

Revised Source Control Evaluation Work Plan

Various Tax Lots – Tindall Family Properties, Inc.

Near 9233 NW Cast (ECSI No. 999)

Portland, Oregon 97217

ACC Project Number: 10366-001.00

Prepared for:

Mr. Jason Tindall

Blue Line Transportation

2601 N. Newark Street

Portland, Oregon

January 28, 2026

Prepared by:



An Employee Owned Company

ACC Environmental Consultants, Inc.

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1.0 INTRODUCTION

ACC Environmental Consultants, Inc. (ACC) has been contracted by Tindall Family Properties, Inc. (Client) to prepare a work plan for performing additional Source Control Evaluation (SCE) at multiple properties that are located in close proximity to the Columbia Slough in North Portland (Figure 1).

The purpose of the evaluation activities are to confirm that the properties are not a source of unacceptable concentrations of polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), and metals that have been observed in stormwater from nearby catch basins (see Section 3). If the properties are identified as a source, appropriate source control measures (SCMs) will be implemented. Such SCMs (if required) would be proposed to DEQ under separate cover.

Only a portion of those properties are considered Properties of Interest that discharge stormwater to the City of Portland Basin 60 outfall. Collectively, the Properties of Interest are considered the Facility (Figures 2 and 3). Roughly 37% of the approximate 9.5-acre area owned by the Client is within the stormwater basin that drains to the City of Portland Outfall 60.

The proposed scope of work (SOW) is intended to assist in SCE activities requested by Oregon Department of Environmental Quality (DEQ) and is based on the following documents and correspondence:

- A DEQ letter to the Client (*Notification of Potential Ongoing Contaminant Sources*), dated July 22, 2024;
- A September 10, 2024 on-site meeting with DEQ, the Client, and ACC representatives.
- ACC’s *Source Control Evaluation Background Review*, dated October 31, 2024;
- DEQ’s comment letter, dated December 17, 2024;
- ACC’s *Updated SCE Background Review*, dated September 17, 2025 (*SCE Background Review*; Appendix A);
- DEQ’s comment letter and request for an SCE Work Plan, dated August 13, 2025; and
- DEQ’s comment letter on the SCE Work Plan, dated December 2, 2025.

2.0 FACILITY DESCRIPTION

Facility description. The Facility is located in Portland, Oregon and immediately south of the Lower Columbia Slough and north of Columbia Boulevard. Groundwater at the Facility has been observed at depths of roughly 25 to 35 feet below ground surface (bgs). While the Tindall Family owns several properties in the area, only select Properties of Interest (collectively known as the Facility) fall within the drainage basin of Outfall 60 (ie., Basin 60). These include the following addresses/taxlots:

Address	Tax Lot ID Prefix	Tax Lot ID Suffix
9243 W/N Burrage Ave	1N1E09BA	1700

9243 W/N Burrage Ave	1N1E09BA	2000
9243 W/N Burrage Ave	1N1E09BA	2100
SEC/ Newark & N Peninsular Ave	1N1E09BA	400
N Columbia Blvd	1N1E09BA	900
2606 N Newark St.	1N1E09BA	2200
2606 N Newark St.	1N1E09BA	2300
9130 N Burrage Ave	1N1E09BA	2400
9130 N Burrage Ave	1N1E09BA	2500
9127 N Wilbur Ave	1N1E09BA	2800
9127 N Wilbur Ave	1N1E09BA	2900

Facility Activities and Uses. The Facility is currently used by Blue Line Transportation who manufactures, stores, and transports asphalt emulsions for road construction, transports gasoline, diesel, and aviation fuel, provides repair services to trucks and tanks, as well as the storage and transport of lignosulfonate and magnesium chloride for road dust control and anti-icer. Manufacturing and storage of the products is conducted in areas that are outside of the Facility. Stormwater that is generated in those manufacturing and storage areas is pumped to the municipal combined sewer system via private gravity main lines that connect to the combined sewer system. The area within the Facility is predominately used for truck, tanker, and trailer parking. Additionally, a portion of a concrete weigh station is within the Facility. Site features are shown on Figure 3. Surface conditions at the Facility are shown on Figure 4. Current and historical Facility usage and onsite materials are discussed in greater detail in the attached *SCE Background Review*.

3.0 SCE BACKGROUND

In July 2024, DEQ requested completion of a SCE at the Facility after stormwater samples (60-SW6 and 60-SW7) collected by the City of Portland (City) from the city underground conveyance system (Figure 3) showed elevated levels of polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), and metals¹. The samples were collected from stormwater catch basins along the conveyance line to Outfall 60, where sediment contaminant levels have been detected above DEQ-established baseline concentrations for the lower Columbia Slough. Maximum pollutant concentrations were found in stormwater samples from October 16, 2023, when PCB concentrations were detected at concentrations ranging from 629,000 picograms per liter (ppq) to 966,000 ppq in catch basins south of the Facility². Additionally, DEQ requested that mercury be included in the SCE as elevated concentrations were observed in a stormwater sediment sample collected by the City in January 2025.

¹ City of Portland, 2024. *Source Tracing Investigation and Basin Characterization: 2022-2023, Evaluation of City Stormwater Outfall Basins Discharging to the Columbia Slough*. May 2024.

² City of Portland, 2024. *Source Tracing Investigation and Basin Characterization: 2022-2023, Evaluation of City Stormwater Outfall Basins Discharging to the Columbia Slough*. May 2024.

It should be noted that fluorescent light bulbs that had been illegally dumped near a Basin 60 catch basin had been observed concurrently.

Potential contaminant sources. Based on the attached *SCE Background Review*, the following *potential* contaminant sources were identified at the Facility:

- Illegal dumping. Illegal dumping of fluorescent light bulbs, car parts, tires, brake pads, and other materials have been documented at and near the Facility (including adjacent to the catch basins) by DEQ and others. The dumping are a likely source of mercury, PCBs, PAHs, and other contaminants. Therefore, we consider illegal dumping a potential source.
- Off-site sources. Basin 60 also drains significant portions of North Columbia Boulevard and railroad thoroughfares. It is very likely that the highway and other off-site areas are a source of metals, PCBs, PAHs, and other contaminants from brake dust, fuel and oil drippage, and similar sources. Therefore, we consider the North Columbia Boulevard a potential source.
- Catch Basin and Conveyance System. We understand that system cleaning is a responsibility of the City of Portland. If the system has not been emptied and cleaned of sediment since before remedial activities, it is possible that they still contain sediment from historical runoff. In addition to the Facility, the system receives stormwater and sediment from multiple other sites outside of the Facility. It is possible that these other sources may have contributed contaminants to the conveyance system. Therefore, we consider these other sites potential sources.
- Truck storage and maintenance. While no significant releases or spills of petroleum hydrocarbons have occurred at the Facility, given the on-site truck fueling, storage, and maintenance activities, it is possible that drippage or spillage of petroleum hydrocarbons could impact surface soil and/or stormwater which could then be conveyed to the stormwater collection system. Therefore, the potential conveyance of sediment impacted by petroleum spillage/drippage from truck operations is considered a potential source of hydrocarbons, PAHs, VOCs and/or heavy metals.
- Taxlot 1N1E09BA 900. While the NW Cast site has historically included elevated PCBs and metals in surface soil, the soil has been removed from the Site and clean gravel used for backfill. It should be noted that remedial excavation and backfilling did not occur in this (taxlot 900) small triangular area adjacent to the most southwestern corner of the NW Cast site. Excavation was not extended to this area based on field screening of soil that was conducted during the excavation operations. Additionally, the area could have been affected by dust and stormwater from the former NW Cast site. Therefore, we consider taxlot 1N1E09BA 900 a potential source.

4.0 REVIEW OF CITY SEWER RECORDS

In an effort to understand historical and existing conditions within the City's stormwater conveyance system, including if the conveyance line has ever been cleaned, ACC reviewed available City records. Findings are below.

- The historical City stormwater samples (60-SW6 from ANB983 and 60-SW7 from ANB982) appear to have been collected from the main stormwater conveyance line which (according to City records) was cleaned in July 2023 and approximately three months after the line cleaning. The main stormwater conveyance line receives stormwater from a parallel french drain located just north of the main line that includes multiple catch basins (ANB987, ANB988, ANB989, ANB990, ANB991).

- ACC discovered the following records related to stormwater conveyance line cleaning on PortlandMaps.com (https://www.portlandmaps.com/detail/sewer/ANB980/406321_did/).
 - ANB980 to ANB981. Records from July 10 and July 31, 2023 (Work Orders 654596 and 654412) show that this section of concrete stormwater sewer line, installed in May 1990, was cleaned and subsequently video inspected. Rock and sand were reportedly removed. The City noted that the pipe was in fair condition. They also noted a 2-foot longitudinal crack from 38 to 40-feet upgradient of ANB981.
 - ANB981 to ANN253. City records show that this section was cleaned on July 10, 2023 and subsequently camera inspected (Work Orders 654597 and 654413). The pipe was reported to be in fair condition with one small (<1 foot) longitudinal crack at 44-feet upgradient from ANN253.
 - ANN253 to ANB982. City records show that this section was cleaned on July 10, 2023 and subsequently camera inspected (Work Orders 65462 and 654429). The pipe was reported to be in fair condition with no cracks noted.
 - ANB982 to ANN256. City records show that this section was most recently cleaned on July 10, 2023 and subsequently camera inspected (Work Orders 654598 and 654414). The pipe was reported to be in fair condition with no cracks noted.
 - ANN256 to ANB983. City records show that this section was most recently cleaned on July 10, 2023 and subsequently camera inspected (Work Orders 654598 and 654414). The pipe was reported to be in fair condition with no cracks noted.

5.0 PROPOSED SCE ACTIVITIES

A discussion of the proposed Site activities is below.

5.1 *Pre-Field Investigation Activities*

Permits. ACC will work with the City of Portland to facilitate the cleaning of the City's stormwater conveyance line (see Section 3.2 below). If the City is not willing to clean the line, ACC/Blue Line will conduct the cleaning independently, but with approval from the City.

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.

Underground Utility Locates. Prior to the commencement of subsurface activities, a public utility notification will be requested through the Oregon One Call service.

5.2 *Field Activities*

The proposed field activities are discussed below. Standard Operating Procedures (SOPs) describing sampling methodology are included in Appendix B. Field forms are included in Appendix C.

Upland ISM soil sampling. Tax lots within the Facility that contain exposed, bare soil will be sampled in order to characterize near surface soil that could potentially affect stormwater conditions. It should be noted that the majority of the Facility is asphalt- or concrete-paved and taxlots within the Facility that include areas of exposed surface soil are primarily limited to taxlots 400 and 900.

These areas will be inspected and if exposed soil is present, ACC will collect a near-surface sample using incremental soil sampling (ISM) methodology. ISM samples will consist of one decision unit (DU) per taxlot. The proposed ISM sample locations are shown on Figure 4. In general, the DUs will consist of a minimum of 30 discrete increments extending from the surface to approximately 6-inches below ground surface (bgs). If surface vegetation or gravel is present, the material will be removed from the area before sampling. ISM sampling procedures are included in the attached SOP. Note, ISM sampling at taxlot 400 will incorporate side-slope sampling along the western taxlot boundary. Samples will be collected using clean, decontaminated hand tools (e.g., shovel, hand trowel, auger, etc.) and ACC will attempt to avoid sampling any surface vegetation, gravel, and/or broken pavement. The samples field screened by visual/olfactory observation, sheen testing, and use of a photo-ionization detector (PID) before being transferred to laboratory-provided sample jars. The ISM samples will be placed into a cooler with ice before being transferred to Apex Laboratories of Tigard, Oregon for chemical analysis. Proposed sample locations are shown on the attached Figure 2. Actual locations may vary based on field conditions.

should be Figure 4

ACC will maintain a sample log for each location detailing the lithology, field screening results, and sample depths. Sampling tools will be decontaminated between boring locations using an Alconox® and water mixture and rinsed with clean water.

Catch basin sediment sampling. ACC will collect a representative sediment sample from the off-Facility catch basin located immediately west of taxlot 900. Prior to sampling, ACC will be required to obtain access with the property owner (Florence & Lee, LLC, 1800 SW 1st Avenue, #220, Portland, OR 97201). The catch basin is not shown on the City of Portland's Sewer Asset database (<https://www.arcgis.com/apps/Viewer/index.html?appid=60bbdb13e97849f898713304dd20b9ad>) but it is assumed that the catch basin connects to the city system. The sediment sample will be collected by hand auger or equivalent methodology. Sampling tools will be decontaminated before sampling using an Alconox® and water mixture and rinsed with clean water. The sediment will be placed into laboratory-provided jars and into a cooler with ice before being transferred to the lab. The sample will be submitted to Apex Laboratories for chemical and grain size analysis.

Catch basin stormwater sampling. ACC will one representative stormwater sample from the off-Facility catch basin located immediately west of taxlot 900. Prior to sampling, ACC will be required to obtain access with the property owner (Florence & Lee, LLC, 1800 SW 1st Avenue, #220, Portland, OR 97201).

Stormwater sampling will be conducted consistent with DEQs Guidance for *Evaluating the Stormwater Pathway at Upland Sites*, dated January 2009 (updated October 2010) and consider criteria including, but not limited to, rainfall event threshold, antecedent dry period, and the timing of sample collection. ACC will maintain a log for each sample detailing the location, lithology, and field screening results. Sampling tools will be decontaminated between locations using an Alconox® and water mixture and rinsed with clean water.

