U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Pier 99 - Portland - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: **POLREP #1**
Initial
Pier 99 - Portland

Portland, OR
Latitude: 45.6063108 Longitude: -122.6825854

To:
From: Angie Zavala, OSC
Date: 9/10/2013
Reporting Period: 9/9/13 to 9/10/13

1. Introduction

1.1 Background

Site Number:	10KM	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	8/15/2013
Response Authority:	CERCLA	**Response Type:**	Non-Time-Critical
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	9/9/2013	**Start Date:**	
Demob Date:		**Completion Date:**	
CERCLIS ID:	ORN001002699	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

1.1.2 Site Description

The Site has been the location of boat building, boat repair, and machine shop activities since approximately 1937. At the boat yard, commercial fishing and pleasure boats were repaired and marine transmissions were manufactured. The Oregon Department of Environmental Quality has received numerous pollution complaints alleging that on-Site activities were contaminating the Columbia River and nearby properties. Between September 1991 and June 1999, DEQ received four such Pollution Complaints. Complaints filed include, but are not limited to, allowing oil to drain onto the ground and into the river, improper disposal of paints and solvents, and stripping, sanding, and applying marine paint over the river without containment.

The nearest residence shares the same tax lot as the Site. Other upland residences are located across I-5, about 0.3 mile east-southeast of the Site, and across North Portland Harbor, about 0.4 mile northeast and 0.5 mile north-northwest of the Site. In addition to the upland residences, there are approximately 200 houseboats moored along the north shore of North Portland Harbor, within 0.5 mile of the Site. Nearly 80 percent of these are located either directly across the harbor or downstream from the Site. The nearest is located approximately 525 feet north of the downstream end of the Site.

The entire Site lies within the Columbia River's 100-year flood zone, so flood waters could mobilize any surface contamination at the Site. The distance from the Site source area to surface water (the Columbia River) is approximately 35 feet. The Site is essentially flat with a wall running along the southern boundary of the Site and the northern boundary sloping toward the Columbia River. The majority of the Site is paved; however, the embankment leading to the river, roughly 50 feet high with a greater than 1:1 slope is covered with vegetation and surface soils.

1.1.2.1 Location

The site is at1610 North Pier 99 in Portland, Oregon on the bank of the Columbia River.

1.1.2.2 Description of Threat

The contaminants of concern at the Site include volatile organic compounds (VOCs) (dibutyltin, monobutyltin, tributyltin), semivolatile organic compounds (SVOCs) [bis(2-ethylhexyl)phthalate, benzo(b)fluoranthene, and indeno(1,2,3-cd)pyrene)] chlorinated pesticides (4,4-DDD, 4,4-DDT, heptachlor epoxide), PCBs (Aroclor-1248 and Aroclor-1254), and metals (antimony, arsenic, chromium, copper, lead, mercury). These substances are potential hazardous substances, pollutants, or contaminants as defined by

Sections 101(14) and 101(33) of CERCLA, 42 U.S.C. §§ 9601(14) and (33). Other hazardous substances may also be on-Site.

Data regarding the nature and extent of the contaminants of concern found at the Site are summarized below. A more thorough discussion of the Site investigations and data is found in the project Engineering Evaluation/Cost Analysis (EE/CA) document.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Oregon Department of Environmental Quality (ODEQ) Pollution Complaints

Between September 1991 and June 1999, the Oregon Department of Environmental Quality (ODEQ) received six pollution complaints alleging that ongoing work at the SCBW were contaminating the Columbia River and nearby properties. The nature of each of the complaints and follow-up by ODEQ are as follows:

September 1991: ODEQ received a complaint that SCBW was improperly disposing of waste chemicals. A visit to the property by ODEQ staff revealed that paint thinner wastes were improperly placed in a dumpster for disposal. ODEQ personnel advised SCBW personnel to discontinue this practice.

October 1992: ODEQ received a complaint alleging that SCBW was pressure washing and stripping cuprous oxide-containing paint from a boat hull directly into the Columbia River. A second complaint received in October 1992 alleged that primer paint and putter being sanded from the hull of a boat was being discharged directly to the Columbia River; however, SCBW claimed the paint primer contained no toxic products once dry. These complaints resulted in SCBW receiving two Notices of Non-Compliance for discharging waste to the river.

