, Manager, NW Region Hazardous Waste Program**
and
Amanda Wozab, Manager, NW Region Cleanup Section

Subject: **No Longer Contained-In Determination for**
Shortstack Belmont (Former Washworld), Portland, Oregon

DEQ's Northwest Region Environmental Cleanup Section and Hazardous Waste Program prepared this No Longer Contained-In (NLCI) Determination for soil and water generated during remedial activities at the Shortstack Belmont (Former Washworld) site located at 2785 SE Belmont Street in Portland, Oregon. The site was formerly addressed as 2721 – 2731 SE Belmont Street and 2755 SE Belmont Street. DEQ's NLCI Determination was funded under terms of a Voluntary Cleanup Agreement with the owner.

Background Information
The Subject Property is identified as Shortstack Belmont (Former Washworld) and is addressed 2785 SE Belmont Street, Portland, Oregon (subject property/ site). It was formerly addressed as 2755 and as 2721 – 2731 SE Belmont Street and 2755 SE Belmont Street. It is located on Multnomah County Property ID R175616. The Subject Property is currently vacant. A commercial structure was located onsite and was demolished beginning in November 2023. A Vicinity Map is included as attached Figure 1, a Site Map as Figure 2 and a Sample Location Map as Figure 3.

Prior to the commercial structure, a single-family residential structure was located on the Subject Property. All available documentation indicates that commercial dry-cleaning activities were present at the Subject Property from approximately 1968 - 1999. Dry cleaning activities reportedly occurred in the eastern portion of the structure, with a historic associated address of 2725 SE Belmont Street with the current associated address of 2731 SE Belmont Street. According to various information sources, grocery businesses were present in the western portion of the onsite structure from at least 1970 through the late 1980s.

In 2014, DEQ approved a "Contained-In" Determination for the Remedial Excavation work that was completed by Wohlers Environmental Services to remove impacted soil from the source area at the property, which generated PerChloroEthylene (PCE)-Contaminated Soil & Related Materials.

Currently, Shortstack Belmont is a cleanup site and is under Oregon Department of Environmental Quality (DEQ) oversight in the Voluntary Cleanup Program. The site is now undergoing a proposed redevelopment, which includes three (3) four-story residential buildings. The northern building encompasses approximately 2,955 square feet, and the first level will be occupied apartment units, mechanical rooms, and an open-air bike storage facility. The two southern buildings each encompass approximately 1,390 square feet, and the first levels will be occupied by apartment units and a trash facility. The redevelopment will also include construction of a courtyard, landscaped areas, stormwater management facilities, and utilities.

To facilitate the redevelopment, an additional Phase II Environmental Site Assessment (ESA) Investigation was conducted by Cascade Environmental Solutions in November 2021 to delineation the remaining impacted soil (Cascade Environmental Solutions, Phase II: Soil, Groundwater & Soil Vapor Investigation Shortstack Development [Former Washworld Facility] 2721-2731 SE Belmont Street Portland, Oregon ECSI Site #5731, January 18, 2022). The results of this additional investigation were used to evaluate the current soil conditions at the site.

PCE, or its breakdown products such as trichloroethene (TCE) and vinyl chloride (VC), in environmental media from this site would be considered by DEQ to contain a listed hazardous waste (F002).

As part of the cleanup and the proposed housing development, it is estimated that 2,442 cubic yards (CY) to 2,874 CY of soil will be removed from the site. The soil will be disposed of at a solid waste permitted Subtitle D lined landfill with approval of the landfill operator.

It is not anticipated for groundwater to be encountered during redevelopment of the site; however, groundwater data is available for the Site at the monitoring wells and is also evaluated below.

Laboratory Testing Results

A total of 7 representative soil samples from 6 locations (P-01 through P-06) and two groundwater samples, at sample locations P-04 and P-06, were collected on November 2, 2021, and analyzed for chlorinated volatile organize compounds by EPA Method 8260D. PCE was detected as summarized in the table below. TCE and VC were not detected in any of the samples analyzed.

