



# Oregon

John A. Kitzhaber, MD, Governor

## Department of Environmental Quality

Northwest Region Portland Office

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April 16, 2012

Mr. Dwight Leisle  
Port of Portland  
P.O. Box 3529  
Portland, Oregon 97208

Ms. Linda Scheffler  
City of Portland BES  
1120 SW Fifth Ave., Room 100  
Portland, Oregon 97204-1912

Re: No Further Action  
Terminal 1 North  
2500 NW Front Ave., Portland, Oregon  
ECSI #3377

Dear Mr. Leisle and Ms. Scheffler:

The Oregon Department of Environmental Quality (DEQ) reviewed the following documents for the Terminal 1 North (T1N) site:

- *Preliminary Assessment*, Port of Portland, September 18, 2000;
- *Remedial Investigation (RI) Report*, Ash Creek Associates, Inc. and NewFields, September 2005;
- *Remedial Investigation Addendum*, Ash Creek Associates, Inc. and NewFields, July 2006;
- *Stormwater System Cleanout Report*, Ash Creek Associates, Inc. and NewFields, September 2008; and
- *Stormwater Source Control Evaluation Report, Terminal 1 North OUI*, City of Portland BES, July, 2011.

The DEQ requested that the Port of Portland (Port) evaluate the subject site's potential impact to the Willamette River as part of upland investigations in Portland Harbor. The City of Portland (City) purchased Operable Unit 1 from the Port in 2004 and completed the site evaluation. Operable Unit 2 is currently owned by Emerson Hardwoods. The subject property, including Operable Units 1 and 2, is shown on Figures 1 and 2.

The DEQ determined that no further action is required to address environmental contamination at the T1N site. This determination is based on the regulations and facts as we now understand them, including but not limited to the following:

1. The 18.6-acre facility is located on the southwest shore of the Willamette River between river miles 10.5 and 10.7 within the Portland Harbor study area. The facility was initially developed for industrial use by Eastern and Western Lumber Company in 1903 and was used as a sawmill and planing mill, for staging of lumber, paper products, steel and grain, and for importing lubricating oil, coal, iron, steel, mercury, tinsplate, and paint. The Port acquired the property in 1971 as a result of its merger with the City Commission of Public Docks, which had purchased the property in 1946 from Eastern and Western. The City began leasing Operable Unit 1 of the facility from the Port in 2002 and purchased it in 2004 to construct the West Side Big Pipe project and manufacture concrete pipe segments. Operable Unit 2 was sold to Emerson Hardwoods in 2004. Current and reasonably anticipated future use of the facility is industrial.
2. Two underground storage tanks (USTs) were decommissioned on site. A 675-gallon heating oil UST located immediately adjacent to the southeast side of Warehouse No. 101 was removed in December 1997 along with 166 tons of petroleum-contaminated soil; DEQ issued a no further action determination on March 19, 1998. A 680-gallon heating oil UST located north of Warehouse No. 103 was removed in December 1997. The UST was in good condition, there was no evidence of leakage, and petroleum hydrocarbons were not detected in confirmation samples from the excavation; DEQ closure was not pursued. There are no operational USTs currently on site.
3. The facility does not currently generate or manage hazardous waste. There have been no significant hazardous substances releases reported at the facility.
4. No significant soil or groundwater contamination was detected during the RI. Based on past and current site activities, six to eight rounds of groundwater samples were analyzed for metals, volatile and semi-volatile organic chemicals, and total petroleum hydrocarbons, and soil samples (98 samples from 41 locations) were additionally analyzed for polychlorinated biphenyls (PCBs). Data from ten on-site groundwater monitoring wells (Figure 2) showed groundwater flow towards the northeast (i.e., the river) and no significant contamination. Stormwater pipelines do not appear to be at a depth that would intercept the water table and provide a preferential migration pathway.
5. Since the site is paved, stormwater contaminants are likely from incidental site activities rather than erodible contaminated soil. Catch basin and storm line solids were removed by the Port in May 2008 and disposed off site. Approximately 5.2 tons of dry solids were removed from catch basins and trench drains. Approximately 130 pounds of solids were removed by water-jetting. Concentrations of removed sediment of cadmium, lead, zinc, and polycyclic aromatic hydrocarbons (PAHs) were elevated relative to "typical" industrial stormwater sediment for Portland Harbor sites (DEQ Guidance for Evaluating the Stormwater Pathway at Upland Sites, Appendix E, October 2010). These contaminants are indicative of past site activities, but do not necessarily represent what migrated to the river since the sediment settled in the conveyance system. Its removal eliminates the in-pipe accumulation of sediment and the future potential for its migration to the river.

