

Targeted Site Investigation Work Plan

1208 N River Street

Portland, Oregon 97227

ODEQ LUST #26-98-1133

ACC Project Number: 10117-003.00

Prepared for:

Albina Gateway, LLC

Attn: Michael Bernert

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February 27, 2025

Prepared by:



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1.0 INTRODUCTION

ACC Environmental Consultants (ACC) has been contracted by Albina Gateway, LLC (Client) to prepare a work plan for performing additional subsurface investigation at the property located at 1280 N River Street in Portland, Oregon (the Site). Past environmental investigations performed at the Site have documented the presence of petroleum-containing soil (PCS) in the northwest corner of the Site adjacent to a 10,000-gallon underground storage tank (UST) that was decommissioned in place in 1999. The release from the UST was assigned to the Oregon Department of Environmental Quality (ODEQ) Leaking Underground Storage Tank (LUST) database as file number LUST 26-98-1133, which is currently unresolved with ODEQ.

Remaining soil at the Site contains concentrations of diesel-range petroleum hydrocarbons (DRPH) that exceed ODEQ Risk-Based Concentrations (RBCs) for direct contact by construction and excavation workers. This work plan has been developed to gather more information on the vertical and lateral extents of the PCS. More detailed information will be used for evaluation of future remedial actions.

2.0 SITE BACKGROUND

Background documents were provided to ACC by the client for review. A detailed summary of past environmental assessment at the Site is provided below. Applicable documents are attached in Appendix A.

2.1 LUST Site Investigations^{1,2,3}

From October 2022 to July 2024, K&S Environmental, Inc. (K&S) conducted three separate site investigations in an effort to fully characterize the soil and groundwater contamination suspected to have been sourced from a UST release previously reported in 1998. A work plan was submitted to Kevin Dana at ODEQ and approved prior to the execution of each phase of site characterization.

Borings were advanced at 14 locations across the Site, within the north adjacent River Street right-of-way (ROW), and the north adjacent property. Borings B-1 through B-4 were advanced in 2022 on-site around the area to the south of the AST. Borings B-5 through B-7 and B-11 were advanced north adjacent to the Site and AST, located along the southern side of the River Street ROW. Borings B-8

¹ *Subsurface Investigation Report, Property Located at 1208 N River Street, Portland, OR, LUST 26-98-1133, prepared by K&S Environmental, Inc. for R.B. Pamplin Corporation, dated October 8, 2022*

² *Subsurface Investigation Report II, Property Located at 1208 N River Street, Portland, OR, LUST 26-98-1133, prepared by K&S Environmental, Inc. for R.B. Pamplin Corporation, dated October 13, 2023*

³ *Subsurface Investigation Report III, Property Located at 1208 N River Street, Portland, OR, LUST 26-98-1133, prepared by K&S Environmental, Inc. for R.B. Pamplin Corporation, dated July 12, 2024*

through B-10 were located on-site further south of the AST. Borings B-12 through B-14 were located on the north adjacent property across River Street, in the assumed up-gradient position from the Site.

Borings B-1, B-2, and B-8 through B-14 had relatively minor or no detections of GRPH and DRPH in both soil and groundwater. Boring B-3 did not contain GRPH or DRPH in the soil sample collected at 10-foot bgs, however, the groundwater sample contained elevated DRPH concentrations. Borings B-4 through B-7, located generally east of the AST, exhibited the highest on-site concentrations of DRPH in soil at 10-foot bgs and groundwater samples. Indications of potential light non-aqueous phase liquid (LNAPL) diesel product was noted at boring B-4 during installation and sampling. Groundwater was present at a depth ranging from 23- to 25-foot bgs during all three site investigations.

DRPH concentrations in soil detected at boring locations B-4 and B-7 exceed the RBC protective of ingestion, dermal contact, and inhalation (RBC_{ss}) for construction workers, but do not exceed RBC_{ss} for occupational and excavation worker receptors. The soil samples were both collected at depths of 10 feet bgs. In boring B-4, a soil sample collected at a depth of 24 feet bgs had a detected DRPH concentration of 3,110 milligram per kilogram (mg/kg), which is below the RBC_{ss} for construction worker receptors of 4,600 mg/kg.

DRPH and GRPH concentrations in groundwater do not exceed the applicable RBCs for the Site. Groundwater concentrations currently exceed the RBC_{wi} for vapor intrusion into buildings in an occupational setting, which is 520 micrograms per liter ($\mu\text{g/L}$) for GRPH, 1,700 $\mu\text{g/L}$ for DRPH, and 1,500 $\mu\text{g/L}$ for ORPH. No buildings are present at the Site, but if permanent structures are built on the Site in the future, site conditions would be required to be re-evaluated. Groundwater concentrations do not exceed RBC_{we} , protective of construction and excavation workers handling groundwater present in an excavation. Furthermore, excavations to 23 feet in depth at the Site are highly unlikely to occur. Groundwater at the Site is not beneficially used, and water is supplied to the Site and surrounding properties by the City of Portland municipal water system.

K&S concluded that contamination detected at the Site consists primarily of gasoline and diesel-range petroleum hydrocarbons, and appears to be concentrated in the area east of the current AST, defined by boring locations B-4 through B-7. Remaining concentrations detected down-gradient and up-gradient of the Site are minor, and contamination sourced from the Site has not impacted the north adjacent property. Low-level detections of DRPH in B-1, and B-8 through B-14 appear to be at least partially representative of a larger scale regional contamination issue from historical surrounding heavy industrial activities.

K&S stated that the UST and AST were decommissioned and had not been used in decades, and that the release of petroleum is historical. K&S stated that this is demonstrated by the lack of volatiles detected in soil and groundwater samples.

2.2 ODEQ Correspondences

In an August 14, 2024 ODEQ email to representatives of Albina Gateway, LLC, ODEQ agreed that groundwater contamination had been fully defined, and that minor diesel concentrations in groundwater samples collected upgradient and downgradient from the UST were similar and likely the result of a larger, area-wide contaminant plume associated with the industrial land use in the surrounding area.

ODEQ noted that soil concentrations at the Site remain an issue and are an impediment to regulatory closure. DRPH concentrations of 13,300 mg/kg and 12,900 mg/kg at boring locations B-4 and B-7, respectively, exceed the ODEQ RBC of 4,600 mg/kg DRPH for direct contact by construction workers. The soil samples were collected at a depth of 10-feet bgs, below where typical construction work occurs, but ODEQ stated that either a remedial action must be completed, or an Easement & Equitable Servitude (EES) recorded before ODEQ could issue an NFA determination.

3.0 SUBSURFACE INVESTIGATION ACTIVITIES

A discussion of the proposed Site activities is below.

3.1 Pre-Field Investigation Activities

3.1.1 Permits

No permits will be required for the safe completion of field activities for this scope of work.

3.1.2 Health and Safety Plan

ACC will prepare a Site-specific health and safety plan (HASp) to govern health and safety protocols during this investigation. Work will be performed using Occupational Safety and Health Administration (OSHA) Level D work attire consisting of hard hats, safety glasses, protective gloves, high visibility safety vest, and protective boots.

3.1.3 Underground Utility Locates

Prior to the commencement of subsurface activities, a public utility notification will be requested through the Oregon One Call service. In addition, a private locating company will be contracted to locate private utility lines and infrastructure, and clear boring locations of potential underground conflicts.