No Longer Contained-In Determination

A No Longer Contained-In Determination is needed to show that the soil and groundwater is not characteristic hazardous waste, and that concentrations of drycleaning solvent chemicals are below protective levels, and if applicable, Land Disposal Requirements (LDRs).

The tables below show relevant sample results for the highest soil and highest groundwater samples collected in 2021 compared to the applicable DEQ risk-based concentrations (RBCs) and Toxicity Characteristic Leachate Procedure (TCLP) criteria.

Media	Maximum PCE Concentrations (at location P-04)	Assessment of Risk-Based Concentrations		
		PCE: Soil Direct Contact Construction Workers (PPM)	PCE: Water in Excavation (PPB)	20 X TCLP Limit PCE for Soil (PPM)
Soil	6.42 PPM	1,800	N/A	14
Groundwater	623 PPB	N/A	5,600	N/A

To demonstrate that the soil and groundwater no longer "contains" hazardous waste, the following conditions need to be met:

1. The soil (a solid) must not exhibit a characteristic of hazardous waste (must not be reactive or toxic). The potential for soil containing a waste to exhibit the toxicity characteristic is evaluated through comparison of constituent concentrations in leachate, extracted from the waste, using the Toxicity Characteristic Leaching Procedure, also called TCLP, with the limits specified at 40 CFR, Part 261.24. Representative (total) chemical concentrations for the soil are compared to a value of 20 times the TCLP limit (to account for the 20 to 1 dilution inherent in the TCLP analysis method) to determine if the limits could potentially be exceeded. If the 20 times TCLP limit for any chemical is exceeded, then the waste may be a characteristic waste. The 20 times TCLP limit for PCE is 14 parts per million or 14,000 parts per billion. The soil does not fail the toxicity characteristic for PCE. The soil is not a characteristic hazardous waste.
2. The water must not exhibit a characteristic of a hazardous waste (must not be ignitable or corrosive). Results for PCE in the groundwater are below their respective TCLP values. Based on knowledge of process, DEQ has determined that the water is neither ignitable nor corrosive.
3. PCE, TCE or VC contamination in environmental media from this site would be considered by DEQ to contain a listed hazardous waste (F002). Concentrations of hazardous constituents from listed waste must be below health-based levels. For water, DEQ's current policy is that if the water is to be taken to a Clean Water Act (CWA) permitted wastewater treatment facility then concentrations of hazardous constituents

should be below the DEQ's "Groundwater in an Excavation" RBC. The detected concentration of PCE is below its respective RBC.

4. RCRA LDRs do not apply because the waste was not removed from the Area of Contamination prior to this determination.

Underlying constituents of PCE, TCE and VC might be present in the water at concentrations below the minimum reporting levels (MRLs) shown in the laboratory data. Using the MRL concentrations and our knowledge of process, we can assume the following about the water:

- It is not ignitable, corrosive nor reactive;
- Concentrations of underlying constituents would be below Toxicity Characteristic levels; and
- Concentrations of underlying constituents would be below DEQ protective levels (Occupational RBCs).

Based on our review of the data and the above findings, DEQ has determined that the soil and groundwater at the site do not exhibit characteristics of a hazardous waste. PCE, TCE and VC were not detected above their DEQ generic RBCs for soil or groundwater. Neither the soil nor groundwater pose an unacceptable risk under a construction and excavation worker scenario for soil and groundwater and thus meets the criteria for no longer containing listed waste if disposed in compliance with the applicable hazardous waste regulations.

If the soil and/or groundwater are not managed and disposed of following these conditions of approval, this No Longer Contained-In Determination does not apply, the waste remains hazardous waste and must be managed and disposed of in compliance with applicable hazardous waste laws.