6. Post-source control measures (SCMs) stormwater monitoring was conducted by the City to evaluate the effectiveness of the SCMs and to evaluate if significant stormwater contamination was migrating off site into the Willamette River. Detected concentrations were not elevated relative to "typical" industrial stormwater and sediment for Portland Harbor sites. Therefore, stormwater analytical results indicate that SCMs and stormwater best management practices (BMPs) have effectively brought concentrations to acceptable levels.
7. There is not a sediment area of potential concern (AOPC) identified by the Portland Harbor Superfund project adjacent to the TIN facility. Twelve in-river surface sediment samples from the Lower Willamette Group's 2010 Portland Harbor Remedial Investigation in the vicinity of the facility were evaluated. Contaminant concentrations in surface sediment adjacent to the site are not significantly elevated relative to background concentrations being considered for the Portland Harbor site, indicating that the site is not a significant contaminant source to the Willamette River.
8. The DEQ's March 26, 2012 Portland Harbor Source Control Decision for TIN concluded that:
  - The site is adequately characterized.
  - The upland site does not appear to be a current or reasonably likely future source of Willamette River water or sediment contamination.

DEQ concludes that based on the information presented to date, the TIN site (including Operable Units 1 and 2) is currently protective of public health and the environment and does not appear to be a current source of contamination to the river. Therefore, no further action is required under the Oregon Environmental Cleanup Law, ORS 465.200 et seq., unless new or previously undisclosed information becomes available. We will update the Environmental Cleanup Site Information System (ECSI) database to reflect this decision.

Please call me at 503-229-5326 if you have any questions.