3.2 Field Activities

An Oregon-licensed and insured drilling subcontractor will be hired to complete drilling services. Up to four borings (ACC-1 through ACC-4) are proposed for advancement at the Site. Each boring will be advanced using a GeoProbe® 7720DT track-mounted direct-push drill rig. Borings are proposed to be drilled at locations south and east of the current AST. Proposed boring locations are shown on a labeled figure in Appendix B.

Each boring will be advanced in five-foot intervals to refusal, first encountered groundwater, or a maximum depth of 30 feet bgs. Continuous soil samples will be collected using a five-foot long “macro” core tube sampler equipped with new, clear polyethylene liners. Soil cores will be inspected for lithologic composition, presence of water, and field screened for the presence of petroleum hydrocarbons (stain, odor, and organic vapors with a photo-ionization detector [PID]). Boring logs detailing the lithology, field screening results, and sample depths will be included in the report. Groundwater is expected to be encountered at an approximate depth of 25-feet bgs.

Field screening will consist of volatile organic vapor measurements using a PID, sheen testing, visual observations (staining, etc.), and olfactory observations. A portion of each soil sample will be placed in a sealable plastic bag. The tip of the PID will be inserted into the plastic bag in the airspace above the soil sample and the PID measurement will be recorded. The PID will be calibrated before use at the Site to a test gas standard consisting of 100 ppmv isobutylene. Sheen testing will consist of placing a small portion of soil in clear water and observing the water for the presence of hydrocarbon sheen.

Selected soil samples will be submitted to the laboratory boring based on sampling objectives (i.e., depth, soil type) and field screening results. The selected soil samples will be removed from the polyethylene tubing using a new pair of disposable gloves and placed directly into labeled laboratory prepared jars and sealed with Teflon-lined lids. Soil samples will be placed into laboratory supplied containers (utilizing 5035A field preservation) and immediately placed in an ice filled cooler along with chain-of-custody documentation for delivery to APEX Laboratories in Tigard, Oregon.

Drilling and sampling tools will be decontaminated between boring locations using an Alconox® and water mixture and rinsed with clean water.

3.3 Laboratory Analysis

Up to twelve soil samples and four groundwater samples will be collected for laboratory analysis. Soil samples will be analyzed for the following suite of parameters:

- GRPH by Northwest Method NWTPH-Gx.
- DRPH and ORPH by Northwest Method NWTPH-Dx.
- Benzene, toluene, ethylbenzene, and total xylenes by EPA Method 8260D.

- Soil samples utilized EPA Method 5035A for the preservation of volatiles.

3.4 Reporting

ACC will prepare a *Targeted Site Investigation Report* describing field activities, laboratory results, risk screening, and conclusions. The report will include data tables, figures, and copies of laboratory reports. The report will be prepared in draft and final form and will be provided to Albina Gateway, LLC for comment before being submitted to ODEQ.

4.0 QUALIFICATIONS

ACC's services will be performed in a manner consistent with generally accepted practices of the profession undertaken in similar studies in the same geographical area during the same time period. ACC makes no warranties, either expressed or implied, regarding the findings, conclusions or recommendations. Please note that ACC does not warrant the work of laboratories, regulatory agencies, or other third parties supplying information used in the preparation of the report.

Findings and conclusions resulting from these services are based upon information derived from the on-site activities and other services performed under this scope of work; such information is subject to change over time. Certain indicators of the presence of hazardous substances, petroleum products, or other constituents may have been latent, inaccessible, unobservable, nondetectable or not present during these services, and we cannot represent that the site contains no hazardous substances, toxic materials, petroleum products, or other latent conditions beyond those identified during this monitoring. Subsurface conditions may vary from those encountered at specific sampling locations or during other surveys, tests, assessments, investigations, or exploratory services; the data, interpretations and findings are based solely upon data obtained at the time and within the scope of these services.

This report will be intended for the sole use of **Albina Gateway, LLC**. This report may not be used or relied upon by any other party without the written consent of Albina Gateway, LLC or ACC Environmental Consultants. The scope of services performed in execution of this planned evaluation may not be appropriate to satisfy the needs of other users, and use or re-use of this document or the findings, conclusions, or recommendations is at the risk of said user.

The conclusions presented in this report will be based upon subsurface sampling performed at selected locations and depths. There may be conditions between borings or samples that differ significantly from those presented in this report and which cannot be predicted by this study.

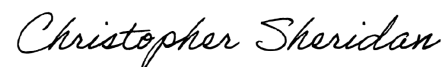
Signature:

Work Plan Prepared By:



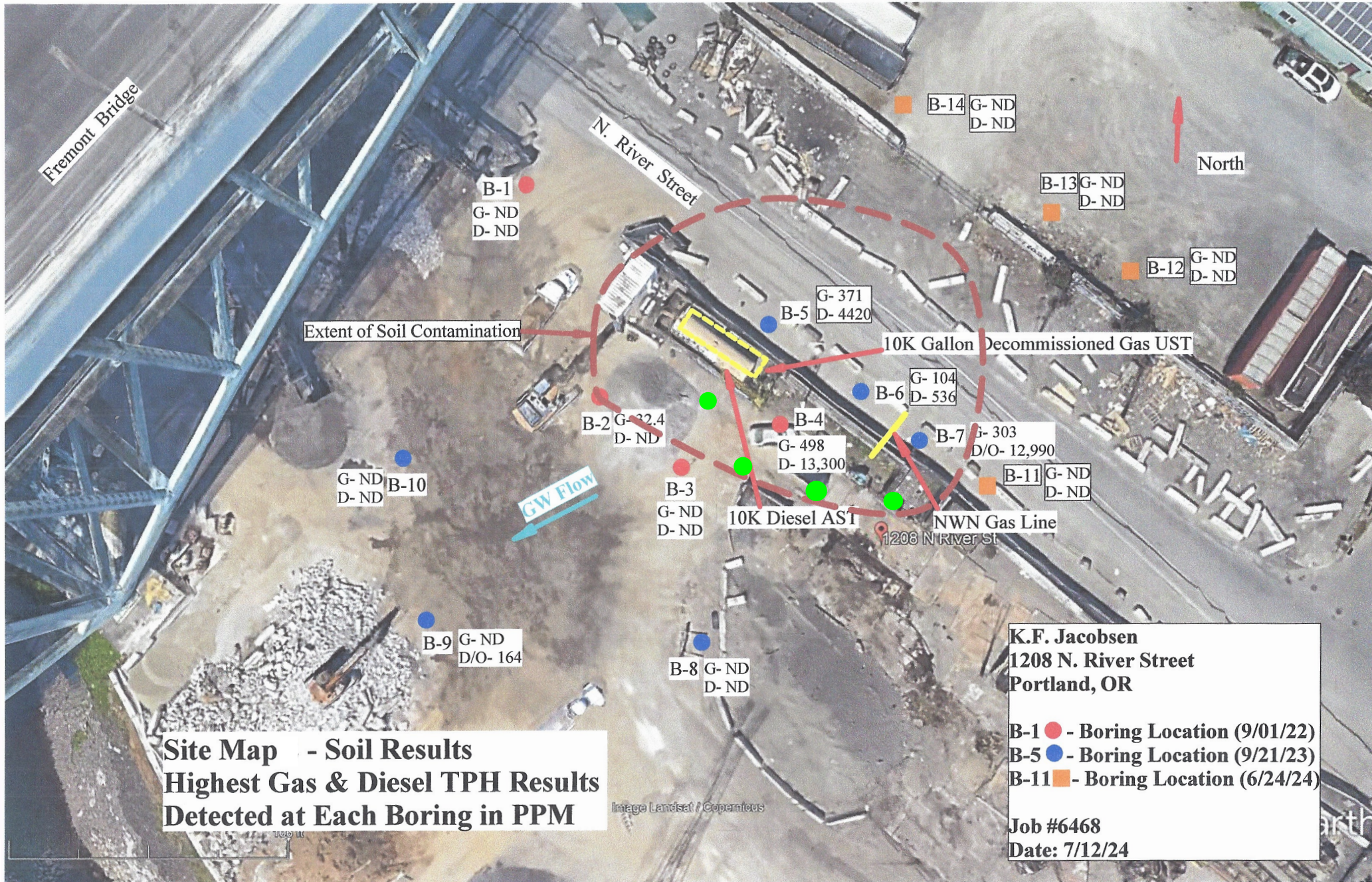
Chris Daschel, R.G.
Project Geologist

Work Plan Reviewed By:



Chris Sheridan, R.G.
Principal Geologist

Figure 1 - Proposed Boring Locations



● Proposed Boring Locations (ACC)

APPENDIX A
APPLICABLE SITE BACKGROUND DOCUMENTS



4475 SW Scholls Ferry Rd., #256 ▲ Portland, OR 97225
(503)291-1454 ▲ Fax (503)291-5425

July 12, 2024

R.B. Pamplin Corporation
6505 SE Lake Road
Portland, OR 97222-2161

Attn: Randy Steed

Re: Subsurface Investigation Report III
Property Located at 1208 N. River Street, Portland, OR
DEQ File No. 26-98-1133

Dear Mr. Steed:

This report presents the field observations, drilling methods, and analytical laboratory results for the work associated with the installation and sampling of four borings at the above referenced property. Soil and groundwater samples were collected from the four borings and were analyzed for gasoline and diesel total petroleum hydrocarbons (TPH) and associated gasoline and diesel constituents. The work was completed in accordance with K&S Environmental, Inc.'s (K&S) Work Plan dated February 21, 2024 that was designed to determine the lateral extent of the soil and groundwater contamination in the upgradient direction of the subject site. The Work Plan was approved by Kevin Dana of the Department of Environmental Quality (DEQ) prior to beginning the work.

Background

In February, 1999, K&S decommissioned a 10,000 gallon gasoline UST at the former K.F. Jacobsen facility located at 1208 N. River Street in Portland, OR. A K&S sampling plan was approved by DEQ and was implemented by K&S prior to the decommissioning of the tank in place. The results of the sampling plan detected diesel and oil range total petroleum hydrocarbons (TPH) in the subsurface soil and groundwater adjacent to the 10,000 gallon gasoline UST. A notification of a release was submitted to the DEQ and LUST Number 26-98-1133 was assigned to the site.

On September 1, 2022, K&S installed four shallow soil borings around the decommissioned 10,000 gallon gasoline UST. Soil and groundwater samples were collected from borings B-1, B-2, B-3 and B-4. The soil and groundwater samples collected on 9/01/22 detected diesel and/or gasoline contamination in the groundwater at all four boring locations. The groundwater level measured at the time of the 9/01/22 subsurface investigation was measured at approximately 23 feet bgs. The diesel concentrations detected in the groundwater at borings B-1 and B-2 were relatively low, while the diesel concentrations at borings B-3 and B-4 were extremely high. No gasoline TPH were detected in the groundwater at borings B-1 and B-2, while gasoline range TPH were detected in borings B-3 and B-4 at elevated concentrations. The possible presence of free phase diesel product was noted in the soil and groundwater during the installation and

sampling of boring B-4. Results of the 9/01/22 investigation are presented in K&S's 'Subsurface Investigation Report' dated October 8, 2022.

The source of the diesel and gasoline TPH contamination detected during the 9/01/22 sampling event was inconclusive, and additional subsurface investigation was requested. A Work Plan to install six additional borings and collect additional soil and groundwater samples at the site was generated by K&S. The 11/20/22 Work Plan was submitted to the DEQ and was approved by the DEQ project manager, Kevin Dana, on April 18, 2023. Implementation of the Work Plan was authorized by the client on August 24, 2023, and the proposed work was scheduled.

On September 21, 2023, K&S installed borings B-5 through B-10 at the site. Reportable levels of TPH were detected in soil and groundwater samples collected from the six borings installed. The contamination detected during the 9/21/23 investigation was concentrated in the area of borings B-4, B-5, B-6 and B-7. The upgradient extent and the source(s) of the contamination beneath N. River Street remained inconclusive and additional investigation was proposed. A Work Plan to install borings B-11, B-12, B-13 and B-14 upgradient of the subject site was submitted to DEQ for approval. The 2/21/24 Work Plan was approved by DEQ and the installation of borings B-11, B-12, B-13 and B-14 was scheduled.

Procedures

Since boring B-11 was installed in the City right of way, a permit to complete the drilling in N. River Street was obtained from the City of Portland Bureau of Transportation prior to performing the work. A copy of the City Permit is included with this report. Borings B-11, B-12, B-13 and B-14 are located as presented in K&S's 2/21/24 Work Plan. All boring locations are noted on the two attached Site Maps.

On June 24, 2024, K&S arrived at the site to install borings B-11, B-12, B-13 and B-14 and collect soil and groundwater samples for chemical analyses. The borings were installed using a track mounted GeoProbe push probe drill rig. Soil samples were continually inspected for evidence of petroleum contamination during installation of the borings.

Soil samples GT19, GT20, GT21 and GT22 were collected for chemical analyses from borings B-11, B-12, B-13 and B-14 near the soil water interface at a depth of 25 feet below ground surface (bgs). The four borings were completed as temporary monitoring wells to facilitate the collection of groundwater samples at each boring location. The temporary wells installed in all 4 borings consisted of ¾ Schedule 40 PVC casing with machine slots from the bottom of each borehole to 20 feet from the surface, and with solid casing from 20 feet to the surface. Subsequent to sample collection, the temporary wells were removed and the boreholes were filled with bentonite and the surface was restored. Boring logs and well construction details are included with this report.

The soil samples collected for chemical analyses were packed into 4 ounce EPA approved glass jars using disposable Nitrile gloves. The groundwater samples were collected using a low flow peristaltic pump. The water in each well was purged to reduce turbidity prior to collecting the water sample. The water samples were placed into 1 liter amber glass bottles for semi-volatile analyses and into 40 ml VOAs for volatile analyses. All samples were labeled and placed on ice for transport to Apex Laboratories in Tigard, OR under completed chain of custody.

Subsurface Conditions: Boring B-11 was installed in asphalt on the southwest side of N. River Street and borings B-12, B-13 and B-14 were located just inside the southwest property line at the property located across the street from the subject site. Borings B-12, B-13 and B-14 were

located in dirt and gravel on the private property located at 2223 N. Randolph Avenue. Permission was obtained from the property owner prior to completing the drilling work.

Soil encountered beneath the surface at each boring location displayed heterogeneous conditions consisting of interbedded gravel with gray or brown silt with occasional wood debris from the surface to the total depth explored in each boring. Depth to groundwater was measured at between 23-24 feet bgs in each of the temporary wells installed in the borings. No visual or olfactory evidence of contamination was noted during the installation or sampling of the four borings.