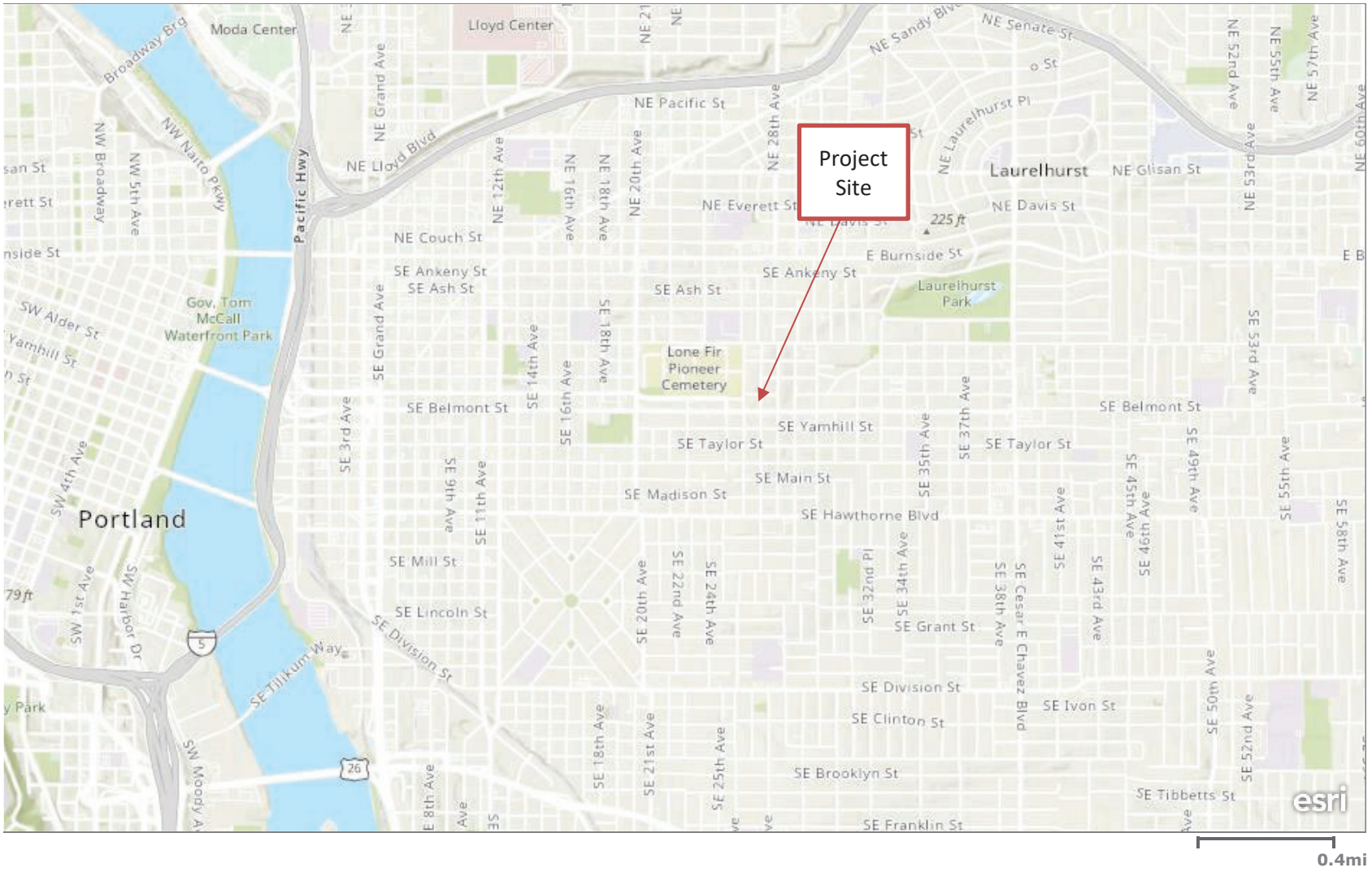

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FIGURE 1- Vicinity Map
August 2021
Shortstack
2755 SE Belmont Street
Portland, Oregon 97214