Sincerely,

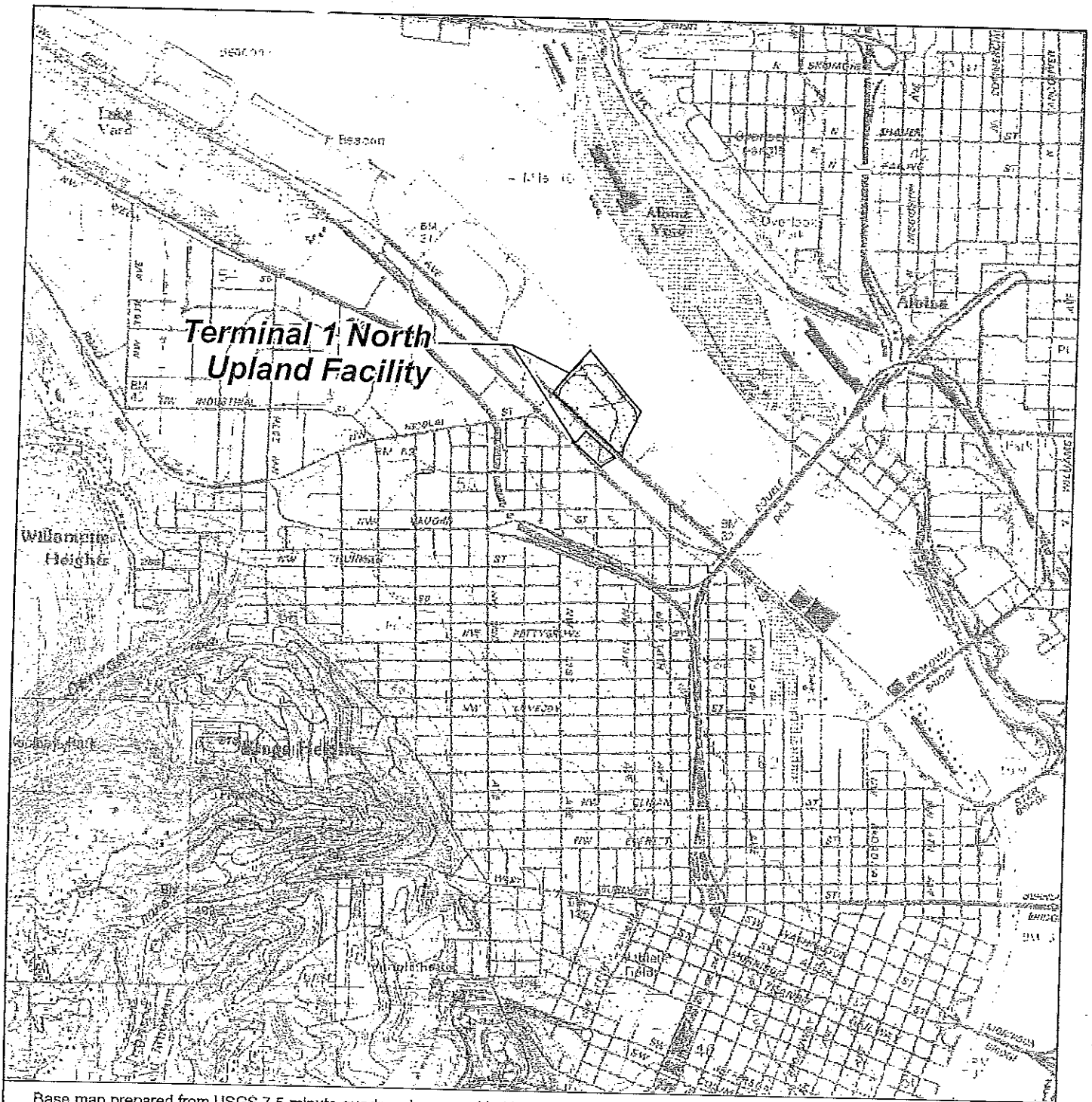


Tom Gainer, P.E.  
Project Manager  
Portland Harbor Section

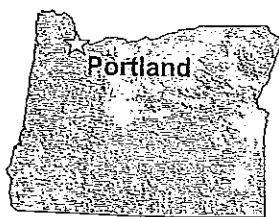
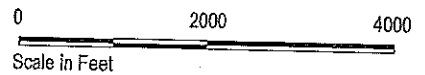
Attachments: Figures 1 and 2

