

Oregon DEQ Contained-In Determination Approval Signoff Sheet

Site Name: Irwin Hodson Site (ECSI #6399)

Location: 2828-2838 SE 9th Avenue, Portland, Oregon 97202

Media: Soil cuttings investigation-derived waste generated during the installation of soil vapor extraction monitoring well.

Approved Disposal Location: Transported offsite and appropriately dispose via WasteXpress at a permitted Subtitle D landfill or Subtitle D equivalent landfill

Signatures:

Cleanup project manager:

James Orr

Date: April 22, 2026

Hazardous Waste Program staff:

[Signature]

Date: April 22, 2026

Hazardous Waste or Solid Waste Program manager:

Audrey O'Brien

Date: 04/24/2026

DEQ Cleanup Program manager:

Amanda Wozab

Date: April, 24, 2026

State of Oregon
Department of Environmental Quality

Memorandum

To: Irwin Hodson Property, ECSI #6399 **Date:** 04/22/2026

From: Jim Orr, Project Manager, Northwest Region Cleanup Program

Through: Zeb Bates, HW Inspector, Northwest Region HW Program

Approved: Audrey O'Brien, Manager, Northwest Region HW Program
Amanda Wozab, Manager, Northwest Region Cleanup Program
No Longer Contained-In Determination

Subject: Soil cuttings investigation-derived waste generated during
the installation of soil vapor extraction monitoring well.
Irwin Hodson Property, 2808-2838 SE 9th Avenue
Portland, Oregon 97202

The Oregon Department of Environmental Quality (DEQ) Northwest Region Environmental Cleanup, Hazardous Waste and Solid Waste Programs have prepared this No Longer Contained-In (NLCI) Determination requested by Evren Northwest Inc. for the Irwin Hodson Property as the environmental consultant. This NLCI Determination applies to one (1) drum of investigation derived waste (IDW) contaminated soil. IDW generated during drilling related to the SVE pilot study contains Resource Conservation and Recovery Act (RCRA) F003 and F005 listed contaminants of concern (COCs). Concentrations of the F003 and F005 listed COCs are reliably below established construction and excavation worker risk-based concentrations (RBCs), making the IDW soil eligible for a NLCI Determination.

Background Information

The Irwin Hodson Site (Site) is an industrial property located in an industrial area of SE Portland. Industrial land use of the Site and the surrounding area dates to the early 1900s. Previous operations on and adjacent to the Subject Site include North West Planing Mills Company, a former coal gas facility and the Iron Fireman Manufacturing Company. Irwin Hodson has occupied the site since the mid-1960s, operating a metal sign and printing company out of four warehouse buildings on the property. Irwin Hodson currently shares the buildings with other small light industrial businesses. As part of recent operations, Irwin Hodson has generated spent solvent waste listed as EPA Hazardous Waste Numbers F003 and F005.

This determination is for one 55-gallon drum of soil that was generated in March 2026 during the installation of a monitoring well at the Site. The IDW was generated during drilling activities and is currently stored on-site in a labeled drum. Drummed soil is stored within the on-site area of contamination (AOC).

A representative sample was collected from the drummed IDW soil. Soil analysis was conducted as “totals”, not TCLP. Low levels of TCE were detected in the drum soils. The results of the chemical analysis performed by Friedman & Bruya, Inc. located in Seattle Washington are tabulated below. Only chemicals detected by analysis are shown in the table.

Summary Table. Soil Characterization

Soil Characterization	Concentration in Drummed Soil (mg/Kg)	RBC Construction Worker (Dermal Contact) (mg/Kg)	20x TCLP Limit (Soil) (mg/Kg)
Volatile Organic Constituents			
Trichloroethene	0.37	130	10

No longer Contained-In Determination

A No Longer Contained-In Determination is needed to demonstrate that the soil does not qualify as characteristic hazardous waste, that concentrations of solvent-related chemicals are below protective levels, and exempt from land disposal restrictions. To demonstrate that the soil “no longer contains” hazardous waste, the following conditions need to be met:

1. The soil (a solid) must not exhibit a characteristic of hazardous waste (must not be reactive or toxic). The potential for soil containing waste to exhibit toxicity characteristics is evaluated by comparing constituent concentrations in leachate extracted from the waste using the Toxicity Characteristic Leaching Procedure (TCLP) with the limits specified in 40 CFR Part 261.24. Representative (total) chemical concentrations for the soil are compared to a value of 20 times the TCLP limit (to account for the 20 to 1 dilution inherent in the TCLP analysis method) to determine if the limits could potentially be exceeded. If the TCLP limit for any chemical is exceeded 20 times, the waste may be a characteristic waste.

The 20 times TCLP limit for TCE is 14 parts per million or 14,000 parts per billion. The soil does not fail the toxicity characteristic for TCE. The soil is not a characteristic hazardous waste.

2. The soil must not exhibit a characteristic of a hazardous waste (must not be ignitable or corrosive).

Based on knowledge of the process, DEQ has determined that the soil is neither ignitable nor corrosive.

3. Concentrations of hazardous constituents from listed waste must be below health-based levels. Currently, it is DEQ policy that if soil is to be taken to a solid waste permitted Subtitle D lined landfill, then concentrations of hazardous constituents should be below the DEQ Construction Worker Risk Based Concentration for direct contact.

The RBC for TCE is 130 mg/kg. The concentrations of TCE detected in the soil are well below the RBC for direct contact with construction workers.

4. RCRA land disposal restrictions do not apply because the waste was not removed from the area of contamination prior to this determination.

The table above illustrates the sample results compared to the applicable DEQ RBCs and Totals.

Underlying constituents of TCE might be present in the soil at concentrations below the Minimum Reporting Levels (MRL) shown in the laboratory analytical data. Using the MRL concentrations and knowledge of the process, we can determine the following about the soil :

- It would not be ignitable, corrosive, or reactive.
- Concentrations of underlying constituents would be below toxicity characteristic levels.
- Concentrations of underlying constituents would be below DEQ protective levels.

Based on our review of the data and the above findings, DEQ has determined that the IDW soil (one drum) generated during drilling and sampling activities meet the criteria for no longer containing listed hazardous waste.

The concentrations of detected solvents in soil samples are below the DEQ's Construction and Excavation and Construction Worker RBCs, respectively. The soil does not pose an unacceptable risk to industrial workers' exposure under the proposed waste management scenario. If this soil is disposed of at a permitted Subtitle D lined landfill that DEQ has approved for this purpose. The waste will be considered No Longer Contained In Waste. If the IDW is not managed following these conditions of approval, this NLCI Determination does not apply, the waste remains hazardous waste, and must be managed or disposed of in compliance with applicable hazardous waste requirements.