Chemical Results: The soil samples preserved for chemical analyses were analyzed for total petroleum hydrocarbons (TPH) by Northwest Methods NWTPH-Dx and NWTPH-Gx and for volatile organic compounds (VOCs) by EPA Method 8260D. Samples GT19, GT20, GT21 and GT22 did not contain reportable levels of TPH diesel, TPH gasoline or VOCs. Results of the soil samples collected at the site by K&S are summarized below in Tables 1 and 2.

Water samples GW11, GW12, GW13 and GW14 were analyzed for TPH by NWTPH-Gx and NWTPH-Dx, for PAHs by EPA Method 8270 and for VOCs by EPA Method 8260. The results of all water samples are summarized below in Tables 3, 4 and 5. All soil and groundwater sample results with reportable levels are identified in the tables with bold italics.

Table 1
TPH Results of Soil Samples (reported in ppm)

Sample ID	Location/Depth	NWTPH-Gx	NWTPH-Dx (diesel/oil)
GT19	Boring B-11, 25 ft.	<8.96	<25.7/<51.5
GT20	Boring B-12, 25 ft.	<8.69	<25.3/<50.6
GT21	Boring B-13, 25 ft.	<8.60	<24.5/<49.1
GT22	Boring B-14, 25 ft.	<8.92	<25.8/<51.5

Table 2
Soil VOC Results

VOCs	GT19	GT20	GT21	GT22
Benzene	ND	ND	ND	ND
Toluene	ND	ND	ND	ND
Ethylbenzene	ND	ND	ND	ND
Xylenes	ND	ND	ND	ND
MTBE	ND	ND	ND	ND
Naphthalene	ND	ND	ND	ND
EDB	ND	ND	ND	ND
EDC	ND	ND	ND	ND
Isopropylbenzene	ND	ND	ND	ND
1,2,4-Trimeth	ND	ND	ND	ND
1,3,5-Trimeth	ND	ND	ND	ND

ND – None detected at or above reportable levels

Ppm – parts per million

Table 3
TPH Results of Groundwater Samples (reported in ppm)

Sample ID, Location	NWTPH-Gx (ppm)	NWTPH-Dx (ppm) (diesel/oil)
GW11, Boring B-11	<0.100	<i>0.232</i> / <i><0.160</i>
GW12, Boring B-12	<0.100	<i>0.321</i> / <i><0.151</i>
GW13, Boring B-13	<0.100	<i>0.389</i> / <i><0.152</i>
GW14, Boring B-14	<0.100	<i>0.416</i> / <i><1.55</i>

Table 4
Groundwater PAH Results (reported in ppb)

PAHs	GW11	GW12	GW13	GW14
Acenaphthene	<i>0.130</i>	<0.0377	<0.0381	<0.0388
Acenaphthylene	<0.0400	<0.0377	<0.0381	<0.0388
Anthracene	<0.0400	<0.0377	<i>0.0406</i>	<i>0.0448</i>
Benz(a)anthracene	<0.0400	<0.0377	<0.0381	<0.0388
Benzo(a)pyrene	<0.0400	<0.0377	<i>0.0543</i>	<0.0388
Benzo(b)fluoranthene	<0.0400	<0.0377	<i>0.0730</i>	<0.0388
Benzo(k)fluoranthene	<0.0400	<0.0377	<0.0381	<0.0388
Benzo(g,h,i)perylene	<0.0400	<0.0377	<i>0.0539</i>	<0.0388
Chrysene	<0.0400	<0.0377	<i>0.0487</i>	<0.0388
Dibenz(a,h)anthracene	<0.0400	<0.0377	<0.0381	<0.0388
Fluoranthene	<i>0.0694</i>	<0.0377	<i>0.0436</i>	<0.0388
Fluorene	<i>0.0744</i>	<0.0377	<0.0381	<0.0388
Indeno(1,2,3-cd)pyrene	<0.0400	<0.0377	<i>0.0506</i>	<0.0388
Naphthalene	<i>0.344</i>	<0.0755	<0.0381	<0.0777
Phenanthrene	<i>0.192</i>	<0.0377	<0.0381	<0.0388
Pyrene	<i>0.0699</i>	<0.0377	<i>0.0591</i>	<0.0388

Table 5
Groundwater VOC Results (reported in ppb)

VOCs	GW11	GW12	GW13	GW14
Benzene	<2.00	<2.00	<2.00	<0.200
Toluene	<i>1.82</i>	<1.00	<1.00	<1.00
Ethylbenzene	<0.500	<0.500	<0.500	<0.500
Xylenes	<1.50	<1.50	<1.50	<1.50
MTBE	<1.00	<1.00	<1.00	<1.00
Naphthalene	<5.00	<5.00	<5.00	<5.00
EDB	<0.500	<0.500	<0.500	<0.500
EDC	<0.400	<0.400	<0.400	<0.400
Isopropylbenzene	<1.00	<1.00	<1.00	<1.00
1,2,4-Trimeth	<1.00	<1.00	<1.00	<1.00
1,3,5-Trimeth	<1.00	<1.00	<1.00	<1.00

ND – None detected at or above reportable levels

ppm – parts per million or mg/kg or ml/L

ppb – parts per billion or ug/L

Table 6
Groundwater RBCs (ppb) – Occupational Receptor

COPC	Highest Concentration	VI to Outdoor Air	Groundwater in Excavation	Ingestion and Inhalation from Tapwater
TPH as Gas	6990 (GW4)	>s	14,000	450
TPH as Diesel	91,000 (GW5)	>s	>s	430
Benzene	23.0 (GW4)	14,000	1800	2.1
Toluene	4.10 (GW4)	>s	220,000	6300
Ethylbenzene	9.38 (GW6)	43,000	4500	6.4
Xylenes	10.2 (GW5)	>s	23,000	830
Naphthalene	0.119 (GW8)	16,000	500	0.72
Isopropylbenzene	29.0 (GW5)	N/A	N/A	2000
1,2,4-Trimeth	13.9 (GW5)	>s	6300	250
1,3,5-Trimeth	1.99 (GW5)	>s	7500	280

>s – This groundwater RBC exceeds the solubility limit

Summary

On June 24, 2024, K&S installed four soil borings at the UST cleanup site located at 1208 N. River Street in Portland, OR. The 6/24/24 investigation was preceded by two subsurface drilling and sampling programs completed by K&S on September 1, 2022 and September 21, 2023. The 9/01/22 investigation consisted of the installation and sampling of four borings adjacent to the gasoline UST and diesel AST at the site. Results of the 9/01/22 investigation are presented in K&S's 'Subsurface Investigation Report' dated October 8, 2022. The 9/21/23 investigation appeared to adequately define the lateral extent of the contamination in the northwest, south and southwest directions. Results of the 9/21/23 investigation are presented in K&S's 'Subsurface Investigation Report II' dated October 13, 2023. The investigative drilling and sampling program completed on 6/24/24 was designed to determine the lateral extent of the subsurface contamination in the upgradient direction of the subject site.

The contamination detected the site consists predominantly of diesel and gasoline TPH and appears to be concentrated in the area of borings B-4, B-5, B-6 and B-7. The remaining subsurface contamination within the subject property does not appear to be adversely impacting adjacent properties, including the property located across the street at 2223 N. Randolph Avenue. Based on the sample results collected to date, the subsurface contamination in the area of the subject site is limited in extent, and the low level diesel TPH contamination detected in borings B-1, B-8, B-9, B-11, B-12, B-13 and B-14 may be at least partially representative of a larger regional contamination issue from historical industrial uses of other properties along the Willamette River and upgradient of the site.