5.3 Analytical Program

Soil, sediment, and stormwater samples that are collected will be submitted under chain-of-custody to Apex Laboratories of Tigard, Oregon for chemical analysis. The analytical program presented below is based on contaminants of interest (COIs) previously identified in the attached *Upland SCE Background Review*, dated September 17, 2025 (Appendix A). ACC will verify that the proper analytical methods use Method Reporting Limits (MRLs) low enough to screen results against the relevant screening level values.

ISM and sediment samples. ISM and sediment samples will be analyzed for the following COIs:

- Total petroleum hydrocarbons as gasoline (TPH-g) by Northwest Method NWTPH-Gx;
- Total petroleum hydrocarbons as diesel and oil (TPH-d/o) by Northwest Method NWTPH-Dx;
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX) by EPA Method 8260;
- Polychlorinated biphenyls (PCBs) by EPA Method 8082;
- Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270-SIM; and
- Total metals (antimony, arsenic, cadmium, chromium, copper, lead, mercury, nickel, and zinc) by EPA Method 6010/6020/200.8.

Stormwater sample. The catch basin stormwater sample will be analyzed for the following:

- TPH-g by Northwest Method NWTPH-Gx;
- TPH-d/o by Northwest Method NWTPH-Dx;
- BTEX by EPA Method 8260;
- PCBs by EPA Method 8082;
- PAHs by EPA Method 8270-SIM;
- Dissolved metals (antimony, arsenic, cadmium, chromium, copper, lead, mercury, nickel, and zinc) by EPA Method 6010/6020/200.8; and
- Total suspended solids (TSS).

Analytical results will be compared to relevant DEQ risk-based concentrations (RBCs), the Lower Columbia Slough screening level values, and the relevant non-Portland Harbor Stormwater screening level values. ACC will update DEQ with analytical results following each event.

CORRECT

5.4 Reporting

ACC will prepare an SCE Report describing field activities, laboratory results, risk screening, and conclusions. The report will include data tables, figures, and copies of laboratory reports. If appropriate, the report will include any recommendations for installing/implementing administrative and/or engineering controls and source control measures to reduce potential contaminants reaching the stormwater conveyance line. The report will be submitted to DEQ within 60 days of receipt of final analytical data reports. The report will be prepared in

draft and final form and will be provided to Blue Line Transportation for comment before being submitted to DEQ.

6.0 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 **Tindall Family Properties, LLC**. This report may not be used or relied upon by any other party without the written consent of **Tindall Family Properties, 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:

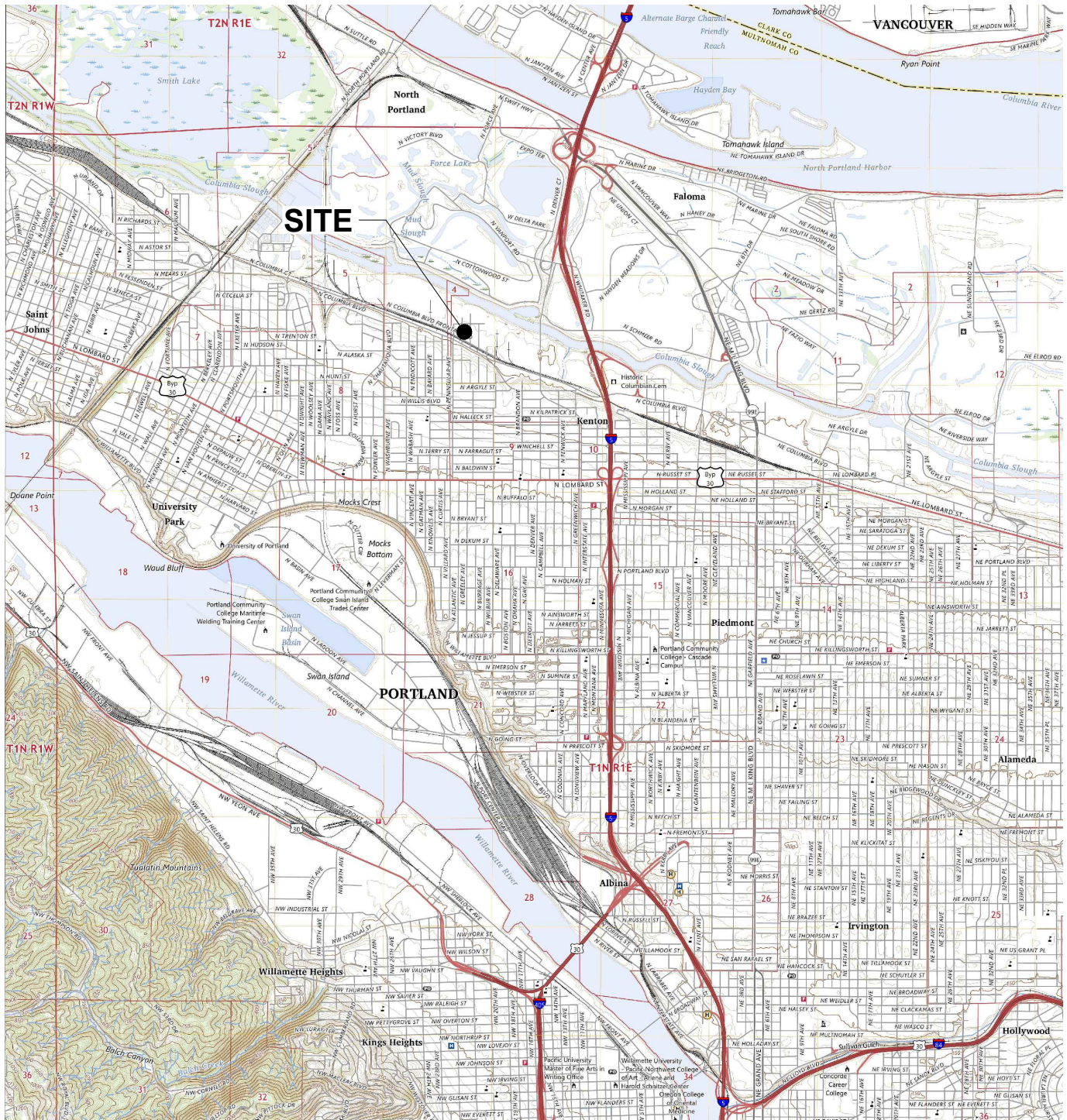
Prepared By:



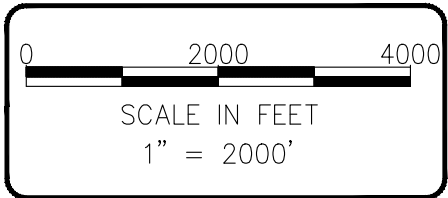
Christopher Sheridan, R.G.

PNW Subsurface Program Lead

FIGURES



NOTE(S):
 USGS, PORTLAND QUADRANGLE
 OREGON - WASHINGTON
 7.5 MINUTE SERIES (TOPOGRAPHIC)



DATE: 10-25-24
 DWN: SS
 CHK: CS
 APPROVED: CS
 PRJ. MGR: CS
 PROJECT NO:
 10366-001

FIGURE 1
 SITE LOCATION MAP
 BLUE LINE SCE
 Near 9233 NW CAST
 PORTLAND, OREGON

Address	Tax Lot ID Prefix	Tax Lot ID Suffix
(all in Portland, OR 97217)		
9243 W/N Burrage Ave	1N1E09BA	1700
9243 W/N Burrage Ave	1N1E09BA	2000
9243 W/N Burrage Ave	1N1E09BA	2100
SEC/ Newark & N Peninsular Ave	1N1E09BA	400
N Columbia Blvd	1N1E09BA	900
2606 N Newark St.	1N1E09BA	2200
2606 N Newark St.	1N1E09BA	2300
9130 N Burrage Ave	1N1E09BA	2400
9130 N Burrage Ave	1N1E09BA	2500
9127 N Wilbur Ave	1N1E09BA	2800
9127 N Wilbur Ave	1N1E09BA	2900

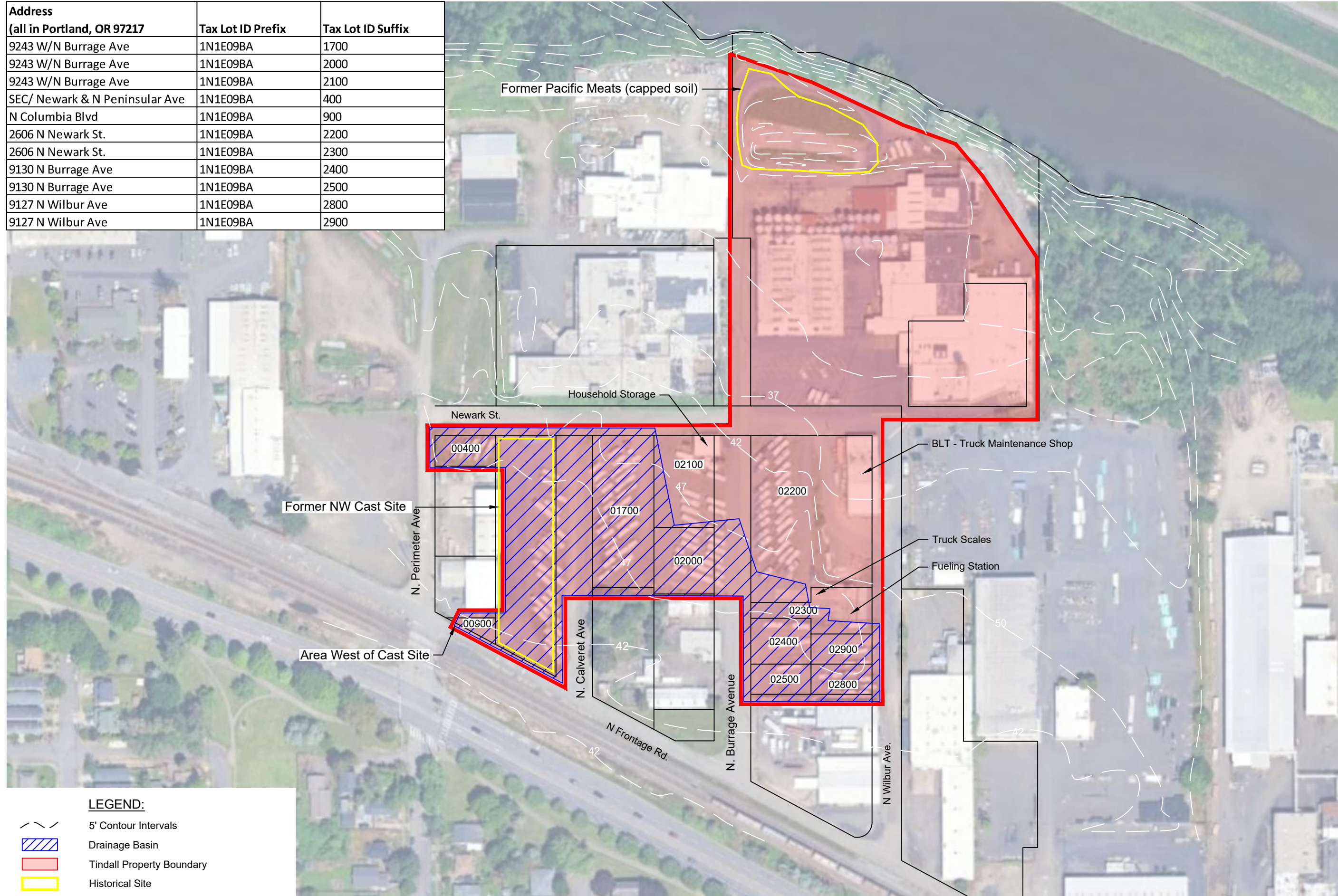
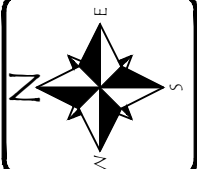
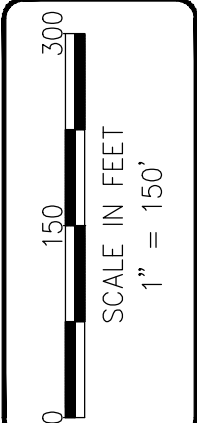


FIGURE 2
SITE OVERVIEW FACILITY MAP
BLUE LINE TRANSPORTATION
PORTLAND, OR.

