



May 28, 2026

Project No. M1448.01.001

David Lamadrid

Oregon Department of Environmental Quality

700 NE Multnomah St., Suite 600

Portland, OR 97232

Re: Cleanup Program No. 3389 - The Pickle Factory - Former Transformer Storage and Quench Tank Sampling Report

Dear David Lamadrid:

Maul Foster & Alongi, Inc. (MFA) prepared this letter on behalf of The Pickle Factory in response to comments received from the Oregon Department of Environmental Quality (DEQ) on the previously submitted Cleanup Program No. 3389 - The Pickle Factory - Former Transformer Storage and Quench Tank Sampling Report dated November 21, 2025. Based upon DEQ request for additional information, MFA as prepared a response to DEQ comment which is presented in italics followed by MFA's response in bullets.

DEQ Comment

The Report did not address one item in DEQ's September 26, 2025, letter: "DEQ has not received transformer disposal receipts, as requested in DEQ letters dated November 17, 2020, and February 14, 2024. Please make a concerted effort to find and submit to DEQ the requested documentation." Please update DEQ regarding the status of your search for the disposal records.

- On February 6, 2020, Portland Industrial Services removed the transformers. Multiple attempts to obtain disposal receipts from Portland Industrial Services were made between 2020 and 2026. A laboratory report and additional notes were provided by Portland Industrial Services and are included in Attachment A. Total PCBs in each of the three oil samples were all below the 50 parts per million (ppm) threshold under EPA 40 CFR Part 761 which defines the transformers as Non-PCB.¹ It appears that Portland Industrial Services has ceased operations, therefore it is unlikely that the actual disposal receipts will be recovered.

The slag material inside the quench tank does not meet clean fill criteria. It is recommended that the slag material be removed from the quench tank and disposed of at a Subtitle D waste facility.

- On December 12, 2025, 19,220 pounds of slag material was transported by River City Environmental and disposed of at Patriot Environmental Services. The disposal at Patriot Environmental Services was listed under waste information profile (WIP) number 563804. Documentation from River City Environmental and Patriot Environmental Services are included in Attachments B and C, respectively. On March 20, 2026, MFA inspected the empty pit and confirmed the pit was fully enclosed, comprised of concrete, and in good condition. Photographs of the empty pit are included in Attachment D.

¹ <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-R/part-761/subpart-A/section-761.3>

Sincerely,
Maul Foster & Alongi, Inc.



Julianna Wetmore
Project Environmental Scientist



Merideth D'Andrea, RG
Principal Geologist

Attachments

- A—Transformer Disposal Documents
- B—River City Non-Hazardous Waste Manifest
- C—Patriot Environmental Services Waste Information Profile
- D— Photography Log

cc: David Gold <david@goldpdx.com>, Dylan Farwell<dfarwell@naielliott.com>

Limitations

The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.



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Attachment A

Transformer Disposal Documents



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866-900 N. Columbia Blvd.

Portland, OR

"The Pickle Factory LLC"

Transformers – Pole mount located on the East side of Main Building

Transformer #1 – C654558-59

Transformer #2 – C654557-59

Transformer #3 – c654559-39

10/17/2019 – Transformers are pole mounted, visual inspection shows no signs of leakage, all three transformers are constructed for outdoor pole mount use. Transformers are all labeled as PCB, as required for units still in use and of this age (according to epa you must assume that all mineral oil-filled electrical equipment that was manufactured before July 2, 1979 is pcb contaminated until tested) Non Pcb's blue labels located on poles as well. Field test indicates no pcb present above 50ppm.

10/17/2019 – Transformers disconnected and set on ground on sight, verified covers all in place and sealed mechanically, visual inspection showed no signs of leakage from any of the units

Oil samples taken from each unit and delivered to independent certified lab for testing, shows PCB levels under 50ppm, units are non-pcb. Inspection of units shows that cores do not appear to be original to units, previous owner appears to have had the units pumped out, flushed, cores replaced and refilled, but did not re-label correctly or labels did not stay in place.

Attached are the results from JSE labs, which indicate levels well under the 50ppm.

