



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue  
Seattle, WA 98101

April 22, 2004

Reply To Attn Of: ECL-116

Chuck Harman  
Oregon Department of Environmental Quality  
Land Quality Division  
Site Assessment Specialist  
2020 SW 4<sup>th</sup> Ave., Suite 400  
Portland, Oregon 97201-4987

**Re: Completion of EPA's Removal Action at the Columbia American Plating Site,  
Portland, Oregon.**

Dear Mr. Chuck Harman,

The United States Environmental Protection Agency, Region 10 (EPA) concluded its Time-Critical Removal Action at the Columbia American Plating Facility located at 3003 NW 35<sup>th</sup> Avenue in Portland, Oregon on March 4, 2004.

On Thursday May 15, 2003 Oregon Department of Environmental Quality's (DEQ) Emergency Response Program contacted and requested EPA's Emergency Cleanup Unit (ECL) for assistance in evaluating and mitigating the imminent threat to human health and the environment posed by the Columbia American Plating Facility (hereafter referred to as the "Site"). EPA was asked by DEQ's Emergency Response Section to stabilize the site and initiate a removal action if the determination was made that: 1) the Site presented an immediate risk to public health or welfare or the environment; and 2) the responsible party was incapable of responding in a timely manner to the actual and threatened releases of hazardous substances from the Site. EPA determined that an Emergency Response (ER) and Removal Action (RA) were appropriate and began its time-critical ER on Friday May 16, 2003.

Initial ER site activities were directed at securing and stabilizing the Site through the management and control of on site water accumulation and the covering of open containers exposed to the environment. Further assessment of Site conditions and hazard categorization identified the following RA objectives:

1. Continued management and control of on site water accumulation
2. Removal and off-site disposal of all drums and containers containing hazardous substances

3. Removal and off-site disposal of contaminated debris
4. Thorough subsurface sampling to determine extent and release of hazardous substances

EPA has met the above objectives and has removed the imminent and substantial endangerment to human health and the environment at this site: a total of 77,507 gallons of hazardous liquids and approximately 500 cubic yards of hazardous waste located in tanks, drums, containers, sumps, and secondary containment systems have been removed from the Site for proper treatment and disposal.

A subsurface investigation was also completed on site. The objective of the subsurface investigation was to determine degree and extent of subsurface contamination. Complete subsurface analytical data packages have been forwarded on to EPA's Site Assessment Clean Up Unit as well as DEQ's Land Quality Division (Joanne Labaw, EPA Superfund Site Assessment Manager and Chuck Harman, Site Assessment Specialist ODEQ, respectively). Results indicate that while soils may have been impacted by the chemicals used in the plating process, most contaminant concentrations detected in soil were below EPA Region 9 Preliminary Remediation Goals (PRG's) for an industrial setting (EPA Reference concentration PRG's can be found at <http://www.epa.gov/region09/waste/sfund/prg/index.htm>) and Oregon's Maximum Allowable Soil Concentrations (MASC) (Appendix 1 of DEQ's Hazardous Substance and Remedial Actions Rules at <http://www.deq.state.or.us/wmc/documents/340-122-0045Appendix1.pdf>) for elements found in industrial soils.

To meet the subsurface investigation objectives 33 boreholes were drilled on and around the site. The EPA collected soil samples at 5 foot intervals and one water sample from each boring. Arsenic was detected in eighteen of the soil samples at concentrations above industrial soil PRG's. Three soil samples contained arsenic at concentrations exceeding the Oregon MASC's however, the detected concentrations were consistent with naturally occurring arsenic levels in area soils. The concentration of chromium in two samples also exceeded the industrial soil PRG. SVOC's and VOC's were detected in some of the soil samples. Only one sample contained an SVOC at a concentration exceeding the industrial soil PRG. This sample contained benzo(a)pyrene at a concentration of 563 ug/kg; the PRG for this compound is 210 ug/kg.