DATE: 4-22-25
DWN: JJT
CHK: CS
APPROVED: CS
PRJ. MGR: CS
PROJECT NO: 10366-001.00



I:\Autocad Files\Hydrocon-Autocad\10366-001.00 Blue Line\2025\Mar 2025\10366-001.00_BM-032625.dwg

- LEGEND:**
- 5' Contour Intervals
 - Drainage Basin
 - Tindall Property Boundary
 - Historical Site

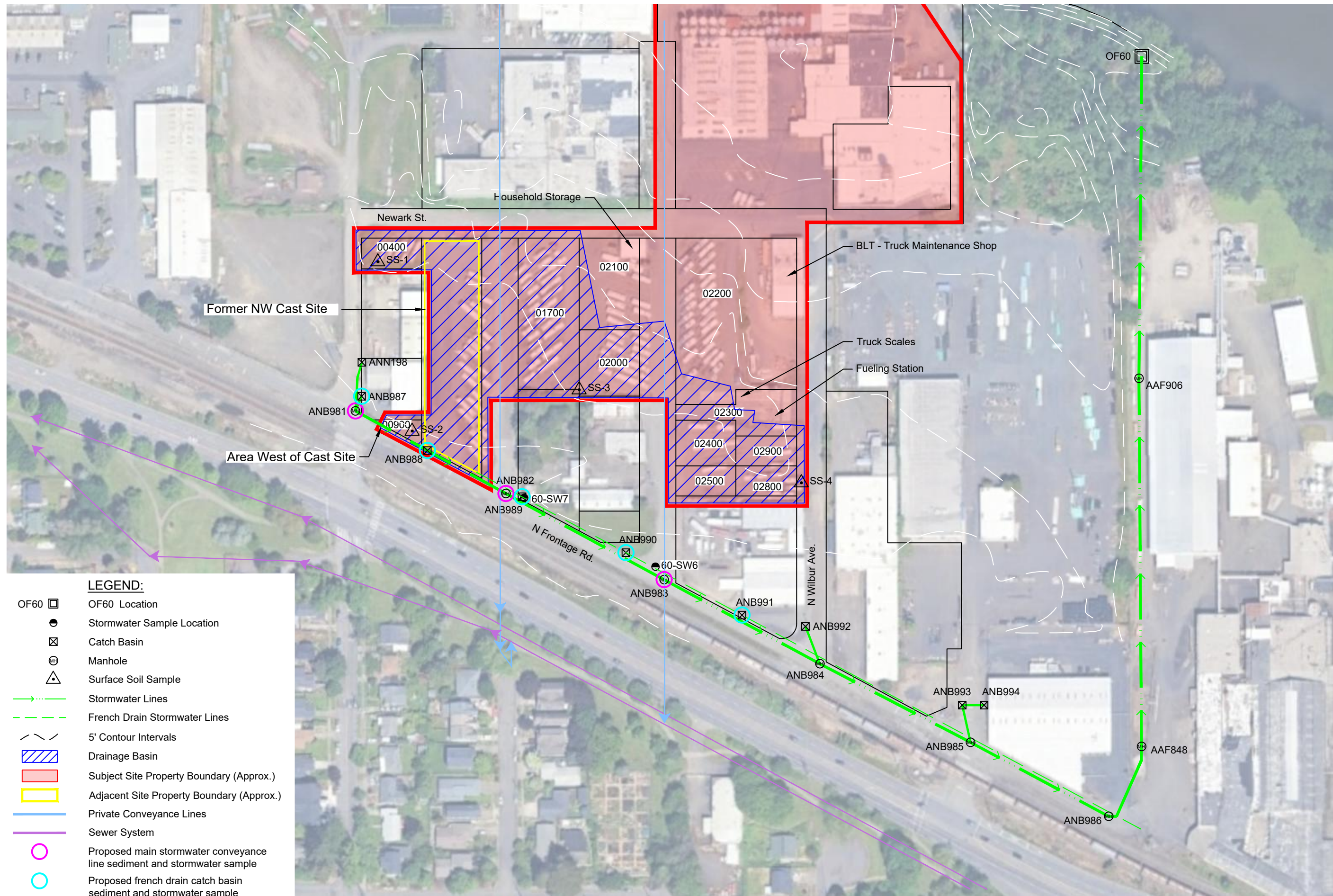
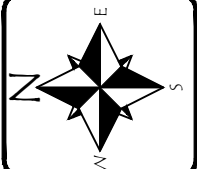
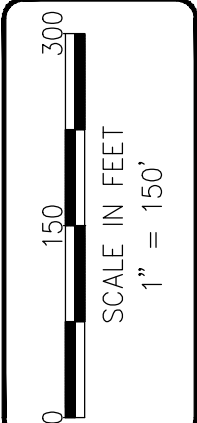
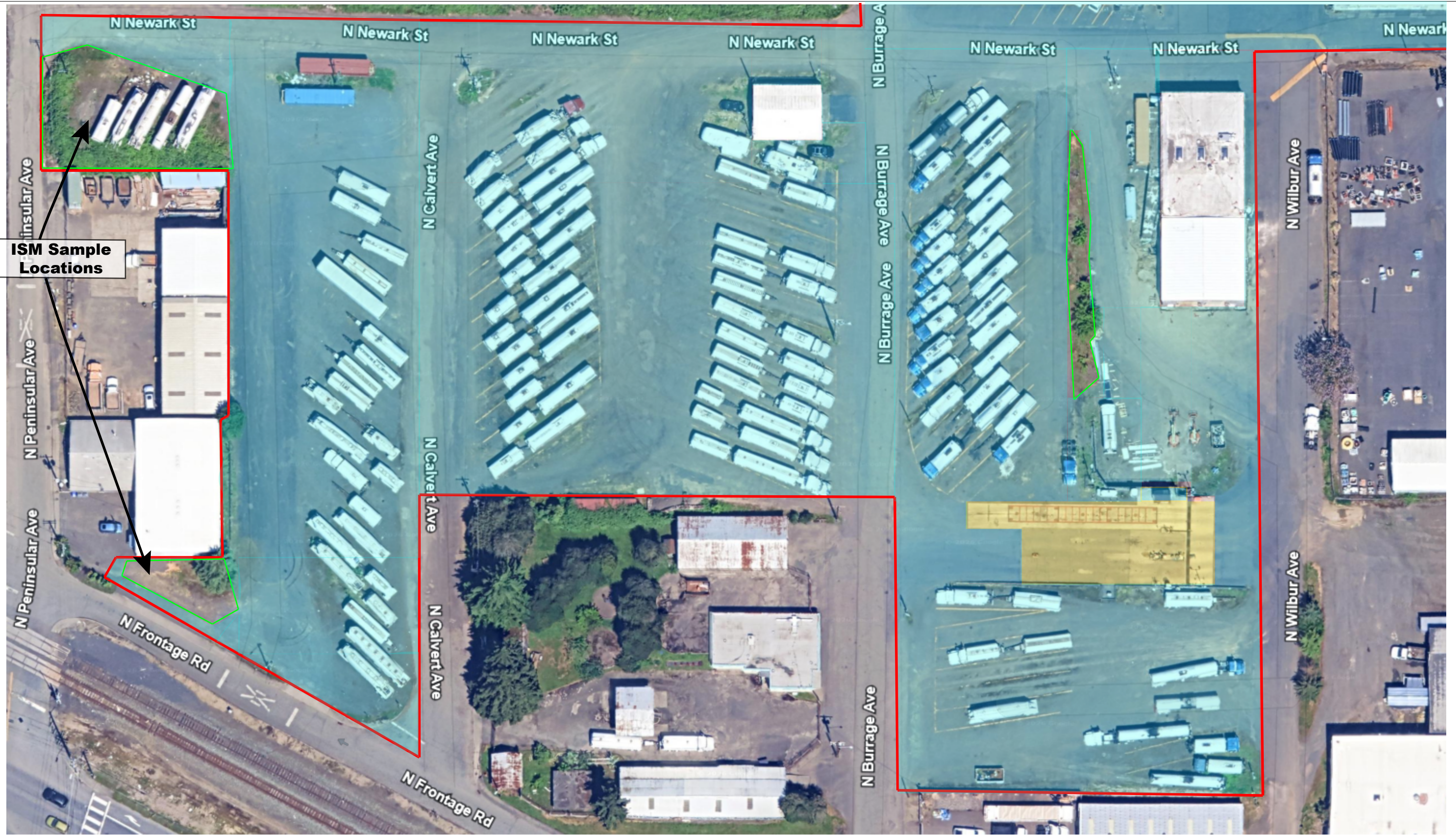


FIGURE 3
SITE FEATURES AND
PROPOSED SAMPLE LOCATIONS
BLUE LINE TRANSPORTATION
PORTLAND, OR.

DATE: 10-23-25
 DWN: JJT
 CHK: CS
 APPROVED: CS
 PRJ. MGR: CS
 PROJECT NO: 10366-001.00

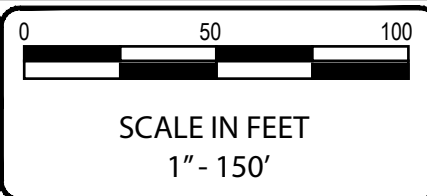
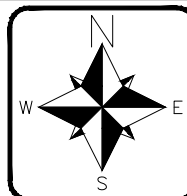


- LEGEND:**
- OF60 □ OF60 Location
 - Stormwater Sample Location
 - ⊠ Catch Basin
 - ⊙ Manhole
 - ▲ Surface Soil Sample
 - Stormwater Lines
 - - - French Drain Stormwater Lines
 - - - 5' Contour Intervals
 - ▨ Drainage Basin
 - ▭ Subject Site Property Boundary (Approx.)
 - ▭ Adjacent Site Property Boundary (Approx.)
 - Private Conveyance Lines
 - Sewer System
 - Proposed main stormwater conveyance line sediment and stormwater sample
 - Proposed french drain catch basin sediment and stormwater sample



Legend

- Approximate Boundary of Site
- Surface Soil
- Concrete
- Asphalt & Graded Asphalt Hardscape



A·C·C
ENVIRONMENTAL
CONSULTANTS

7977 Capwell Drive, Suite 100, Oakland, CA 94621
Phone: (510) 638-8400

DATE: 01/22/2026
DWN: RS
CHK: CS
APPROVED: CS
PRJ. MGR: MR
PROJECT NO:
10366-001.00

FIGURE 4
Site Surface Conditions & Proposed ISM Sample Locations
BLUE LINE TRANSPORTATION
PORTLAND, OREGON

APPENDIX A
UPDATED SCE BACKGROUND REVIEW, SEPTEMBER 17, 2025

TECHNICAL MEMORANDUM (REV. 3)

To: David Lamadrid, Oregon DEQ
From: Christopher Sheridan, R.G.
Date: September 17, 2025
Subject: Updated Source Control Evaluation Background Review
Various Tax Lots – Tindall Family Properties, Inc.
Near 9233 NW Cast (ECSI No. 999)
Portland, Oregon

ACC Environmental Consultants, LLC (ACC) has prepared this technical memorandum to present an updated source control evaluation (SCE) background review for several properties owned by the Tindall Family Properties, LLC (the Client). The Client owns multiple properties that are located in close proximity to the Columbia Slough in North Portland (Figures 1 through 3). Only a portion of those properties are considered Properties of Interest that discharge stormwater to the Basin 60 outfall. Collectively, the Properties of Interest are considered the Facility (Figure 2). Roughly 37% of the approximate 9.5-acre area owned by the Client is within the stormwater basin that drains to Outfall 60.

This Updated Background Review is intended to assist in SCE activities requested by Oregon Department of Environmental Quality (DEQ) in their letter dated July 22, 2024. This update addresses comments in a DEQ letter dated December 17, 2024. This letter is based on a review of available environmental records, discussions with the property owner, and DEQ and a site reconnaissance on September 10, 2024 with David Lamadrid (DEQ), Jason Tindall (Blue Line), Chris Sheridan (ACC) and Anna Martin (ACC) as well as follow-up site visits.

INTRODUCTION

In July 2024, DEQ requested completion of a SCE at the Facility after stormwater samples (60-SW6 and 60-SW7) collected by the City of Portland (City) from the underground City stormwater conveyance system showed elevated levels of polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), and metals¹. The samples were collected from stormwater catch basins along the conveyance line to Outfall 60, where sediment contaminant levels have been detected above DEQ-established baseline concentrations for the lower Columbia Slough. Maximum pollutant concentrations were found in stormwater samples from October 16, 2023, when PCB concentrations were detected at concentrations ranging from 629,000 picograms per liter (pg/l) to 966,000 pg/l in catch basins south of

¹ City of Portland, 2024. *Source Tracing Investigation and Basin Characterization: 2022-2023, Evaluation of City Stormwater Outfall Basins Discharging to the Columbia Slough*. May 2024.

the Facility². Additionally, DEQ requested that mercury be included in the SCE as elevated concentrations were observed in a stormwater sediment sample collected by the City in January 2025. It should be noted that fluorescent light bulbs that had been illegally dumped near a Basin 60 catch basin had been observed concurrently.

FACILITY DESCRIPTION

The Facility is located in Portland, Oregon and immediately south of the Lower Columbia Slough and north of Columbia Boulevard. Groundwater at the Facility (at 9209 and 9244 N. Calvert) has been observed at depths of roughly 25 to 35 feet below ground surface (bgs)³. While the Tindall Family owns several properties in the area, only select Properties of Interest (collectively known as the Facility) fall within the drainage basin of Outfall 60 (ie., Basin 60). These include the following addresses/taxlots:

Address	Tax Lot ID Prefix	Tax Lot ID Suffix
9243 W/N Burrage Ave	1N1E09BA	1700
9243 W/N Burrage Ave	1N1E09BA	2000
SEC/ Newark & N Peninsular Ave	1N1E09BA	400
N Columbia Blvd	1N1E09BA	900
2606 N Newark St. (<i>Western Half</i>)	1N1E09BA	2200
9130 N Burrage Ave	1N1E09BA	2400
9130 N Burrage Ave	1N1E09BA	2500
9127 N Wilbur Ave	1N1E09BA	2800
9127 N Wilbur Ave	1N1E09BA	2900

Areas that were described in DEQ's July 22, 2024 letter as within Basin 60 that have been since determined to be partially *outside* of Basin 60 include:

Address (all in Portland, OR 97217)	Tax Lot ID Prefix	Tax Lot ID Suffix
9243 W/N Burrage Ave	1N1E09BA	2100
2606 N Newark St. (<i>Eastern Half</i>)	1N1E09BA	2200
2606 N Newark St.	1N1E09BA	2300

² City of Portland, 2024. *Source Tracing Investigation and Basin Characterization: 2022-2023, Evaluation of City Stormwater Outfall Basins Discharging to the Columbia Slough*. May 2024.