Any ASTs or USTs located at the site have been out of service and/or decommissioned for several decades, and any future migration of contamination from the site is likely very limited. The suspected age of the release is supported by the lack of volatile constituents in relation to the concentration of semi-volatile constituents (TPH) detected in the same samples.

All the constituents of concern within the contaminant plume appear to be within their respective risk-based concentrations (RBCs) for the applicable pathways at the site. See Table 6 above for a comparison of the highest COPC concentrations detected at the site with their respective RBCs. The exceptions to this are the diesel TPH concentrations detected in borings B-3 and B-4 on the subject property and in borings B-5 and B-6 located on N. River Street. The groundwater TPH results at these four locations exceed their RBC for the 'Groundwater in Excavation' pathway. To address this pathway, prior to any excavation in the areas of these borings, a Contaminated

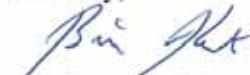
Media Management Plan should be developed and then implemented during subsurface excavation work. The low level PAH constituents detected at the site were all within their respective RBCs for the applicable pathways, and were not included in Table 6.

The diesel TPH results at borings B-3, B-4, B-5 and B-6 also exceed the RBC for 'Vapor Intrusion (VI) to Outdoor Air' pathway. Considering the current use of the property as a concrete recycling and gravel production facility that continually utilizes several pieces of heavy equipment in a heavy industrial use setting, the VI to outdoor air concern appears to be a non-factor for this site under current conditions. Since no buildings currently occupy the site or are located within 100 feet of the property, the VI to Indoor Air pathway is not considered a complete pathway under current site conditions at the site. If any permanent structures are ever built on the site, the risk at the site would need to be re-evaluated.

A review of Water Resources Department's data base indicates no water supply wells are located at the site or within several blocks of the site, and the area is supplied with water by the City of Portland Water Bureau. No beneficial water use appears threatened by the remaining impacted soil and groundwater at the site.

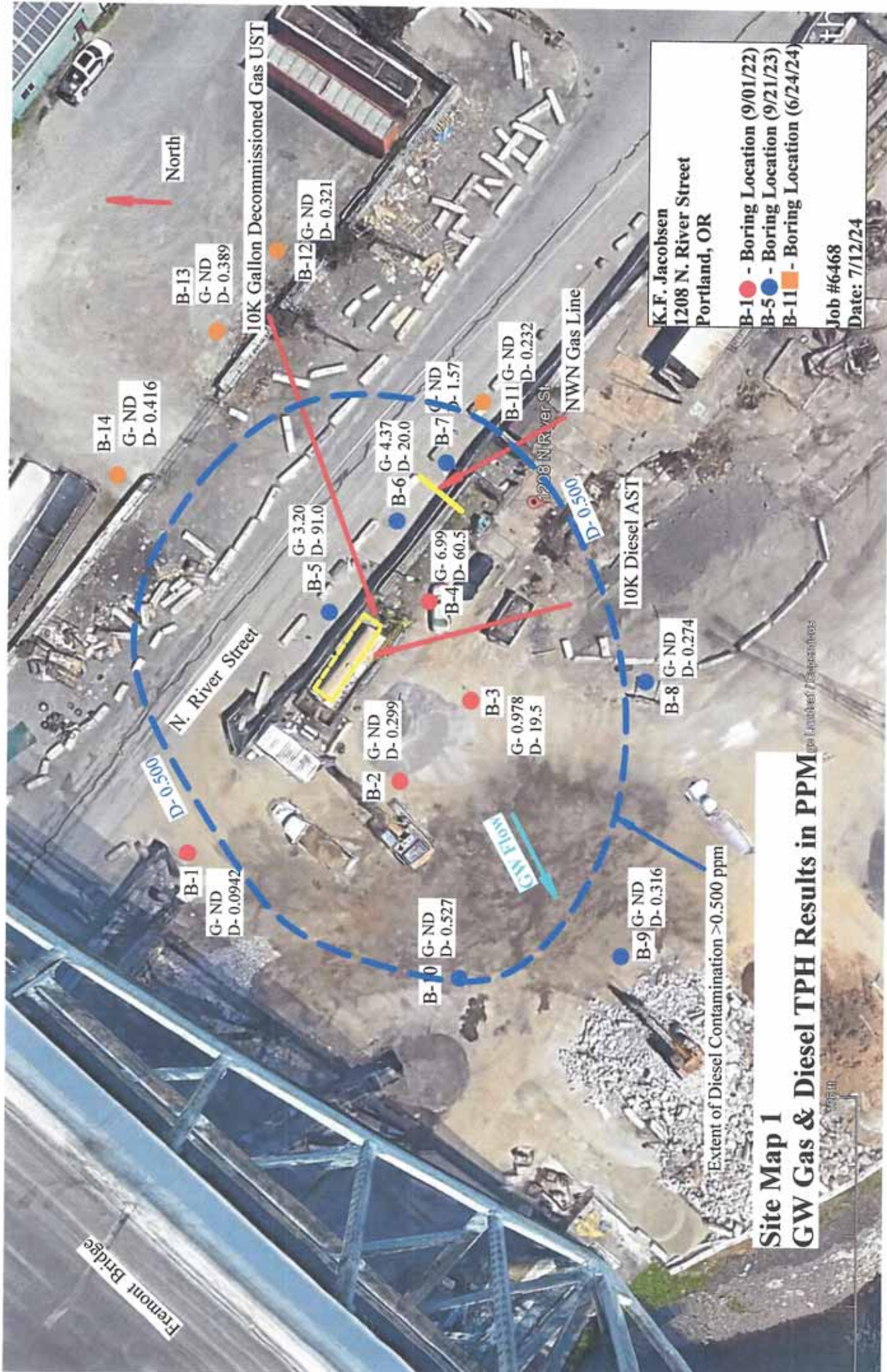
Based upon the limited extent of the subsurface contamination and the possibility of significant future contaminant migration being unlikely, K&S is requesting the Department consider the issuance of a 'No Further Action' determination for the property located at 1208 N. River Street. Please review the findings presented in this report and contact me with any questions you may have.

Sincerely,



Bill Knutson, P.E.
Environmental Engineer





K.F. Jacobsen
 1208 N. River Street
 Portland, OR
 B-1 ● - Boring Location (9/01/22)
 B-5 ● - Boring Location (9/21/23)
 B-11 ■ - Boring Location (6/24/24)
 Job #6468
 Date: 7/12/24