Cyanide was detected in seven groundwater samples at concentrations exceeding the PRG for cyanide in tap water. Arsenic and lead were also detected in groundwater samples at concentrations exceeding both PRG's and Oregon Groundwater Reference Concentrations. Cadmium was detected in two groundwater samples at levels exceeding the Oregon Groundwater Reference Concentration. A total of thirteen groundwater samples contained SVOCs and VOCs at levels exceeding PRGs and Oregon Groundwater Reference Concentration. The most common SVOC detected in groundwater samples was bis(2-ethylhexyl)phthalate which might be attributed to either laboratory or field sampling cross-contamination. The VOC 1,1,2,2-tetrachloroethene was detected in some of the site groundwater samples at levels exceeding the PRG for this compound in tap water; however, this constituent was also present in groundwater from the background borehole sample collected at BH-20. Trichloroethene and tetrachloroethene also were detected in a number of groundwater samples at concentrations exceeding the PRGs for these compounds in tap water and the Oregon Groundwater Reference

Concentrations. These compounds also were detected in the groundwater samples collected from locations within the Building Area and downgradient of the Building Area, but were not detected in the background borehole location, BH-32. The data seem to support an on-site source of trichloroethene and tetrachloroethene. In the past, a vapor degreasing system, which utilized trichloroethylene, was utilized at the CAP facility. It is conceivable that the chlorinated ethenes detected in groundwater are a result of a past release of the degreasing solution.

EPA has also shown through surface water sample analysis that the removal actions conducted on site have reduced surface water contaminant levels. More specifically contaminant levels have been reduced and fall well below the facility's existing Wastewater Discharge permit. The majority of contaminants also fall below EPA tap water PRG's and or DEQ's reference concentrations: (<http://www.deq.state.or.us/wmc/documents/340-122-0045Appendix1.pdf> and DEQ reference column titled "Fresh Acute Criteria" found at <http://www.deq.state.or.us/wq/wqrules/340Div41Tb120.pdf>). The only exception to this would be Cadmium and Chromium which are 2 and 3 times their respective tap water PRG reference values respectively.

EPA demobilized from the Site on March 4, 2004. All operations and maintenance (O&M) activities at the Site ended at this time. O&M activities consisted of the following: 1) management and treatment of onsite water accumulation at two storm water catchment basins and 2) maintenance of site security i.e. locked gates.

EPA believes it has met the objectives stated in the Action Memorandum and will no longer expend federal removal funds at the Site.

EPA would like to bring to your attention other public safety issues that exist on site that do not fall under the authority of the EPA but are still of concern. They include the following: current and future zoning, two storm water catch basins on site and an unsecure facility. The property is currently zoned heavy industrial. In light of subsurface soil and groundwater contamination the EPA would request that DEQ determine the appropriateness of and work with the owner to place restrictions on the use of the property to keep it industrial and/or notify the appropriate office in the City of Portland handling zoning issues to inform them that this property should not be rezoned or given a variance unless additional cleanup or assessment appropriate for a new intended use is conducted. Additionally, DEQ should require appropriate handling and disposal procedures should any future excavation activities take place on site.

The two catch basins were plugged by the owner of the property prior to EPA's involvement on site. Unmanaged one catch basin tends to collect accumulated water, the other is so deteriorated that surficial water passes through cracks in the basin to the subsurface. Site security and theft is also of concern. The Site appears to be attracting scrappers and transient individuals that are taxing local police. EPA would like to encourage DEQ to consult with the current owner, surrounding businesses, local law enforcement as well as the City of Portland's Bureau of Environmental Services in order to address these issues.

If you have any questions regarding these issues, please contact me at (503) 326-2917.

Sincerely,

Marc Callaghan  
On-Scene Coordinator  
Office of Environmental Cleanup

cc: Lori Cora, EPA Office of Regional Counsel  
Joanne Labaw, EPA Site Assessment Manager  
Ann Levine, Acting Program Manager ODEQ Cleanup Section  
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Chris Field, EPA Removal Manager  
Chuck Donaldson, ODEQ Removal Manager  
Administrative Record File