Specialty Analytical

Date Reported: 02-Mar-20

CLIENT: JSE Labs
Project: Gold, 866 N Columbia
Lab ID: 2002225-001
Client Sample ID: OT2000015

Collection Date: 2/27/2020 2:39:00 PM

Matrix: OIL

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB'S IN OIL		SW 8082A				Analyst: ajr
Aroclor 1016	ND	1.00		mg/Kg	1	3/2/2020 12:20:11 PM
Aroclor 1221	ND	1.00		mg/Kg	1	3/2/2020 12:20:11 PM
Aroclor 1232	ND	1.00		mg/Kg	1	3/2/2020 12:20:11 PM
Aroclor 1242	ND	1.00		mg/Kg	1	3/2/2020 12:20:11 PM
Aroclor 1248	ND	1.00		mg/Kg	1	3/2/2020 12:20:11 PM
Aroclor 1254	ND	1.00		mg/Kg	1	3/2/2020 12:20:11 PM
Aroclor 1260	10.7	1.00		mg/Kg	1	3/2/2020 12:20:11 PM
Aroclor 1262	ND	1.00		mg/Kg	1	3/2/2020 12:20:11 PM
Aroclor 1268	ND	1.00		mg/Kg	1	3/2/2020 12:20:11 PM
Surr: Decachlorobiphenyl	0	76.3-151	S	%REC	1	3/2/2020 12:20:11 PM

Specialty Analytical

Date Reported: 02-Mar-20

CLIENT: JSE Labs
Project: Gold, 866 N Columbia
Lab ID: 2002225-002
Client Sample ID: OT2000016

Collection Date: 2/27/2020 2:39:00 PM

Matrix: OIL

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB'S IN OIL		SW 8082A				Analyst: ajr
Aroclor 1016	ND	1.00		mg/Kg	1	3/2/2020 12:37:11 PM
Aroclor 1221	ND	1.00		mg/Kg	1	3/2/2020 12:37:11 PM
Aroclor 1232	ND	1.00		mg/Kg	1	3/2/2020 12:37:11 PM
Aroclor 1242	ND	1.00		mg/Kg	1	3/2/2020 12:37:11 PM
Aroclor 1248	ND	1.00		mg/Kg	1	3/2/2020 12:37:11 PM
Aroclor 1254	ND	1.00		mg/Kg	1	3/2/2020 12:37:11 PM
Aroclor 1260	10.5	1.00		mg/Kg	1	3/2/2020 12:37:11 PM
Aroclor 1262	ND	1.00		mg/Kg	1	3/2/2020 12:37:11 PM
Aroclor 1268	ND	1.00		mg/Kg	1	3/2/2020 12:37:11 PM
Surr: Decachlorobiphenyl	86.5	76.3-151		%REC	1	3/2/2020 12:37:11 PM

Specialty Analytical

Date Reported: 02-Mar-20

CLIENT: JSE Labs
Project: Gold, 866 N Columbia
Lab ID: 2002225-003
Client Sample ID: OT2000017

Collection Date: 2/27/2020 2:39:00 PM

Matrix: OIL

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB'S IN OIL		SW 8082A				Analyst: ajr
Aroclor 1016	ND	1.00		mg/Kg	1	3/2/2020 12:54:11 PM
Aroclor 1221	ND	1.00		mg/Kg	1	3/2/2020 12:54:11 PM
Aroclor 1232	ND	1.00		mg/Kg	1	3/2/2020 12:54:11 PM
Aroclor 1242	ND	1.00		mg/Kg	1	3/2/2020 12:54:11 PM
Aroclor 1248	ND	1.00		mg/Kg	1	3/2/2020 12:54:11 PM
Aroclor 1254	ND	1.00		mg/Kg	1	3/2/2020 12:54:11 PM
Aroclor 1260	10.5	1.00		mg/Kg	1	3/2/2020 12:54:11 PM
Aroclor 1262	ND	1.00		mg/Kg	1	3/2/2020 12:54:11 PM
Aroclor 1268	ND	1.00		mg/Kg	1	3/2/2020 12:54:11 PM
Surr: Decachlorobiphenyl	83.8	76.3-151		%REC	1	3/2/2020 12:54:11 PM

QC SUMMARY REPORT

WO#: 2002225
02-Mar-20

Specialty Analytical

Client: JSE Labs
Project: Gold, 866 N Columbia

TestCode: 8082_O

Sample ID	PWS-703 1PPM	SampType: CCV	TestCode: 8082_O	Units: mg/Kg	Prep Date:	RunNo: 34482						
Client ID:	CCV	Batch ID: 15523	TestNo: SW 8082A	SW3580A	Analysis Date: 3/2/2020	SeqNo: 448918						
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016/1260		10.2	1.00	10.00	0	102	85	115				

Sample ID	MB-15523	SampType:	MBLK	TestCode:	8082_O	Units:	mg/Kg	Prep Date:	2/28/2020	RunNo:	34482		
Client ID:	PBW	Batch ID:	15523	TestNo:	SW 8082A	SW3580A		Analysis Date:	3/2/2020	SeqNo:	448919		
Analyte		Result		PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016		ND		1.00									
Aroclor 1221		ND		1.00									
Aroclor 1232		ND		1.00									
Aroclor 1242		ND		1.00									
Aroclor 1248		ND		1.00									
Aroclor 1254		ND		1.00									
Aroclor 1260		ND		1.00									
Aroclor 1262		ND		1.00									
Aroclor 1268		ND		1.00									
Surr: Decachlorobiphenyl		911			1000		91.1	76.3	151				