Site Map 1
GW Gas & Diesel TPH Results in PPM

Extent of Diesel Contamination >0.500 ppm

Fremont Bridge

North

B-14
G-ND
D-0.416

B-13
G-ND
D-0.389

10K Gallon Decommissioned Gas UST

B-12
G-ND
D-0.321

G-3.20
D-91.0

B-5
G-ND
D-0.299

B-2
G-ND
D-0.299

B-10
G-ND
D-0.527

B-4
G-6.99
D-60.5

G-4.37
D-20.0

B-6
G-ND
D-20.0

B-3
G-0.978
D-19.5

B-7
G-ND
D-1.57

B-9
G-ND
D-0.316

B-11
G-ND
D-0.232

D-0.500

D-0.500

D-0.500

D-0.500

D-0.274

D-0.274

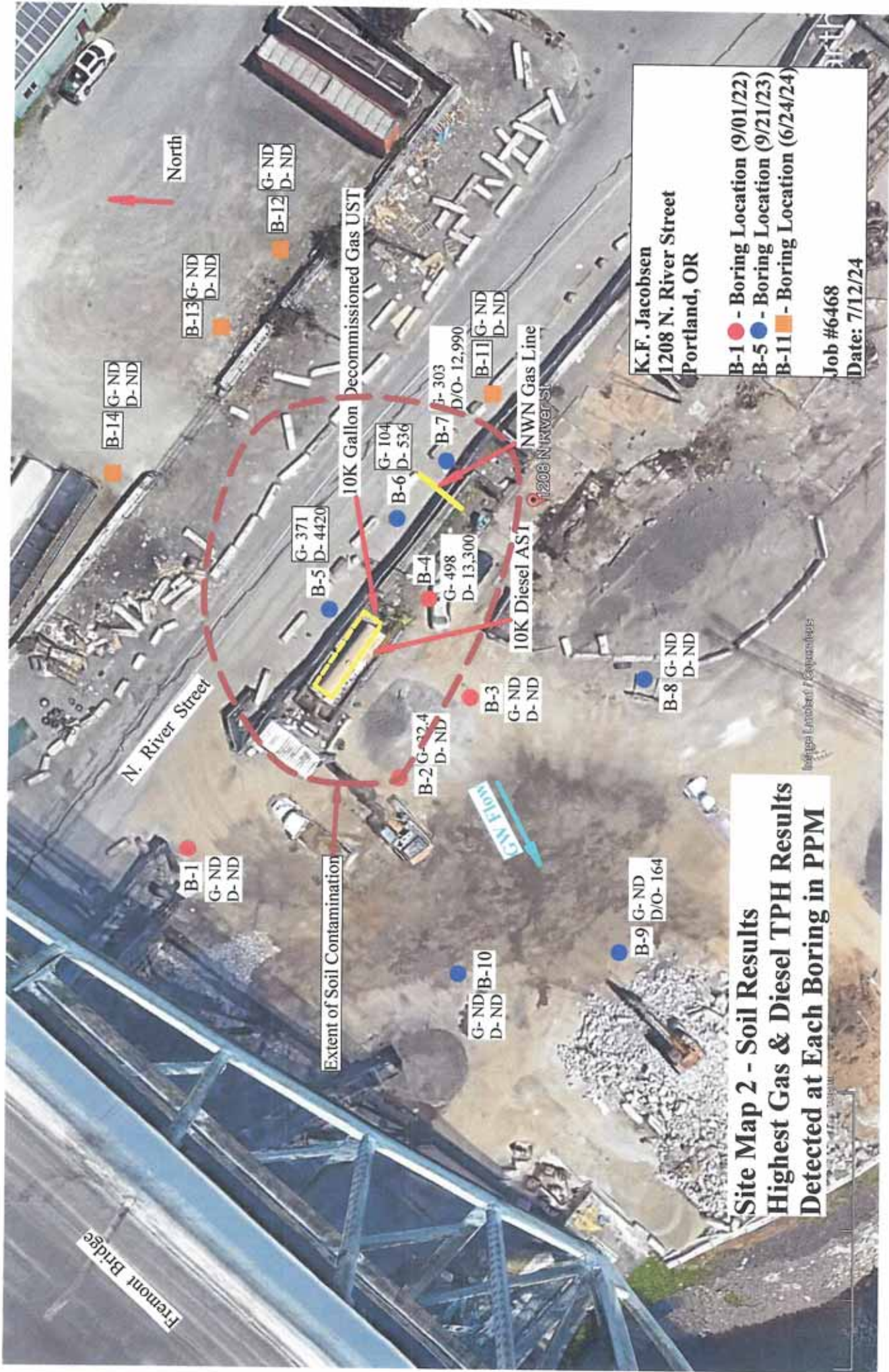
NWN Gas Line

10K Diesel AST

1208 N River St

N. River Street

Geoplot 20240712



K.F. Jacobsen
 1208 N. River Street
 Portland, OR

B-1 ● - Boring Location (9/01/22)
 B-5 ● - Boring Location (9/21/23)
 B-11 ■ - Boring Location (6/24/24)

Job #6468
 Date: 7/12/24

**Site Map 2 - Soil Results
 Highest Gas & Diesel TPH Results
 Detected at Each Boring in PPM**

Extent of Soil Contamination

10K Gallon Decommissioned Gas UST

10K Diesel AST

NWN Gas Line

North

N. River Street

Fremont Bridge

GIVE FLOW

Geological Engineering & Construction, Inc.

B-14

G-ND
D-ND

B-13

G-ND
D-ND

B-12

G-ND
D-ND

B-14

G-ND
D-ND

G-371
D-4420

B-5

G-104
D-536

B-6

F-303
D/O- 12,990

B-7

G-ND
D-ND

B-11

G-498
D-13,300

B-4

G-ND
D-ND

B-3

G-ND
D-ND

B-8

G-ND
D-ND

B-1

G-32.4
D-ND

B-2

G-ND
D-ND

B-10

G-ND
D/O- 164

B-9

Called in 6/20/24

Final approval Inspector/Date: Partial Approval Approved w/ corrections Not approved Cancelled



Test Bore / Core
CITY OF PORTLAND, OREGON
BUREAU OF TRANSPORTATION
DEVELOPMENT AND CAPITAL PROGRAM

Permit Number: TR-24-026
Performance Bond:
Issue Date: 6/20/2024
Void After: 6/20/2025
Insurance: 5047285
Street Bond: 3928177

Revocable Permit to Use Dedicated Street Areas
at 1208 N River St.

- Permittee shall be responsible for obtaining an approved traffic/pedestrian control plan...
Permittee must provide notification of proposed work schedule and request inspection...

The permittee applies for a revocable permit, in accordance with the attached conditions, provisions of Portland City Code Title 17 and the City Charter, for use of the street area on:

N River St, from Randolph Ave to FREMONT BRG

To drill # test bores, #in. in diameter, #ft. deep.

Special Notes / Comments

- SSM If tree roots will be disturbed during work, contact the Urban Forester to schedule an inspection...
PWB Contractor must locate and maintain a minimum 3' skin to skin horizontal separation from any Portland Water Bureau infrastructure.

Table with 3 columns: Permittee, Contractor, Primary Contact. Includes contact info for K&S Environmental, Cascade Drilling, and Bill Knutson.

Table with 4 columns: Date, Line Item, Amount, Balance. Shows payment entries for K&S Environmental, Inc. on 6/20/2024.