³ Squier/Kleinfelder, 2005. *Phase II ESA, 9209 and 9233 N. Calvert Aven, Portland, OR*. 2005.

While these areas have portions determined to fall outside of Basin 60, we have included them in this background review as small areas of the lots drain to Basin 60.

Currently, Facility surfaces are primarily gravel or asphalt lots with some grass and landscaping. Surface elevation at the Facility ranges from approximately 40-feet above mean sea level (amsl) near the right of way (N Frontage Rd) to 49 feet amsl, 350-feet north near the center of tax lots 1700 and 2000. North of the center of the previously mentioned tax lots, the surface slopes downward towards the Columbia Slough. The Facility boundary, taxlots included in the SCE, and the City stormwater conveyance system are shown on **Figure 3**.

Due to the nature of the operations, and stormwater flow within the Facility, the Facility does not currently have a City of Portland Stormwater Pollution Control Plan or 1200-z NPDES permit.

HISTORICAL LAND USE REVIEW

ACC reviewed available historical Sanborn fire insurance maps and aerial photographs for the Facility. In general, the Facility included rural residential development as early as 1924 (the earliest maps reviewed). From 1969 through 1994, the residential development was removed and converted to truck storage yards. No land uses other than rural residential and truck storage were observed on the Facility during the map review. Maps and photographs are attached and discussed below.

<u>Year</u>	<u>Source</u>	<u>Findings</u>
1924	Sanborn map	The map shows minimal development on the Facility. Several dwellings are shown. The property south of current taxlot 2000 is shown as a Standard Company oil station with multiple steel oil tanks.
1936	Aerial photo	No significant changes to the Facility. A large, linear building/warehouse is present at the former NW Cast site. What may be a circular AST is present to the south of current taxlot 1700.
1948	Aerial photo	No significant changes to the Facility. What appear to be two circular ASTs (likely oil) are present to the south of current taxlot 1700.
1950	Sanborn map	The 1950 Sanborn map shows multiple dwelling structures of the Facility.

		A machinery contractor is present at the former NW Cast site west of the Facility. Further to the west, a 'dryer and glaze' facility is present. The property south of current taxlot 2000 remains an oil facility (Champion Oil).
1951-1960	Aerial photo	No significant changes to the Facility.
1969-1975	Sanborn map Aerial photos	The 1969 Sanborn map shows multiple dwelling structures of the Facility as well as a 'machinery and truck yard' on current taxlot 1700. The yard is visible on the 1970 aerial photograph where vegetation and a few residential structures have been cleared. The machinery contractor remains at the former NW Cast site west of the Facility and the property south of current taxlot 2000 remains an oil facility (Champion Oil).
1981	Aerial photo	Former residential structures and trees appear to have been cleared from the Facility, and trucks and/or tractor trailers are visible across the central portion of the Facility. The Facility appears unpaved. Taxlots 2400 and 2500 appear to remain rural residential.
1994-2000	Aerial photos	By 1994, taxlots 2400 and 2500 have been cleared of residential and vegetation and trucks are present. By 2000, taxlot 400 has been cleared of vegetation and is used for truck parking.
2006	Aerial photos	In 2006, a warehouse building that was present in the northern portion of the former NW Cast site is no longer present.
2017-2023	Aerial photos	In 2017, no trucks are visible at the former NW Cast site and the surface appears to be newly graded. By 2020, trucks are parked at the former NW Cast site.

FACILITY ACTIVITIES AND USES

The Facility is currently used by Blue Line Transportation who manufactures, stores, and transports asphalt emulsions for road construction, transports gasoline, diesel, and aviation fuel, provides repair services to trucks and tanks, as well as the storage and transport of lignosulfonate and magnesium chloride for road dust control and anti-icer. Manufacturing and storage of the products is conducted in areas that are outside of the Facility. Stormwater that is generated in those manufacturing and storage areas is pumped to the municipal combined sewer system via private gravity main lines that connect to the combined sewer system.

Portions of the Facility that drain to the Basin 60 outfall are primarily used for truck parking. De minimus amounts of hazardous substances and petroleum products that may be used or present within the Facility are associated with parked trucks and include:

- diesel fuel;
- gasoline fuel;
- 15/40 engine oil;
- transmission oil;
- gear oil;
- hydraulic fluid;
- grease;
- anti-freeze; and
- de minimus amounts of household cleaners.

Other areas nearby, but outside of Basin 60, include a truck scale and fueling area, household storage at a small building near Newark and Burrage Avenue, and truck maintenance in a warehouse shop at the corner of Newark and Wilbur Avenue (Figures 2 and 3). The fueling area includes three dispensers (two diesel pumps and one gasoline pump) and one 20,000-gallon underground storage tank (UST) containing diesel and one 4,000-gallon UST containing gasoline.

Taxlot uses and materials within the Facility are described in greater detail below.

- **1N1E09BA 400.** This tax lot has been used for truck parking with a grass and gravel surface since at least 2000. Between 1990 and 2000, the lot was developed as a gravel truck parking area from previously green foliage (bushes and trees) in 1990 based on aerial photograph review. Materials in this area are associated with truck and trailer storage and include temporary storage (associated with the trucks) of small amounts of diesel fuel, hydraulic oil, antifreeze, and gear oil. Based on our historical review, the first use was in 2000 when vegetation was cleared and truck storage is visible on the aerial photograph.
- **1N1E09BA 900.** This tax lot has been an undeveloped lot with an asphalt surface since 1990. Prior to that it was undeveloped and unpaved. Aerial imagery shows it is occasionally used for vehicle parking.
- **1N1E09BA 1700.** This tax lot has been used for truck and tanker trailer parking with a gravel surface since at least 1990. Prior to that it was used as rural residential from at least 1924 until approximately 1970, when it was cleared and subsequently used for truck parking. Materials in this area are associated with truck and trailer storage and include temporary storage

(associated with the trucks) of small amounts of diesel fuel, hydraulic oil, antifreeze, and gear oil.

- **1N1E09BA 2000.** This tax lot has been used for truck and tanker trailer parking with a gravel surface since at least 1990. Prior to that is was used as rural residential from at least 1924 until approximately 1970, when it was cleared and subsequently used for truck parking. Materials in this area are associated with truck and trailer storage and include temporary storage (associated with the trucks) of small amounts of diesel fuel, hydraulic oil, antifreeze, and gear oil.
- **1N1E09BA 2100 (southwest).** Only small areas within this tax lot are within the Facility (see Figures 2 and 3). This tax lot has been used for truck and tanker trailer parking since 1990. Prior to that is was used as rural residential from at least 1924 until approximately 1970, when it was cleared and subsequently used for truck parking. Materials in this area are associated with truck and trailer storage and include temporary storage (associated with the trucks) of small amounts of diesel fuel, hydraulic oil, antifreeze, and gear oil.
- **1N1E09BA 2200 (southwest).** Only the far southwestern corner of this tax lot is within the Facility (see Figures 2 and 3). This portion of the tax lot includes a gravel surface and has exclusively been used for truck parking since 1990. Prior to that is was used as rural residential from at least 1924 until approximately 1970, when it was cleared and subsequently used for truck parking. Materials in this area are associated with truck and trailer storage and include temporary storage (associated with the trucks) of small amounts of diesel fuel, hydraulic oil, antifreeze, and gear oil.
- **1N1E09BA 2300 (southwest).** The northeast portion of this tax lot drains northward. Only a small area that of the concrete weigh scale area and a limited portion of asphalted surface drains to Basin 60. The area was used as rural residential from at least 1924 until approximately 1994, when it was cleared and subsequently used for truck parking. No materials are stored here.
- **1N1E09BA 2400.** This tax lot has been used for truck and tanker trailer parking with a gravel surface since 1994. Prior to that the area was used as rural residential from at least 1924. Materials in this area are associated with truck and trailer storage and include temporary storage (associated with the trucks) of small amounts of diesel fuel, hydraulic oil, antifreeze, and gear oil.
- **1N1E09BA 2500** This tax lot has been used for truck and tanker trailer parking with a gravel surface since 1994. Prior to that the area was used as rural residential from at least 1924. Materials in this area are associated with truck and trailer storage and include temporary

storage (associated with the trucks) of small amounts of diesel fuel, hydraulic oil, antifreeze, and gear oil.

- **1N1E09BA 2800** This tax lot has been used for truck and tanker trailer parking with a gravel surface since at least 1994. Prior to that the area was used as rural residential from at least 1924. Materials in this area are associated with truck and trailer storage and include temporary storage (associated with the trucks) of small amounts of diesel fuel, hydraulic oil, antifreeze, and gear oil.
- **1N1E09BA 2900** This tax lot has been used for truck and tanker trailer parking with a gravel surface since at least 1994. Prior to that the area was used as rural residential from at least 1924. Materials in this area are associated with truck and trailer storage and include temporary storage (associated with the trucks) of small amounts of diesel fuel, hydraulic oil, antifreeze, and gear oil.

Areas of the taxlots of interest that are outside of the Facility are described in greater detail below.

- **1N1E09BA 2100 (northeast)**. One building is present on the furthest NE corner of this lot. The remainder has been a gravel surface since at least 1990. The building has historically operated as office space for a towing company (no stored cars), a signage company, and is currently being used for storage of household products for Blue Line Transportation. Materials stored in the building have included minimal amounts of household cleaners and equipment. Materials associated with the truck parking area include temporary storage (associated with the trucks) of small amounts of diesel fuel, hydraulic oil, antifreeze, and gear oil.
- **1N1E09BA 2200 (northeast)**. The entire eastern half of the lot drains northward; only the western half drains is within Basin 60. The northeast area includes a large warehouse building that is used for truck maintenance. Inside the building, approximately 275-gallons of 15/40 engine oil is stored, as well as several 55-gallon drums of transmission oil, gear oil, hydraulic fluid, grease, and anti-freeze. Other *de minimis* quantities of typical engine repair materials are stored. Outside of the building is a 4,000-gallon double walled waste oil above-ground tank (AST). The entire eastern half of the lot drains northward and none of the lot is located within Basin 60.
- **1N1E09BA 2300 (northeast)**. This tax lot has been used as a cardlock fueling area and scale since at least 1990. The fueling area includes three dispensers (two diesel pumps and one gasoline pump) and one 20,000-gallon UST containing diesel and one 4,000-gallon UST containing gasoline. The surface of the scale and cardlock fueling area is concrete surfaced to drain to an oil-water separator (OWS) which is connected to the municipal sewer system. Stormwater generated outside of the immediate scale and fueling area drains northward except a small asphalt area to the west that drains to Basin 60.

CITY STORMWATER CONVEYANCE SYSTEM

The Facility does not currently operate under a City of Portland Stormwater Pollution Control Plan (SWPCP) or 1200-z stormwater permit. Overland stormwater flow within the Facility drains to the City stormwater system features (City Hansen ID⁴) identified in the table below. Relevant features (typically a catch basin) are shown on Figure 3. The stormwater enters the system via the features and is conveyed to City Outfall 60 where it is discharged to the Columbia Slough. There are no stormwater catch basins or other engineered stormwater collection and control features at the Facility. All stormwater discharge is from overland stormwater runoff.

Nearby properties that are outside of the Facility drain to a private combined sewer, gravity system that drains the northern portion of the facility's overland flow and tie into a combined (sewer and stormwater) gravity main that flows to the northwest once in the conveyance system as shown in Figure 3. A total of seven catch basins are identified to potentially receive stormwater runoff from the Facility. The Facility tax lots correspond to the nearest downgradient catch basin as outlined in the introduction table. A portion of tax lot 900 may also drain to an adjacent, off-site private property catch basin which in-turn drains to the City's conveyance system.

Address (all in Portland, OR 97217)	Tax Lot ID Prefix	Tax Lot ID Suffix	Stormwater System Feature (City Hansen ID ⁵)
9243 W/N Burrage Ave	1N1E09BA	1700	ANB989
9243 W/N Burrage Ave	1N1E09BA	2000	ANB990
9243 W/N Burrage Ave	1N1E09BA	2100	--
SEC/ Newark & N Peninsular Ave	1N1E09BA	400	ANB987
N Columbia Blvd	1N1E09BA	900	ANB988
2606 N Newark St.	1N1E09BA	2200	--
2606 N Newark St.	1N1E09BA	2300	ANB992
9130 N Burrage Ave	1N1E09BA	2400	ANB991
9130 N Burrage Ave	1N1E09BA	2500	ANB991
9127 N Wilbur Ave	1N1E09BA	2800	ANB992
9127 N Wilbur Ave	1N1E09BA	2900	ANB992

⁴ The sample location represents the City's Hansen identification number which represents a specific stormwater feature (e.g., catch basin, manhole, outfall). Final sample locations was based on site reconnaissance and review of site stormwater drainage (e.g., lateral connection).