Sample ID	PWS-703 1PPM	SampType: CCV	TestCode: 8082_O	Units: mg/Kg	Prep Date:	RunNo: 34482						
Client ID:	CCV	Batch ID: 15523	TestNo: SW 8082A	SW3580A	Analysis Date: 3/2/2020	SeqNo: 448923						
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016/1260		9.64	1.00	10.00	0	96.4	85	115				

Qualifiers: B Analyte detected in the associated Method Blank
O RSD is greater than RSDlimit

ND Not Detected at the Reporting Limit
S Spike Recovery outside accepted reco

Attachment B

River City Non-Hazardous Waste Manifest



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↑ GENERATOR
↓
↑ TRANSPORTER
↓
↑ DESIGNATED FACILITY
↓

NON-HAZARDOUS WASTE MANIFEST		1. Generator ID Number		2. Page 1 of		3. Emergency Response Phone		4. Waste Tracking Number		
5. Generator's Name and Mailing Address <i>Pickle Factory</i>				Generator's Site Address (if different than mailing address) <i>866 N Columbus Blvd. OR</i>						
Generator's Phone:										
6. Transporter 1 Company Name <i>Env City</i>				U.S. EPA ID Number						
7. Transporter 2 Company Name				U.S. EPA ID Number						
8. Designated Facility Name and Site Address <i>Patriot 4947 NW front Ave</i>				U.S. EPA ID Number <i>PDX</i>						
Facility's Phone:										
9. Waste Shipping Name and Description				10. Containers		11. Total Quantity	12. Unit Wt./Vol.			
				No.	Type					
1. <i>Quartz Pit WIP 563804</i>				<i>100</i>	<i>Uc</i>	<i>19200</i>	<i>155</i>			
2.										
3.										
4.										
13. Special Handling Instructions and Additional Information										
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.										
Generator's/Offoror's Printed/Typed Name				Signature				Month	Day	Year
15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: _____										
Transporter Signature (for exports only): _____ Date leaving U.S.: _____										
16. Transporter Acknowledgment of Receipt of Materials										
Transporter 1 Printed/Typed Name				Signature				Month	Day	Year
<i>Ken</i>				<i>[Signature]</i>				<i>7</i>	<i>16</i>	<i>20</i>
Transporter 2 Printed/Typed Name				Signature				Month	Day	Year
17. Discrepancy										
17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection										
Manifest Reference Number:										
17b. Alternate Facility (or Generator)				U.S. EPA ID Number						
Facility's Phone:										
17c. Signature of Alternate Facility (or Generator)				Signature				Month	Day	Year
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a										
Printed/Typed Name				Signature				Month	Day	Year

Attachment C

Patriot Environmental Services Waste Information Profile



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Liquid & Solids Waste Disposal Agreement

Date: 12/29/25

Company: River City

Representative: Dan Zundel

Waste Type: Industrial-NAI Elliot Pickle Factory

Analytical ID: C751i25122409270

Waste Information Profile (WIP) Number: 563804

Location(s): 866 N Columbia Blvd., Portland, OR 97222

Transportation: River City

Rates:

Disposal:

Pricing available for six months unless changes in material or rate change with 30 day notice

****Non-prevailing – no environmental fees - no fuel charges****

Terms and Conditions: *I represent for my company that the above material is accurate and accept the rates for disposal, time and materials as listed. I for my company to agree to pay any surcharges, fines or testing if there are non-represented materials that puts Patriot Environmental Services at risk for treatment, discharge, surcharges or fines to the City of Portland or any other governmental agency. I agree to the acceptance of terms as listed in our Profile and Terms per the customer credit agreement.*

Accepted by:

Signature	Printed Name	Date	Title

Approved by:

<i>Devon Anderson</i>	Devon Anderson	12/29/2025	Facility manager
Signature	Printed Name	Date	Title

Email: Devon.anderson@patriotenv.com

Phone: (503) 261-9800

Cell: (971) 806-6686

Fax: (503) 261-9900

Attachment D

Photography Log



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Photographs

Project Name: The Pickle Factory
Project Number: M1148.01.001
Location: 866 North Columbia Boulevard, Portland, Oregon

Photo No. 1.

Description

Quench Tank located in the southeast corner of the Property.



Photo No. 2.

Description

Inside the Quench Tank, on March 20, 2026. Note all slag material has been disposed.