APPROVED BY ZAYN ARRAKI
CONTINGENT UPON COVERING CITY CODE & FRANCHISES
OF THE CITY OF PORTLAND BUREAU OF TRANSPORTATION
Jun 20 2024

Location Map



See Attached Site Map

Project No. 6468
 Logged By: BK
 Drilling Method: Push Probe
 Sample Method: continuous
 Casing Type: Sch 40 PVC
 Slot Size: 0.020"

Client: R.B. Pamplin
 Date: 6/24/24
 Location: Portland, OR
 Hole Diameter: 2 inch
 Well Diameter: 3/4 inch

*K & S
 Environmental, Inc.*

Boring B-11

Well/Boring Completion		Depth in Feet	Sample	Graphic	Sample #	Lithology/Remarks
 <p>2" Borehole</p> <p>Solid Casing</p> <p>3/4" Diameter Casing w/.020 slots</p>	<p>Asphalt</p>	<p>3</p> <p>6</p> <p>9</p> <p>12</p> <p>15</p> <p>18</p> <p>21</p> <p>24</p> <p>27</p> <p>30</p> <p>33</p> <p>36</p> <p>39</p> <p>42</p>			<p>▼ GT19</p>	<p>Asphalt</p> <p>Silty Gravel .5-2 ft.</p> <p>Interbedded silty clay & wood debris 2-13' gray w/no odor</p> <p>Gray Silty Clay w/no odor 13-24 ft.</p> <p>gray sandy silt 24-27 ft. no odor</p> <p>brown silty clay 27-35 ft. water at 23 ft.</p>

Location Map

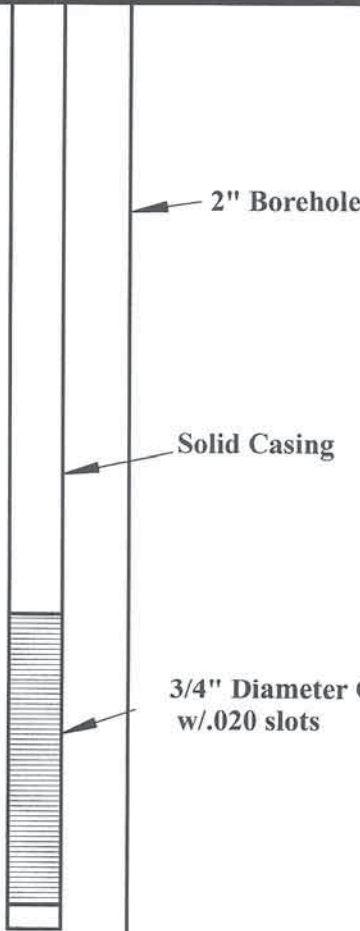

See Attached Site Map

Project No. 6468
 Logged By: BK
 Drilling Method: Push Probe
 Sample Method: continuous
 Casing Type: Sch 40 PVC
 Slot Size: 0.020"

Client: R.B. Pamplin
 Date: 6/24/24
 Location: Portland, OR
 Hole Diameter: 2 inch
 Well Diameter: 3/4 inch

*K & S
 Environmental, Inc.*

Boring B-12

Well/Boring Completion		Depth in Feet	Sample	Graphic	Sample #	Lithology/Remarks
 <p>2" Borehole</p> <p>Solid Casing</p> <p>3/4" Diameter Casing w/.020 slots</p>		<p>3</p> <p>6</p> <p>9</p> <p>12</p> <p>15</p> <p>18</p> <p>21</p> <p>24</p> <p>27</p> <p>30</p> <p>33</p> <p>36</p> <p>39</p> <p>42</p>			<p>▼ GT20</p>	<p>Interbedded sand/silt 0-15' gray</p> <p>Gray Silty Clay w/no odor 15-26 ft.</p> <p>Brown silty clay 26-30 ft. no odor - water at 24.9 ft.</p>

Location Map

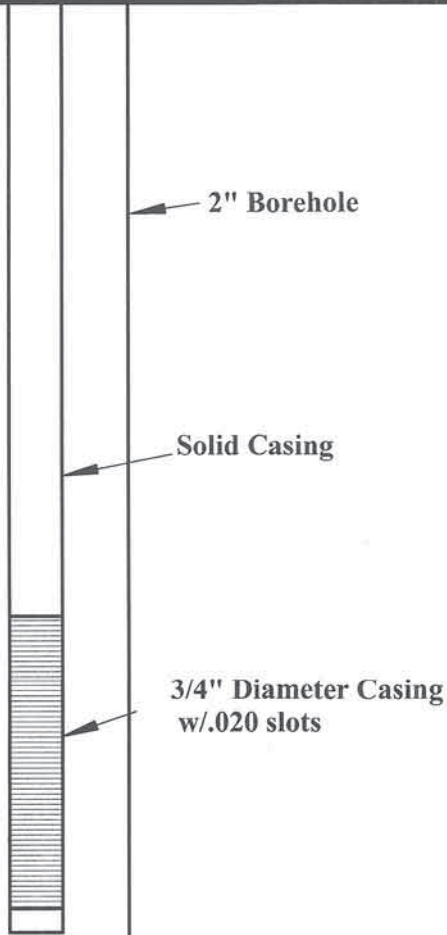

See Attached Site Map

Project No. 6468
 Logged By: BK
 Drilling Method: Push Probe
 Sample Method: continuous
 Casing Type: Sch 40 PVC
 Slot Size: 0.020"

Client: R.B. Pamplin
 Date: 6/24/24
 Location: Portland, OR
 Hole Diameter: 2 inch
 Well Diameter: 3/4 inch

*K & S
 Environmental, Inc.*

Boring B-13

Well/Boring Completion		Depth in Feet	Sample	Graphic	Sample #	Lithology/Remarks
 <p>2" Borehole</p> <p>Solid Casing</p> <p>3/4" Diameter Casing w/.020 slots</p>		<p>3</p> <p>6</p> <p>9</p> <p>12</p> <p>15</p> <p>18</p> <p>21</p> <p>24</p> <p>27</p> <p>30</p> <p>33</p> <p>36</p> <p>39</p> <p>42</p>			<p>▼ GT21</p>	<p>Interbedded sand/silt 0-15' gray</p> <p>Gray Silty Clay w/no odor 15-30 ft.</p> <p>no odor - water at 24.9 ft.</p>

Location Map

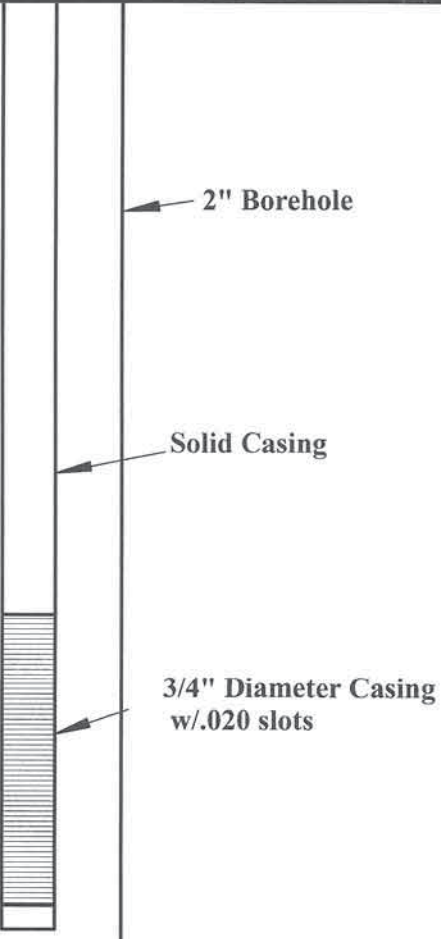

See Attached Site Map

Project No. 6468
 Logged By: BK
 Drilling Method: Push Probe
 Sample Method: continuous
 Casing Type: Sch 40 PVC
 Slot Size: 0.020"

Client: R.B. Pamplin
 Date: 6/24/24
 Location: Portland, OR
 Hole Diameter: 2 inch
 Well Diameter: 3/4 inch

*K & S
 Environmental, Inc.*

Boring B-14

Well/Boring Completion		Depth in Feet	Sample	Graphic	Sample #	Lithology/Remarks
 <p>2" Borehole</p> <p>Solid Casing</p> <p>3/4" Diameter Casing w/.020 slots</p>		<p>3</p> <p>6</p> <p>9</p> <p>12</p> <p>15</p> <p>18</p> <p>21</p> <p>24</p> <p>27</p> <p>30</p> <p>33</p> <p>36</p> <p>39</p> <p>42</p>			<p>▼ GT22</p>	<p>Interbedded silty clay & wood debris 0-12' gray w/no odor</p> <p>Gray Silty Clay w/no odor 12-30 ft.</p> <p>no odor - water at 24.7 ft.</p>

Michael Bernert

From: DANA Kevin * DEQ <kevin.dana@deq.oregon.gov>
Sent: Wednesday, September 25, 2024 7:53 AM
To: Michael Bernert
Cc: Barbara R. Miletich; Randy Steed; ksenvironmental@yahoo.com; davidb@peakenvironmentalllc.com; DANA Kevin * DEQ
Subject: RE: KF Jacobson (LUST 26-98-1133)

Good Morning Michael,

Thank you for the update on the project status. It's good to hear that you had a productive meeting with Ross Island and that the project is moving forward.