⁵ The sample location represents the City's Hansen identification number which represents a specific stormwater feature (e.g., catch basin, manhole, outfall). Final sample locations was based on site reconnaissance and review of site stormwater drainage (e.g., lateral connection). Information was obtained from the City's *Source Tracing Investigation and Basin Characterization: 2022-2023, Evaluation of City Stormwater Outfall Basins Discharging to the Columbia Slough*. May 2024.

ENVIRONMENTAL HISTORY

The environmental history of each property within the Facility is presented below. The history is based on interviews with Jason Tindall (Blue Line), and a review of historical Sanborn fire insurance maps (1924 – 1969), historical aerial photographs (1936 – 2023), and other available documents. Within the Facility, no previous environmental investigations have been completed. In general, large portions of the Facility have been used to park truck and tanker trailers in recent history. Historically and currently, tanker trailers that contained residual dust suppressant and asphalt were cleaned by manual scraping north of taxlot 2200 and outside of the Facility. Any wash down from the cleaning is conveyed to the combined sewer system. No loaded tanker trailers are stored onsite (except in rare occasions such as snow road closure events). None of the materials stored within the tankers (e.g., dust suppressors) are known to have contained PCBs. Details descriptions for each taxlot are presented below.

- **1N1E09BA 400.** No significant environmental spills, releases, or other environmental concerns were identified at this tax lot.
- **1N1E09BA 900.** This tax lot has been an undeveloped lot with an asphalt surface since 1990. Aerial imagery shows it is occasionally used for vehicle parking. The adjacent NW Cast site (ECSI 999) to the east has historically included elevated PCBs and metals in surface soil; however, the soil has been removed from the Site and clean gravel used for backfill. During remediation of the NW Cast site (not considered within the Facility), it was reported that a small amount of soil may have been temporarily stockpiled at on this lot. It should be noted that remedial excavation and backfilling of NW Cast did not extend to this lot. Based on the lack of evidence that PCBs extended into this area, it is not likely that this lot is a source of PCBs. However, confirmation sampling could be conducted to confirm this.
- **1N1E09BA 1700.** No significant historical environmental concerns were identified at this tax lot.
- **1N1E09BA 2000.** No significant historical environmental concerns were identified at this tax lot.
- **1N1E09BA 2100.** No significant environmental spills, releases, or other environmental concerns were identified at this tax lot.
- **1N1E09BA 2200.** No significant environmental spills, releases, or other environmental concerns were identified at this tax lot.
- **1N1E09BA 2300.** No significant environmental spills, releases, or other environmental concerns were identified at this tax lot.

- **1N1E09BA 2400.** No significant environmental spills, releases, or other environmental concerns were identified at this tax lot.
- **1N1E09BA 2500** No significant environmental spills, releases, or other environmental concerns were identified at this tax lot.
- **1N1E09BA 2800** No significant environmental spills, releases, or other environmental concerns were identified at this tax lot.
- **1N1E09BA 2900** No significant environmental spills, releases, or other environmental concerns were identified at this tax lot.

POTENTIAL CONTAMINANT SOURCES

Based on the review of current operations and historical environmental history, the following potential contaminant sources are present at or near the Facility:

- **Illegal dumping and street racing.** Illegal dumping of fluorescent light bulbs, car parts, tires, brake pads, and other materials have been documented at and near the Facility (including adjacent to the catch basins) by DEQ, Blue Line and others (see attached Photo Log for example). According to Jason Tindall, Blue Line has found such debris dumped on a regular basis (multiple times per year). Additionally, debris associated with illegal street racing (ie., tire material, brake dust, etc.; see Photo Log) have been observed. Brake and tire dust are potential sources of TPH, PAHs, metals, and other contaminants.. In January 2025, DEQ noted that fluorescent light bulbs had been dumped near off-Facility catch basin ANN198. While the catch basin is off-Facility, it drains to the City conveyance system upgradient of the Facility (see Figure 3). The dumping are a likely source of mercury, PCBs, PAHs, and other contaminants. Therefore, we consider illegal dumping a potential source.
- **Off-site sources.** Basin 60 also drains significant portions of North Columbia Boulevard and railroad thoroughfares. It is very likely that the highway and other off-site areas are a source of metals, PCBs, PAHs, and other contaminants from brake dust, fuel and oil drippage, and similar sources. Therefore, we consider the North Columbia Boulevard a potential source.
- **Catch Basin and City Conveyance System.** ACC and Blue Line are not aware of the most recent time that the catch basins and related City conveyance system were emptied of sediment and cleaned. We understand this as a responsibility of the City of Portland. If the system has not been emptied and cleaned of sediment since before remedial activities, it is possible that they still contain sediment from historical runoff. Therefore, we consider the City stormwater conveyance system a potential source.

- **Truck storage and maintenance.** While no significant releases or spills of petroleum hydrocarbons have occurred at the Facility, given the on-site truck fueling, storage, and maintenance activities, it is possible that drippage or spillage of petroleum hydrocarbons could impact surface soil and/or stormwater which could then be conveyed to the stormwater collection system. Therefore, the potential conveyance of sediment impacted by petroleum spillage/drippage from truck operations is considered a potential source of hydrocarbons and PAHs.
- **Taxlot 1N1E09BA 900.** Based on our review, we identified no obvious source of PCBs or significant metals from portions of the Facility that are within the stormwater drainage basin for Outfall 60. While the NW Cast site has historically included elevated PCBs and metals in surface soil, the soil has been removed from the Site and clean gravel used for backfill. It should be noted that remedial excavation and backfilling did not occur in a small triangular area adjacent to the most southwestern corner of the NW Cast site. Excavation was not extended to this area based on field screening of soil that was conducted during the excavation operations. Based on the lack of evidence that PCBs extended into this area, we do not consider this a likely source of PCBs. However, if any residual contamination is present, it could introduce sediment with PCBs to the City conveyance system. Therefore, we consider taxlot 1N1E09BA 900 a potential source.

CONTAMINANTS OF INTEREST

Based on the historical stormwater sampling, environmental history, and identification of potential contaminant sources, the following are considered contaminants of interest (COIs) associated with the Facility:

1. Polychlorinated biphenyls (PCBs);
2. Total petroleum hydrocarbons as gas (TPH-g) and diesel/oil (TPH-d/o);
3. DEQ risk-based decision making volatile organic compounds (VOCs);
4. Polycyclic aromatic hydrocarbons (PAHs); and
5. Metals (arsenic, cadmium, chromium, copper, lead, mercury, nickel, and zinc).

FINDINGS AND CONCLUSIONS

Based on our review, no significant likely sources have been identified at the Facility. Recommended source control measures associated with minor potential sources that were identified at the Facility include:

- **Truck parking and maintenance area.** These operations are present throughout the majority of the southern portion of the Facility. We recommend that Blue Line consider installing sediment fencing in areas where unpaved areas contribute storm water to the Basin 60

conveyance system. The truck and tanker trailer parking is a potential source of COIs including TPH, VOCs, PAHS, and/or metals.

- **Taxlot 1N1E09BA 900 sampling.** Based on the historical soil screening, we do not consider this a likely source. However, sampling shallow soil at taxlot 1N1E09BA 900 may assist in understanding if any residual contaminated soil is present that might be contributing PCBs. If identified, any contaminated soil should be immediately removed and the area backfilled. Up to 5 shallow soil borings may be advanced in this area to characterize shallow soil conditions.

Off-site sources including North Columbia Boulevard and illegal dumping are likely impacting water quality in Basin 60. Potential measures for these sources could include:

- **Catch Basin and City Conveyance System.** Determine the most recent sediment cleanout and City conveyance system cleaning. If the system has not been cleaned since remediation, it should be emptied/cleaned and materials properly characterized and disposed.
- **Illegal dumping/street racing.** Source control measures for this are difficult and could include greater security and control efforts from the City to reduce illegal dumping and illegal street racing.
- **Off-site sources.** Installation of catch basin filters inserts, sediment controls and other stormwater controls to reduce sediment and contaminant loads from the North Columbia Boulevard throughfare could improve water quality with Basin 60.

We appreciate the opportunity to assist you. Please contact the undersigned at 503.475.6835 if you have questions regarding the information provided memorandum.

Sincerely,

Christopher Sheridan

Christopher Sheridan, R.G.
PNW Subsurface Lead

cc. Jason Tindall, Blue Line Transportation

Figures

Figure 1 – Site Location Map

Figure 2 – Site Overview Facility Map

Figure 2 – City Stormwater Conveyance System

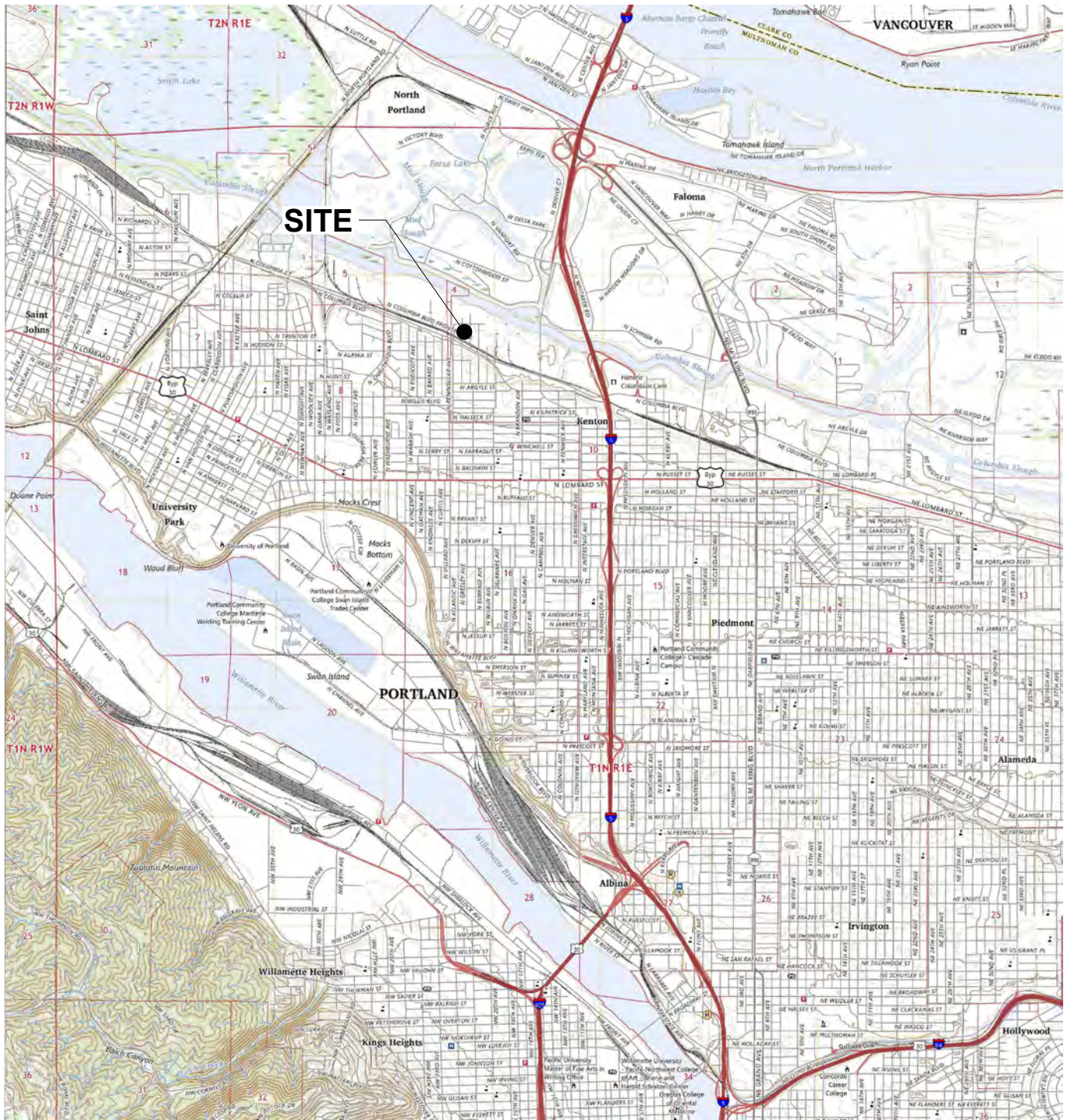
Attachments

Photograph Log

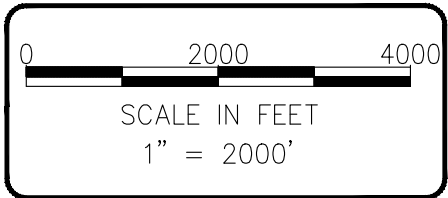
Sanborn Fire Insurance Maps (1924 – 1969)

Aerial Photographs (1936 – 2023)

FIGURES



NOTE(S):
 USGS, PORTLAND QUADRANGLE
 OREGON - WASHINGTON
 7.5 MINUTE SERIES (TOPOGRAPHIC)