cc: Jim Anderson, DEQ/NWR  
Rich Muza, EPA

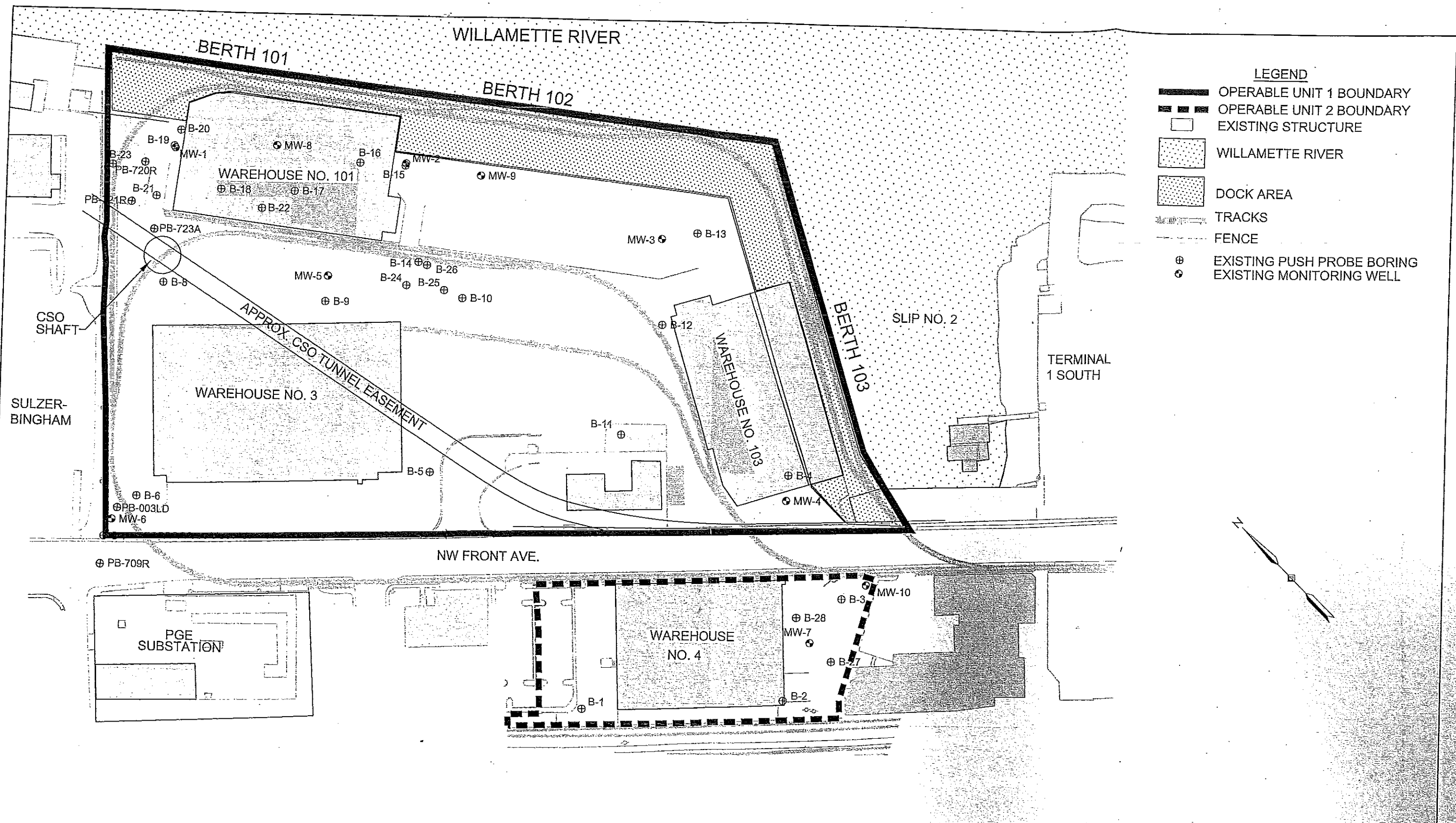




Base map prepared from USGS 7.5-minute quadrangle as provided by Topozone. (1990)



<h3>Vicinity Map</h3> <p>Terminal 1 North Upland Facility Remedial Investigation Port of Portland Portland, Oregon</p>			
 Ash Creek Associates, Inc. <small>Environmental and Geotechnical Consultants</small>	Project Number	1054-00	Figure <b>I</b>
	July 2006		



- LEGEND**
- OPERABLE UNIT 1 BOUNDARY
  - OPERABLE UNIT 2 BOUNDARY
  - EXISTING STRUCTURE
  - WILLAMETTE RIVER
  - DOCK AREA
  - TRACKS
  - FENCE
  - EXISTING PUSH PROBE BORING
  - EXISTING MONITORING WELL



**Facility Plan**  
Terminal 1 North Upland Facility Remedial Investigation  
Port of Portland  
Portland, Oregon

	Project Number 1054-00	Figure 2
Environmental and Geotechnical Consultants	July 2006	

Source: Base map provided by the Port of Portland.