Feel free to offer up some potential meeting times and dates when you're ready. Tuesday mornings and Fridays tend not to be good times for myself and others in DEQ's Cleanup group, but most other times can work. You're also free to just submit a proposed workplan if you settle on one particular path forward.

Looking forward to working with you to get this project wrapped up.



Kevin Dana
Cleanup Project Manager
Oregon DEQ | Northwest Region Office
700 NE Multnomah Street, Suite 600
Portland, OR 97232-4100
503-229-5369
Kevin.Dana@deq.oregon.gov

From: Michael Bernert <michael@wilsonvilleconcrete.com>
Sent: Tuesday, September 24, 2024 3:04 PM
To: DANA Kevin * DEQ <kevin.dana@deq.oregon.gov>
Cc: Barbara R. Miletich <Barbara.Miletich@themeigroup.com>; Randy Steed <randysteed@ridredge.com>; ksenvironmental@yahoo.com; davidb@peakenvironmentalllc.com
Subject: KF Jacobson (LUST 26-98-1133)

You don't often get email from michael@wilsonvilleconcrete.com. [Learn why this is important](#)

Hi Kevin,

Thank you for the note below that you sent to Barbara. She has been out of the office and I following up on her behalf. I wanted to provide a bit more context on the work that has been occurring in the last month and what we see as resolution paths for LUST 26-98-1133.

First, I wanted to clarify that "Albina Gateway, LLC" is the current property owner and would have to be the party on the easement. Myself and the owners of the MEI Group are the members of Albina Gateway and Barbara has been kind enough to help us coordinate this matter. Having Albina Gateway sign the easement is complicated for us because Ross Island and the legacy Pamplin entities have a contractual obligation to resolve any pre-existing contamination on the site. Albina Gateway is hesitant to sign the easement because it could transfer future clean-up obligations from the Ross Island/Pamplin entities to Albina Gateway.

We had a productive meeting with Ross Island on September 11th regarding possible strategies to proceed without abrogating the Pamplin/Ross Island obligations to Albina Gateway. Our team came up with many productive ideas

that we are still working through. In the meantime, we are evaluating the cost and methods of some in-situ soil remediation and expect to have some ideas on what might be possible in that regard in the coming days.

We hope to wrap up an action plan that we can share with you soon. In the meantime, would you be open to having a call with the Albina team and our environmental consultant David Boyris to review our conceptual ideas on remediation should we choose to take this path? Perhaps a time during the second week of October would work for you as we need another week or two to finish running to ground the options between Albina & Pamplin/Ross Island.

Thank you again for your help and patience with this matter.

Kind Regards,

Michael

***** Note from Kevin Dana to Barbara Miletich *****

From: DANA Kevin * DEQ <kevin.dana@deq.oregon.gov>
Date: September 23, 2024 at 7:48:16 AM PDT
To: "Barbara R. Miletich" <Barbara.Miletich@themeigroup.com>
Cc: DANA Kevin * DEQ <kevin.dana@deq.oregon.gov>, K&S Environmental <ksenvironmental@yahoo.com>, Randy Steed <randysteed@ridredge.com>
Subject: RE: K.F. Jacobsen (LUST 26-98-1133)

Good Morning Barbara,

I'm following up on my email from last month regarding a pocket of contaminated soils at the K.F. Jacobsen site on North River Street in Portland.

Has MEI Group made a decision about recording an Easement on the property? I haven't heard anything at my end.



Kevin Dana
Cleanup Project Manager
Oregon DEQ | Northwest Region Office
700 NE Multnomah Street, Suite 600
Portland, OR 97232-4100
503-229-5369
Kevin.Dana@deq.oregon.gov

From: Barbara R. Miletich <Barbara.Miletich@themeigroup.com>
Sent: Friday, August 16, 2024 10:16 AM
To: DANA Kevin * DEQ <Kevin.DANA@deq.oregon.gov>
Subject: RE: K.F. Jacobsen (LUST 26-98-1133)

Thank you for the update Kevin. We are looking into a response to Ross Island from our end.

Barbara Miletich
Assistant to the CEO

Moore Excavation, Inc.
Mei Group

PO Box 789
5501 NE 223rd St
Fairview, OR 97024
Tel: 503-674-0900
Fax: 503-386-2460
Cell: 503-849-5801



From: DANA Kevin * DEQ <Kevin.DANA@deq.oregon.gov>
Sent: Wednesday, August 14, 2024 2:37 PM
To: K&S Environmental <ksevenvironmental@yahoo.com>; Randy Steed <randysteed@ridredge.com>
Cc: DANA Kevin * DEQ <Kevin.DANA@deq.oregon.gov>; Barbara R. Miletich <Barbara.Miletich@themeigroup.com>
Subject: K.F. Jacobsen (LUST 26-98-1133)

Bill & Randy,

DEQ has completed its review of available file information for the K.F. Jacobsen & Company site at 1208 North River Street in Portland, including three (3) Subsurface Investigation Reports.

Of note, diesel concentrations in downgradient groundwater samples (which range from 274 to 527 parts per billion) are similar to diesel concentrations in upgradient groundwater samples (232 to 416 ppb). This suggests that the downgradient groundwater contamination is the result of a larger, area-wide contaminant plume and not the result of releases from the site.

Unfortunately, there is an issue with soil contamination at the site. Diesel was detected in boring B-4 at 10 feet below ground surface at a concentration of 13,300 parts per million, and total petroleum hydrocarbons (diesel and oil) were detected in boring B-7 at 10 feet bgs at 12,990 ppm. The concentrations exceed DEQ's risk-based concentration of 4,600 ppm diesel for direct contact by construction workers.

The pocket of soil contamination that apparently extends from boring B-4 to boring B-7 needs to be addressed. It can be left in-place for now, as construction work is unlikely to occur 10 feet beneath the equipment currently in the area, but the existence of the contamination will need to be memorialized.

DEQ understands that MEI Group currently owns the site. As the property owner, MEI Group could agree to record an Easement & Equitable Servitudes (EES) on the property requiring that the pocket of contaminated soils be addressed if and when it ever becomes accessible. Once the EES is recorded, DEQ could then issue a No Further Action (NFA) letter for the site. If MEI doesn't agree to an EES, then we may need to look into non-intrusive ways to reduce the soil contaminant concentrations to around 4,600 ppm.

Let me know how you want to proceed. There is only one (relatively small) pathway of concern that needs to be addressed at this site, so hopefully we're almost there.

<image002.png> **Kevin Dana**
Cleanup Project Manager