DATE: 10-25-24
 DWN: SS
 CHK: CS
 APPROVED: CS
 PRJ. MGR: CS
 PROJECT NO:
 10366-001

FIGURE 1
 SITE LOCATION MAP
 BLUE LINE SCE
 Near 9233 NW CAST
 PORTLAND, OREGON

Address	Tax Lot ID Prefix	Tax Lot ID Suffix
(all in Portland, OR 97217)		
9243 W/N Burrage Ave	1N1E09BA	1700
9243 W/N Burrage Ave	1N1E09BA	2000
9243 W/N Burrage Ave	1N1E09BA	2100
SEC/ Newark & N Peninsular Ave	1N1E09BA	400
N Columbia Blvd	1N1E09BA	900
2606 N Newark St.	1N1E09BA	2200
2606 N Newark St.	1N1E09BA	2300
9130 N Burrage Ave	1N1E09BA	2400
9130 N Burrage Ave	1N1E09BA	2500
9127 N Wilbur Ave	1N1E09BA	2800
9127 N Wilbur Ave	1N1E09BA	2900

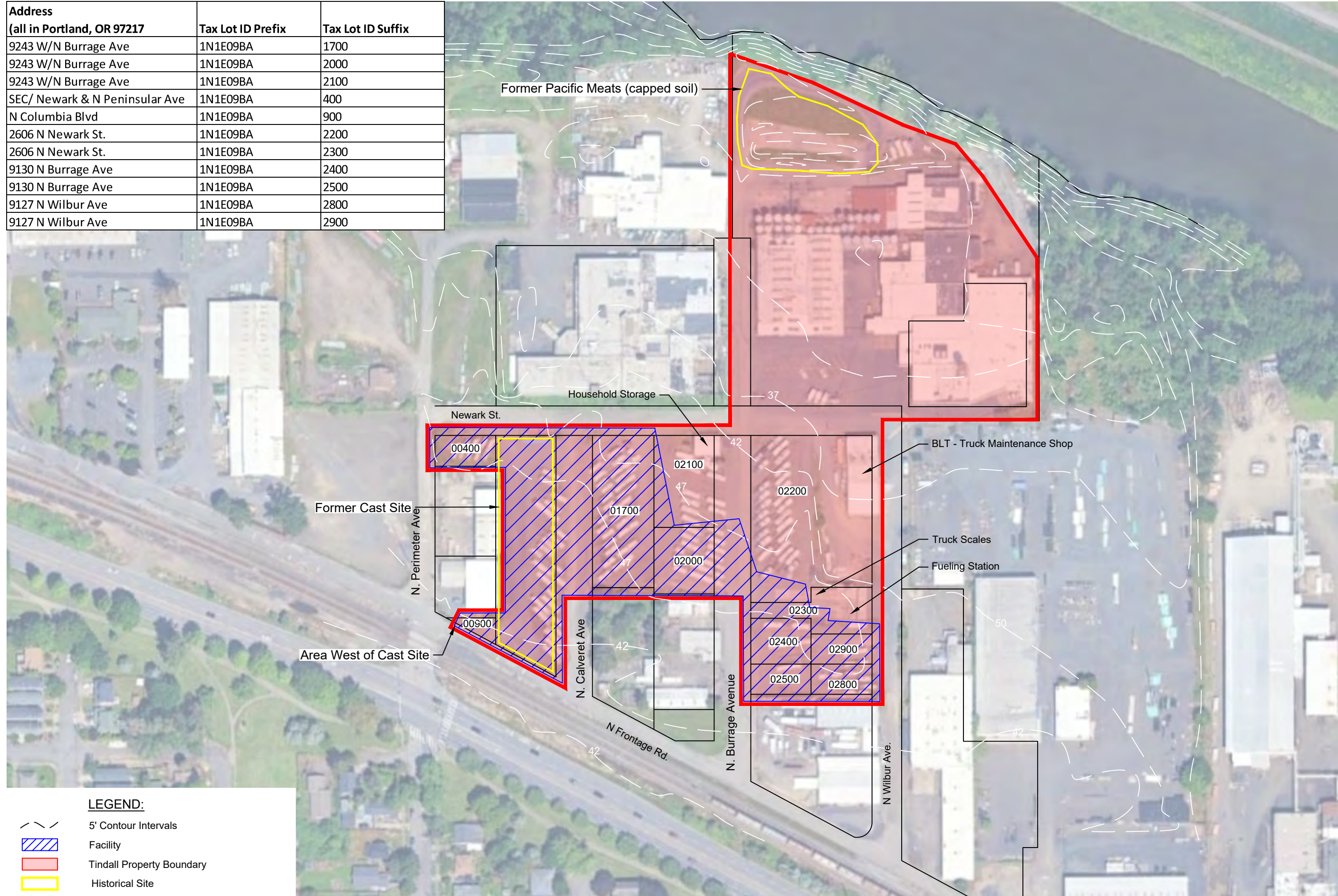
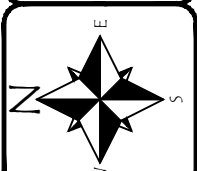
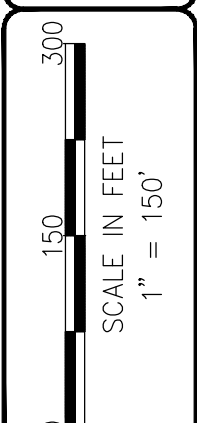


FIGURE 2
SITE OVERVIEW FACILITY MAP
BLUE LINE TRANSPORTATION
PORTLAND, OR.

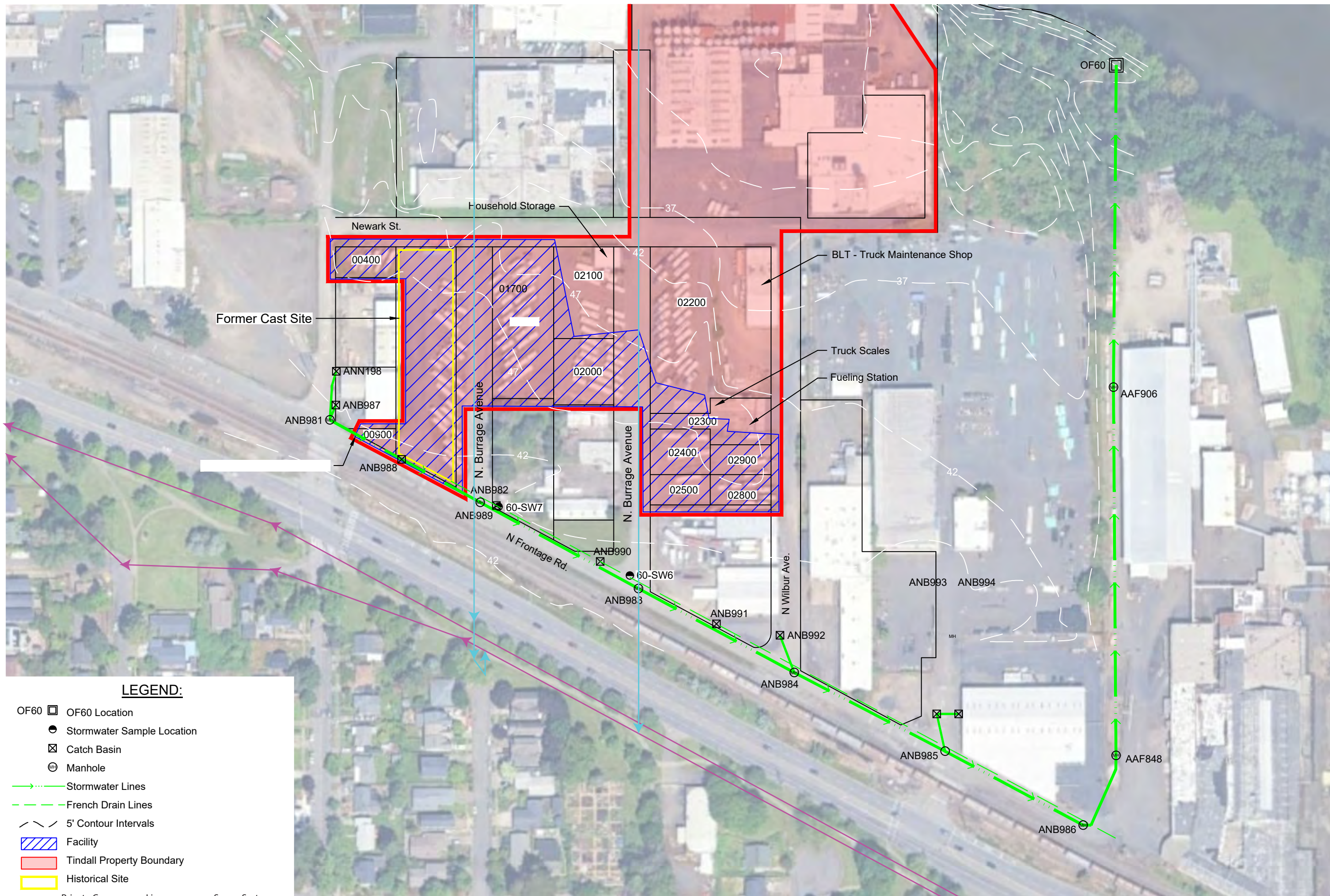
DATE: 4-22-25
DWN: JJT
CHK: CS
APPROVED: CS
PRJ. MGR: CS
PROJECT NO: 10366-001.00



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- LEGEND:**
- 5' Contour Intervals
 - Facility
 - Tindall Property Boundary
 - Historical Site

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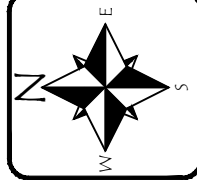
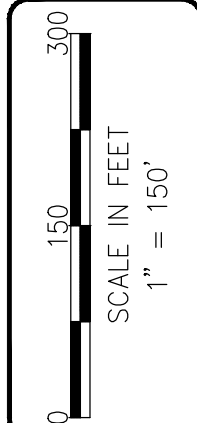


LEGEND:

- OF60 OF60 Location
- Stormwater Sample Location
- Catch Basin
- Manhole
- Stormwater Lines
- French Drain Lines
- 5' Contour Intervals
- Facility
- Tindall Property Boundary
- Historical Site
- Private Conveyance Lines
- Sewer System

FIGURE 3
FACILITY MAP AND
STORMWATER CONVEYANCE SYSTEM
BLUE LINE TRANSPORTATION
PORTLAND, OR.

DATE: 4-22-25
DWN: JUT
CHK: CS
APPROVED: CS
PRJ. MGR: CS
PROJECT NO: 10366-001.00



ATTACHMENTS

Blue Line Transportation – Updated SCE Background Review

2601 N Newark ■ Portland, OR 97217

Project No. 10366-001.00 ■ September 12, 2024



Photo #1 ANB990: Potentially receiving from 9243 W/N Burrage Ave – Tax Lot Suffix 2000 (view from N Frontage Rd)



Photo #2 Dilapidated electrical panel – Just north of ANB990 (view from N Frontage Rd)



Photo #3 ANB991: Potentially receiving from 9130 N Burrage Ave – Tax Lots 2400 & 2500 (view from N Frontage Rd)



Photo #4 ANB989: Receiving from 9243 W/N Burrage Ave – Tax Lot 1700 (on N Calvert, looking SE towards N Frontage Rd)



Photo #5 ANB988: Receiving from N Colombia Blvd – Tax Lot 900 (view West looking down N Frontage Rd, NW Cast is to the right).



Photo #6 ANB988: View North from N Frontage Rd, looking at former NW Cast Lot.

Blue Line Transportation – Updated SCE Background Review

2601 N Newark ■ Portland, OR 97217

Project No. 10366-001.00 ■ September 12, 2024



Photo #3 Taxlot 400 facing east.



Photo #4 Small bare area of taxlot 900 adjacent to off-Facility building, facing northeast.



Photo #7 Taxlot 1700, facing south.



Photo #8 Taxlot 2000, facing northwest.



Photo #9 Taxlot 2100, facing northwest.



Photo #10 Taxlot 2300 with fueling area including UST and dispensers, facing east.

Blue Line Transportation – Updated SCE Background Review

2601 N Newark ■ Portland, OR 97217

Project No. 10366-001.00 ■ September 12, 2024



Photo #5 Taxlot 2400, facing east.



Photo #6 Taxlot 2500, facing east.

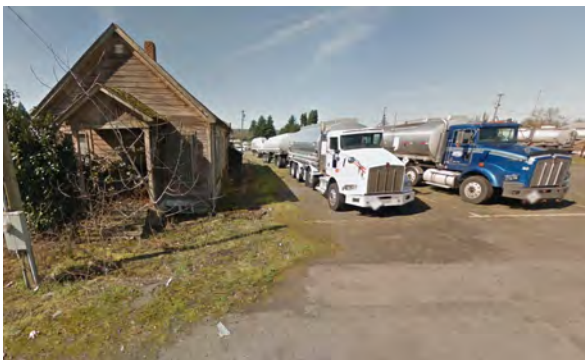


Photo #11 Taxlot 2800, facing west.



Photo #12 Taxlot 2900, facing west.



Photo #13 Illegal dumping along N. Calveret Ave. (east side) and hydraulically upgradient of ANB982/ANB989.

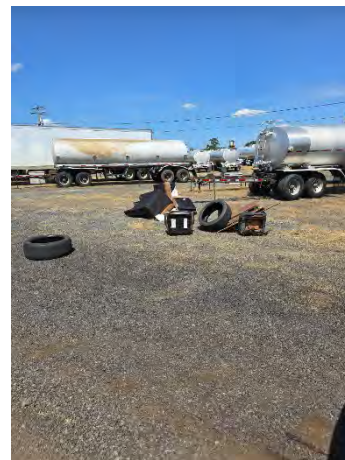


Photo #14 Illegal dumping along N. Calveret Avenue (west side) and hydraulically upgradient of ANB982/ANB989.