Cascade Environmental Solutions

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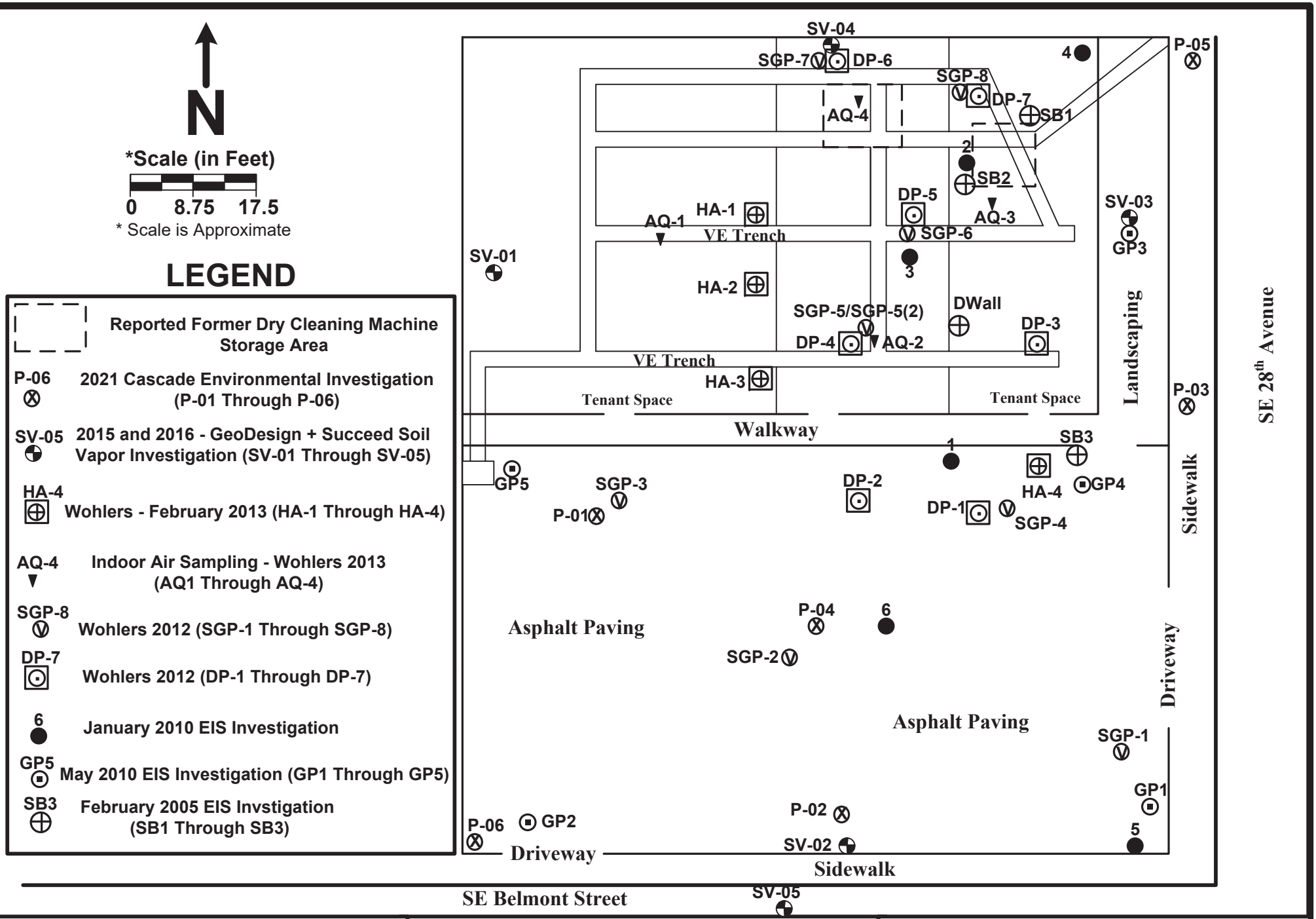
Figure 2- Site Map
2755 SE Belmont Street
Portland, Oregon 97232

August 2021
CASCADE ENVIRONMENTAL SOLUTIONS



Cascade Environmental Solutions PO Box 83294 8420 N. Ivanhoe Street Portland, Oregon 97203-4826	**FIGURE 3** SITE FEATURES MAP	COMMERCIAL PROPERTY 2721 – 2731 SE Belmont Street Portland, Oregon