



# Oregon

Kate Brown, Governor

Department of Environmental Quality

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April 7, 2016

Trevor Rowe  
RiverPlace Hotel Investors, LLC  
1308 NW Everett Street  
Portland, OR 97209

RE: South Waterfront Riverplace Lot 8  
Project Completion Report  
DEQ ECSI No. 4424

Dear Mr. Rowe:

The Oregon Department of Environmental Quality (DEQ) has reviewed the *Project Completion Report*, dated January 12, 2016, for RiverPlace Block 8 in Portland, Oregon, prepared by Apex on behalf of RiverPlace Hotel Investors, LLC. The site is the real property located on the northeast corner of the intersection of SW River Drive and SW River Parkway, and designated in DEQ's Environmental Cleanup Site Information (ECSI) database as No. 4424. The site is also known as Lot 8 within partitioned Parcel 3 (and later split as sub-parcel 3B) from the South Waterfront Redevelopment Area site (ECSI No. 602).

In 1998 DEQ issued a *Record of Decision Selected Remedial Action - Parcel 3* consisting of restrictions on groundwater use and requirements for removal of asbestos-containing material (ACM) within Parcel 3B. In 2006, a cleanup action was undertaken and the bulk of the ACM was removed, excepting an estimated 200 tons of this material under the street along the eastern boundary of the Lot 8 site. The remaining ACM debris is capped by pavement and demarcated with geotextile fabric. DEQ issued an updated Conditional No Further Action determination for the site in 2007 subject to institutional controls, including maintaining capped areas and notification to DEQ in advance of disturbance. A further condition was that in the case of site redevelopment, plans would be provided to DEQ ensuring that redevelopment activities would not exacerbate conditions. Site restrictions are institutionalized in a 2007 Easement and Equitable Servitudes (EES) recorded with Multnomah County.

The Completion Report summarizes earth-disturbing activities that occurred during site redevelopment and related protective measures performed at the subject property in accordance with the DEQ-approved *Contaminated Media Management Plan*, dated August 2014, and the June 2014 *General Plan for Management of Asbestos-Contaminated Concrete Debris* for the South Waterfront Redevelopment Area, Parcel 3. The area of buried ACM was disturbed during site redevelopment and the above-referenced plans were adhere to, including air monitoring for

potential asbestos airborne during excavation work. No ACM material was visually observed or confirmed by air monitoring.

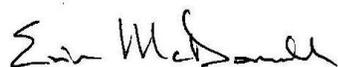
In addition to properly implementing contaminated media management plans, RiverPlace Hotel Investors, LLC, elected to install a vapor collection system beneath the site building to mitigate methane gas detected in the subsurface at low to moderate levels, presumably attributable to wood waste present in the subsurface. While engineering controls were not required, DEQ recommended adequate measures to address any unacceptable risk posed by the presence of methane gas. The combination of the vapor barrier and passive collection system installed is an appropriate protective measure.

In regards to the 2007 EES, DEQ recommends executing an updated version to reflect post-redevelopment conditions and clarification on expected ongoing requirements of the owner related to environmental contamination contained but present on the property.

In conclusion, DEQ has determined that work performed at the site as described in the Project Completion Report complies with conditions of the conditional NFA previously issued by DEQ. Given that buried ACM waste remains in the subsurface, the site continues to be subject to institutional controls including the following: maintenance of a clean cap (soil and/or hardscape) over the ACM material, notification to DEQ should disturbance of the ACM material occur; and a prohibition on site groundwater use unless prior approval is granted by DEQ.

Please feel free to call me at (503)229-6900 if you should have any questions regarding the project or information presented in this letter.

Sincerely,



Erin K. McDonnell, P.E.  
Project Manager  
Northwest Region Cleanup Program

cc: Kevin Parrett, DEQ  
Dan Hafley, DEQ  
Adam Reese, Apex