Blue Line Transportation – Updated SCE Background Review

2601 N Newark ■ Portland, OR 97217

Project No. 10366-001.00 ■ September 12, 2024

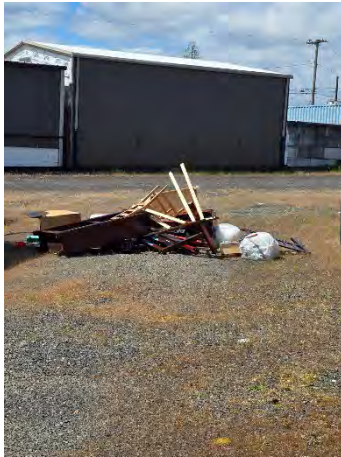



Photo #7 Illegal dumping along the former NW Cast site ANB088.



Photo #8 Tire debris from street racing at intersection of N. Calvert Ave. and N. Frontage Road (near ANB982/ANB989).



Photo #15 Tracks and tire debris from street racing at intersection of N. Calvert Ave. and N. Frontage Road (near ANB982/ANB989).



Blueline Project
2601 N Newark St
Portland, OR 97217

Inquiry Number: 8106054.1
September 12, 2025

Certified Sanborn® Map Report



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

Certified Sanborn® Map Report

09/12/25

Site Name:

Blueline Project
2601 N Newark St
Portland, OR 97217
EDR Inquiry # 8106054.1

Client Name:

ACC Environmental Consultants, Inc.
300 W 15th St. Suite 212
Vancouver, WA 98660
Contact: Anna Martin



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PO # 10366-001.00

Project Blueline Project

Maps Provided:

1969
1950
1924



Sanborn® Library search results

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Sanborn Sheet Key

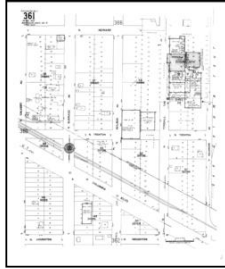
This Certified Sanborn Map Report is based upon the following Sanborn Fire Insurance map sheets.



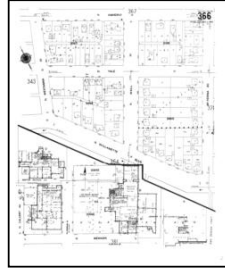
1969 Source Sheets



Volume 3, Sheet 360
1969

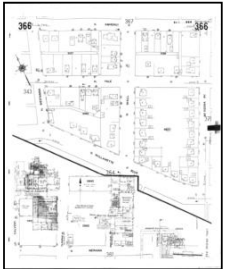


Volume 3, Sheet 361
1969



Volume 3, Sheet 366
1969

1950 Source Sheets



Volume 3, Sheet 366
1950



Volume 3, Sheet 361
1950



Volume 3, Sheet 360
1950

1924 Source Sheets



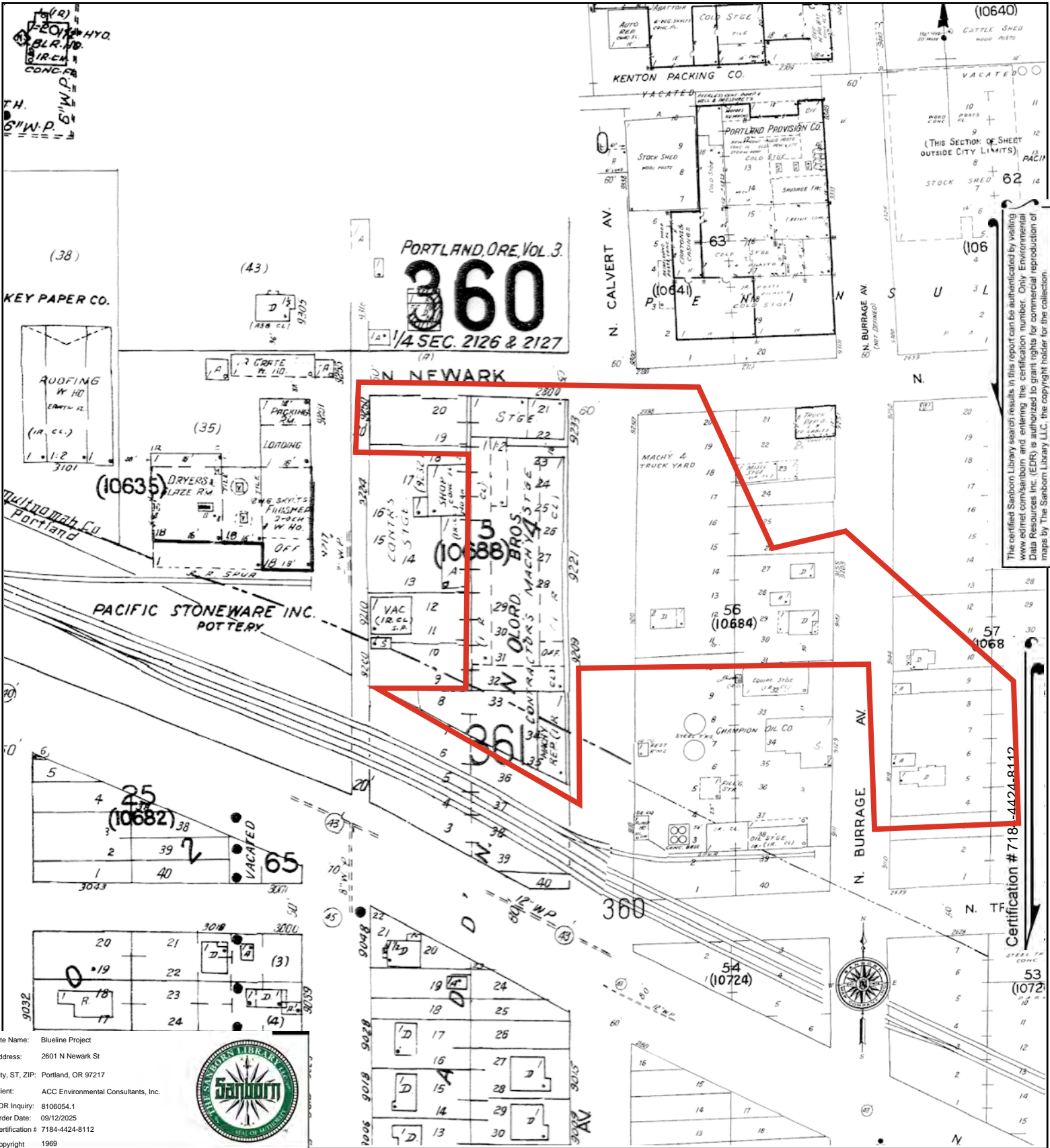
Volume 3, Sheet 360
1924



Volume 3, Sheet 361
1924



Volume 3, Sheet 366
1924

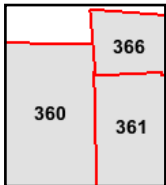
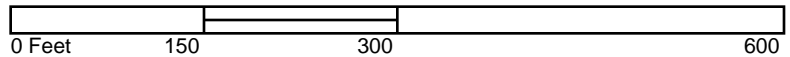


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Site Name: BlueLine Project
 Address: 2601 N Newark St
 City, ST, ZIP: Portland, OR 97217
 Client: ACC Environmental Consultants, Inc.
 EDR Inquiry: 8106054.1
 Order Date: 09/12/2025
 Certification # 7184-4424-8112
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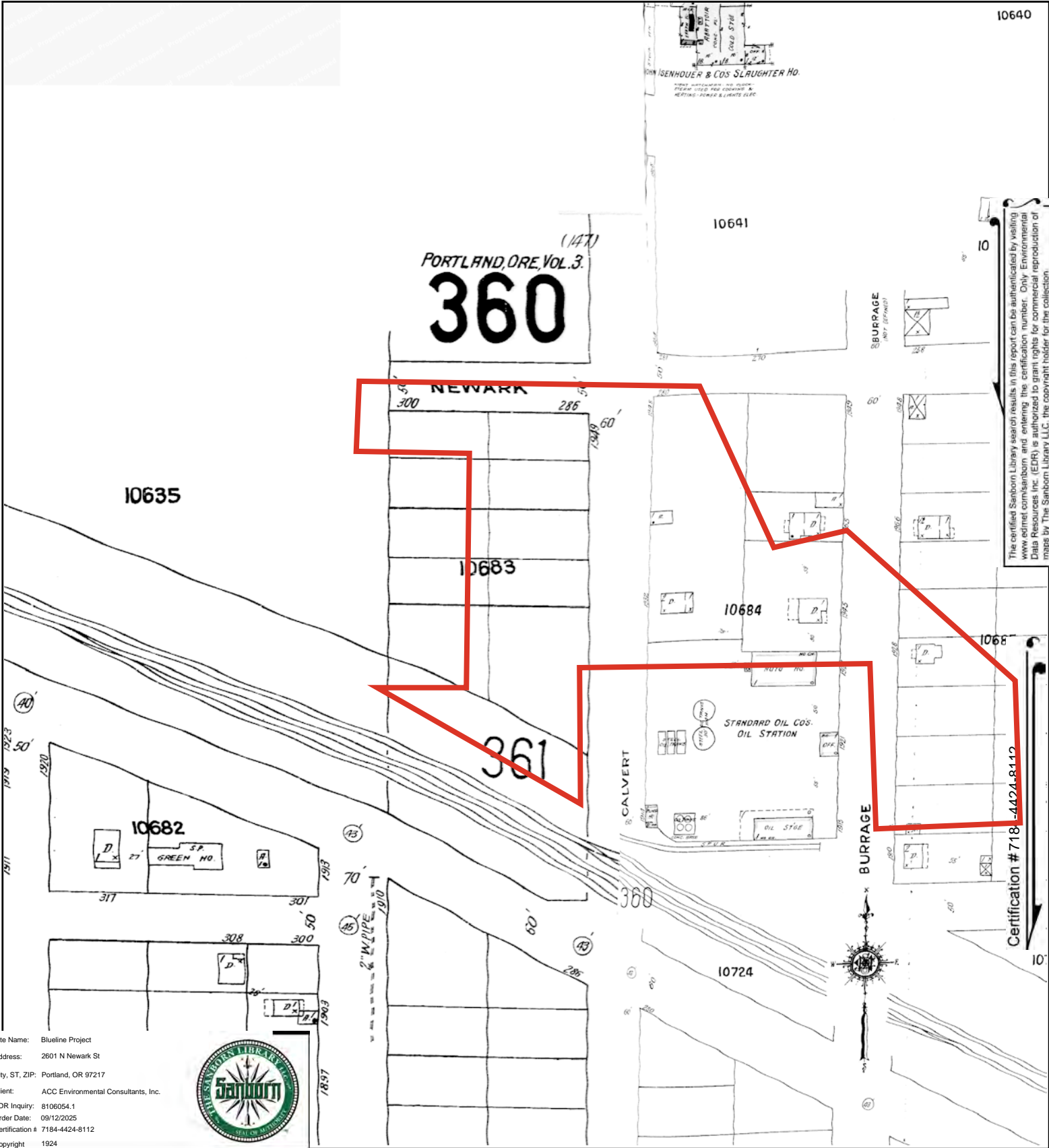


This Certified Sanborn Map combines the following sheets.
 Outlined areas indicate map sheets within the collection.



Volume 3, Sheet 366
 Volume 3, Sheet 361
 Volume 3, Sheet 360



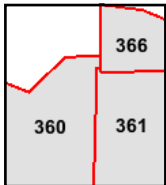
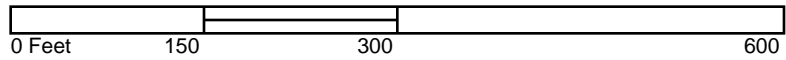


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 EDR Inquiry: 8106054.1
 Order Date: 09/12/2025
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Volume 3, Sheet 366
 Volume 3, Sheet 361
 Volume 3, Sheet 360





Blueline Project

2601 N Newark St

Portland, OR 97217

Inquiry Number: 8106054.3

September 12, 2025

The EDR Aerial Photo Decade Package



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Aerial Photo Decade Package

09/12/25

Site Name:

Blueline Project
2601 N Newark St
Portland, OR 97217
EDR Inquiry # 8106054.3

Client Name:

ACC Environmental Consultants, Inc.
300 W 15th St. Suite 212
Vancouver, WA 98660
Contact: Anna Martin



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Search Results:

<u>Year</u>	<u>Scale</u>	<u>Details</u>	<u>Source</u>
2023	1"=500'	Flight Year: 2023	USDA/NAIP
2020	1"=500'	Flight Year: 2020	USDA/NAIP
2017	1"=500'	Flight Year: 2017	USDA/NAIP
2014	1"=500'	Flight Year: 2014	USDA/NAIP
2011	1"=500'	Flight Year: 2011	USDA/NAIP
2006	1"=500'	Flight Year: 2006	USDA/NAIP
2000	1"=500'	Flight Year: 2000	USGS/DOQQ
1994	1"=500'	Flight Year: 1994	USGS/DOQQ
1990	1"=500'	Flight Year: 1990	USGS/DOQQ
1981	1"=500'	Flight Date: July 26, 1981	USDA
1975	1"=500'	Flight Date: September 13, 1975	USGS
1970	1"=500'	Flight Date: July 05, 1970	USGS
1960	1"=500'	Flight Date: July 17, 1960	USGS
1955	1"=500'	Flight Date: August 06, 1955	USDA
1951	1"=500'	Flight Date: July 27, 1951	USGS
1948	1"=500'	Flight Date: July 24, 1948	USDA
1936	1"=500'	Flight Date: May 12, 1936	ACOE

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INQUIRY #: 8106054.3

YEAR: 2023

— = 500'





INQUIRY #: 8106054.3

YEAR: 2020

— = 500'





INQUIRY #: 8106054.3

YEAR: 2017

— = 500'





INQUIRY #: 8106054.3

YEAR: 2014

— = 500'





INQUIRY #: 8106054.3

YEAR: 2011

— = 500'





INQUIRY #: 8106054.3

YEAR: 2006

— = 500'





INQUIRY #: 8106054.3

YEAR: 2000

— = 500'





INQUIRY #: 8106054.3

YEAR: 1994

— = 500'





INQUIRY #: 8106054.3

YEAR: 1990

— = 500'





INQUIRY #: 8106054.3

YEAR: 1981

— = 500'





INQUIRY #: 8106054.3

YEAR: 1975

— = 500'





INQUIRY #: 8106054.3

YEAR: 1970

— = 500'





INQUIRY #: 8106054.3

YEAR: 1960

— = 500'





INQUIRY #: 8106054.3

YEAR: 1955

— = 500'





INQUIRY #: 8106054.3

YEAR: 1951

— = 500'





INQUIRY #: 8106054.3

YEAR: 1948

— = 500'





INQUIRY #: 8106054.3

YEAR: 1936

— = 500'



ATTACHMENT B
STANDARD OPERATING PROCEDURES

STANDARD OPERATING PROCEDURE

HYDROCARBON FIELD SCREENING

GENERAL

This standard operating procedure (SOP) presents the qualitative field screening methods for hydrocarbons in soil. Field screening results are site-specific. The results may vary with soil type, soil moisture and organic content, ambient air temperature, and type of contaminant.

Field screening will be conducted on soil samples obtained from exploratory boreholes or excavations. Field screening results are used as a general guideline to delineate areas with potential residual hydrocarbons in soils. In addition, field screening results are used as a basis for selecting soil samples for chemical analysis. The field screening methods employed include 1) visual examination, 2) sheen testing, and 3) headspace vapor testing using an Mini Rae 2000 photoionization detector (PID) (or equivalent) calibrated to isobutylene. Sheen testing and headspace vapor testing are more sensitive screening methods that have been effective in detecting hydrocarbon concentrations below typical underground storage tank (UST) regulatory cleanup guidelines. The results of headspace and sheen screening should be included on the borehole logs or field notes.

VISUAL SCREENING

Visual screening consists of inspecting the soil for the presence of stains indicative of residual petroleum hydrocarbons. Visual screening is generally more effective in detecting the presence of heavier petroleum hydrocarbons, such as motor oil, or when hydrocarbon concentrations are high. Indications of the presence of hydrocarbons typically include a mottled appearance or dark discoloration of the soil.

SHEEN TESTING

Sheen testing involves immersion of the soil sample in water and observing the water surface for signs of sheen. A representative soil sample is placed into a clean stainless steel or plastic pan filled with clean water with as little disturbance as possible. Visual evidence of sheen forming on the surface of the water is classified as follows:

- No sheen (NS): No visible sheen on the water surface

- Colorless Sheen (CS): Light, nearly colorless sheen; spread is irregular, not rapid; film dissipates rapidly (Note: light colorless sheens can be confused with sheens produced by organic content). Note that this sheen may or may not indicate the presence hydrocarbons.

- Heavy Sheen (HS): Light to heavy colorful film with iridescence; stringy, spread is rapid; sheen flows off the sample; most or all of water surface is covered with sheen

Following the sheen test, the pan must be decontaminated with methanol and distilled water prior to the next sampling event.

HEADSPACE VAPOR SCREENING

Headspace vapor screening involves placing a small representative soil sample in a plastic sample bag. The sealed sample bag should be allowed to sit at ambient temperature for approximately ten minutes. The sample bag is then shaken slightly to promote volatilization to the air trapped in the bag. The probe of a PID equipped with a 10.6 eV bulb or equivalent, calibrated to isobutylene, is inserted into the bag to withdraw air from the bag. The instrument measures the concentration of organic vapors within the sample bag headspace in parts per million (ppm).

STANDARD OPERATING PROCEDURE SOP

STORMWATER SAMPLING

1.0 General

This standard operating procedure is designed to assist the technician in taking representative stormwater samples from catch basins, manholes, or similar features. Other industry standards may be referenced to facilitate sampling.

2.0 Preparation

- Review requirements: Understand your facility's specific permit requirements and review the weather forecast.
- Pack equipment: Ensure your sampling kit is complete, including necessary PPE, a pre-chilled cooler with enough ice, sample bottles, and labeling materials.
- Label bottles: Before going to the site, label each sample bottle with the site ID, date, and time of collection.
- Calibrate all field instruments at the start of each day following the instrument manufacturer's instructions. Record calibration data on field form.

3.0 Sample collection

- Safety first: Wear appropriate PPE, be visible, and use the buddy system if possible, especially in traffic areas. Avoid smoking, eating, or drinking while sampling.
- Find the right location: Go to the designated sampling point, which should be downstream of all stormwater Best Management Practices (BMPs) and at a point where the water is flowing.
- Collect field parameters: Collect field measurements for pH, temperature (T), conductivity (Ec), oxygen reduction potential (ORP), dissolved oxygen (DO), and turbidity (TU) using a water quality meters. All water chemistry field measurements will be documented on the appropriate field form.
- Collect a grab sample:
 - Use a "grab" technique, taking the sample in a single, uninterrupted event from a single outfall.
 - Submerge the bottle about halfway down the water column.
 - Face upstream when collecting to avoid contamination from your own disturbance.

- Tip the bottle upstream and then turn it so the opening faces the flow to fill it.
- Avoid stirring up sediment from the bottom.
- Rinse the bottle three times with the ambient water before the final fill, swirling and dumping the rinse water downstream away from the sampling site.
- Fill the bottle to the required volume and secure the cap tightly.
- Take field measurements: Measure pH in the field using a calibrated meter or paper.
- Document everything: Record all information on your sampling log.

4.0 Post-collection

- Secure samples: Return the bottle to its bag and place it in the cooler.
- Handle shipping: Ship samples via overnight delivery to the lab during their operating days and use proper packaging.
- File reports: Submit a "No-Flow" report if a qualifying storm event did not occur.

STANDARD OPERATING PROCEDURE

MANUAL SOIL AND SEDIMENT SAMPLING

1 MANUAL SOIL AND SEDIMENT SAMPLING

The following standard procedures are followed during sample collection:

- Soil samples are collected using a clean, decontaminated hand auger, shovel, or other manual device.
- The recovered sample is opened on a clean surface using a decontaminated knife or specialized cutter. Representative soils are quickly transferred to appropriate sample containers and sample disturbance is minimized. Each sample container is immediately labeled and sealed.
- Sediment samples will be transferred into a clean, decontaminated stainless steel mixing bowl for homogenization before being transferred to laboratory-provided sample jars. Care will be taken not to over agitate sediment during homogenization in order to minimize potential volatilization of organic compounds.
- Representative portions of each sample are transferred from the sample tube, bowl, auger or shovel to new zip-lock type plastic bags or polyethylene bags and sealed. Volatile head-space vapor readings are then measured as described in the SOP 1 (Hydrocarbon Field Screening for Soil). After head-space measurements have been recorded, a small volume of clean water is added to the soil. After agitation, the soil-water mixture is observed for visible sheen.
- Soil samples will be stored in coolers on ice prior to delivery to the selected laboratory.
- Following sample collection and logging, the equipment is decontaminated in an isolated and dedicated area as follows.
 - All re-usable sampling equipment and down-hole equipment will be decontaminated using a hot pressure washer or in a solution of water and non-phosphatic detergent.
 - The sampling equipment will be rinsed with distilled or de-ionized water following washing.

STANDARD OPERATING PROCEDURE

INCREMENTAL SAMPLING METHODOLOGY

1 ISM SOIL SAMPLING

1.0 General

Incremental Sampling Methodology (ISM) is a method used in the environmental field for taking samples of potentially contaminated soils for chemical analysis in a way that allows accurate characterization of contamination in soils at a site

To achieve the goal of reducing the potential effects of soil heterogeneity on sampling accuracy, the use of ISM at a site must be carefully planned. Specifically, Decision Units (DUs) must be defined appropriately to ensure applicable cleanup levels are met. This is accomplished by taking into account the site history and characteristics in developing a conceptual site model that identifies potential locations of contaminants at the site, considering factors such as releases and transport (e.g., leaching, material disturbance/movement). Laboratory processing and subsampling must also be conducted appropriately to reduce heterogeneity within the collected samples. Verification procedures, such as replicate sampling/subsampling, may be required to confirm that DUs have been defined appropriately, field and within-sample heterogeneity have been sufficiently managed, and data quality objectives are met.

The goal of ISM is to obtain and analyze a sample that contains analytes in the same proportions as the soil throughout a given DU. To achieve this goal, many increments are obtained from a single DU. Another key element of the sampling approach is that replicate samples (typically three, each with the same coverage and representativeness) are collected from the same DU. Traditional discrete soil sampling approaches often employ the collection and analysis of duplicate samples to obtain a percentage of the samples and evaluate data reproducibility. However, in practice, the results for soil duplicate samples, which are intended to represent the concentration at a single location, can often vary widely, even when proper soil sampling procedures are followed. Due to the challenges of addressing unsatisfactory duplicate soil sample results, duplicates are not even collected for some traditional applications. With ISM, replicates are typically collected for each DU, providing much greater insight into the reproducibility of the data, as well as the degree of heterogeneity



1.1 Sample Collection Methodology

ISM samples will be collected generally consistent with the Interstate Technology and Regulatory Council (ITRC) technical guidance for ISM sampling. To obtain an accurate ISM sample for a given DU, a minimum of 30 discrete increments shall be collected per DU. The placement of each DU and number of increments will vary based on the project goals and site conceptual model. The locations of each increment will be loosely based on a gridded system, typically pre-established using aerial photography or other resource. For each ISM sample, increments will consist of approximately 1 gram of soil per increment. For non-volatile analysis, the increments will be field composited in clean, stainless steel bowls and transferred to the laboratory-provided jar. If volatile analyses are required, increments will be directly placed into the laboratory-provided jar (preserved for VOCs) without aggressive compositing (to avoid volatilization). Pre-planning will include discussions with the selected lab to ensure sufficient volume and sample bottles will be used. Sampling tools will be decontaminated between ISM samples. New nitrile gloves will be used by field staff between samples. After collection, ISM samples will be placed on ice and transferred to the selected laboratory for ISM processing and chemical analysis. All samples will be handled using strict chain-of-custody protocols.

ATTACHMENT C
FIELD FORMS



GROUNDWATER SAMPLE COLLECTION FORM

Well I.D. Number: _____

Project Name: _____
 ACC Project #: _____
 Date: _____

Sample I.D. _____ Time: _____
 Field Duplicate I.D. _____ Time: _____
 Personnel: _____

WELL INFORMATION

Monument condition: Good Needs repair Water in Monument
 Well cap condition: Good Replaced Needs replacement Surface Water in Well
 Headspace reading: Not measured _____ ppm Odor _____
 Well diameter: 2-inch 4-inch 6-inch Other _____
 Comments _____

PURGING INFORMATION

Total well depth _____ ft Bottom: Hard Soft Not measured Screen Interval(s): _____
 Depth to product _____ ft
 Depth to water _____ ft Intake Depth (BTOC) _____ Begin Purging Well: _____
 Casing volume _____ ft (H₂O) X _____ gal/ft = _____ gal. X 3 = _____ gal.
 Volume Conversion Factors: 3/4"=0.02 gal/ft 1"=0.04 gal/ft 2"=0.16 gal/ft 4"=0.65 gal/ft 6"= 1.47 gal/ft

PURGING/DISPOSAL METHOD

Pump type Peristaltic Centrifugal Dedicated Bladder Non-Dedicated Bladder Other _____
 Bailer type: _____ Water Disposal: Drummed Remediation System Other _____

FIELD PARAMETERS

Odor and/or Sheen: _____

Time	Water Level (BTOC)	Purge Rate (L/min)	Temp. (°C)	Sp. Cond. (mS/cm) (±3%)	Dissolved Oxygen (±10% or ≤1.00 ±0.2)	pH (SU) (±0.1)	ORP (mV)	Turbidity (NTU) (± 10% or ≤10)

Stabilization achieved if three successive measurements for pH, Conductivity and Turbidity or Dissolved Oxygen are recorded within their respective stabilization criteria. A minimum of six measurements should be recorded.

Purging Comments: _____

SAMPLE INFORMATION

Container Type	Bottle Count	Preservative	Field Filtered?	Analysis
			No 0.45 0.10	
			No 0.45 0.10	
			No 0.45 0.10	
			No 0.45 0.10	
			No 0.45 0.10	

Sampling Comments: _____