June 1999: ODEQ received a complaint alleging that SCBW was spray-painting boat hulls outdoors without a spray booth. The owner of SCBW indicated painting activities only involved a few boats and would likely not happen again. No enforcement action was taken regarding this complaint.

April 2002: ODEQ received two complaints from Mermaid Marine, Inc. that SCBW had left behind sufficient wastes to hinder further use of the Site. Fiberglass dust was alleged to cover much of the Site, the river bank was alleged to be littered with painting debris and old hull paint wastes, and crankcase oil from a site crane was alleged to have been drained directly into the river embankment. Oil-saturated soils along the embankment were alleged to be producing an active petroleum seep to the river, site sewage and storm water were alleged to drain directly into the river. The Site was forwarded to the ODEQ Site Assessment Section for resolution.

2003 Expanded Preliminary Assessment

In 2003, Mr. Brown, at the request of ODEQ, conducted an Expanded Preliminary Assessment (XPA). During the XPA, petroleum and lead contamination were encountered near a crane located on-Site. These findings appeared to verify previous reports that during oil changes of the crane crank case, the oil was allowed to drain onto the ground and run down the embankment into the river. Based on the findings of the XPA, an excavation of contaminated soil was recommended and conducted. Approximately 21.5 cubic yards of contaminated soil were removed from the area immediately surrounding the crane. After the soil excavation, three samples were collected from the bottom of the excavation. These samples, taken from roughly 7 feet below ground surface, were still contaminated with total petroleum hydrocarbons and lead but at concentrations below the Site-specific risk-based concentrations (RBCs), which were calculated by ODEQ.

2007 EPA Site Investigation

In July 2007, ODEQ referred the Site to EPA for further investigation under the federal Superfund program. In 2009, the EPA Site Assessment Program completed a Site Inspection (SI) for the Site. Surface soil samples were collected from the upland area beneath the crane, the waste storage area, the embankment, and the Columbia River. The samples were submitted to an analytical laboratory and tested for a comprehensive list of contaminants of potential concern including SVOCs, VOCs, Target Analyte List (TAL) metals, pesticides/ polychlorinated biphenyls (PCBs), and organotins. Soil sample results have been compared to Oregon RBCs and EPA regional soil screening levels for soil ingestion, dermal contact, and inhalation and soil samples were also compared to Oregon sediment bioaccumulation screening level. Sample results for the SI investigation are provided in Tables 1 through 3 in the EECA document. The surface soil sample results indicate that organotins (dibutyltin, monobutyltin, and tributyltin), pesticides (4,4-DDD and heptachlor epoxide), PCBs (Aroclor-1248 and Aroclor-1254) and TAL metals (antimony, arsenic, chromium, copper, and lead) were detected at concentrations that exceeded regulatory criteria. Based on the findings in the report, further action under CERCLA was recommended. The Site was then referred to the EPA Superfund Removal Program for evaluation.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

9/9/2013

Mobilization to the site.

A Kickoff meeting that included safety concerns and recomendations was conducted before stating the work.

Work at Pier 99 site consisted primarily of grubbing/brush removal. Terra Hydr was hired to conduct the grubbing. Grubbing work started in the area east of the shop building, and west of the Interstate Bridge utilizing four workers using weed-eaters. In the afternoon grubbing occurred in the area just below the shop building. Terra Hydr has utilized weed-cutters and a small excavator for vegetation removal.

A fuel tank was discovered on the slope below the shop building. It was covered in plastic sheeting. The tank has an approximate 35 gallon capacity. A PID was used to check for VOC's, none were detected. The tank will be disposed off toward the end of the removal.

9/10/2013
Continue to remove vegetation along the bank.
All 5 concrete slabs from the bank area were removed with an excavator and the eastern staircase was removed as well to stop people from entering the exclusion zone.
The surveyor came back to the site to mark the high water line. He was on site sometime before the removal started and marked a line which accuracy was questionable and had to come back to the site to make it clear.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)
A PRP has been identified and is conducting removal action under the oversight of the United States Environmental Protection Agency and in accordance with an Administrative Settlement Agreement and Order on Consent pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The PRP has contracted Apex Companies, LLC. to design and implement the removal activities.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities
Continue working on the bank stabilization, remove gravel filter, clean and remove discharge line.

2.2.1.1 Planned Response Activities
Continuation of vegetation removal from the bank and placement of jute matting and seeding of the bank. The gravel filter area and discharge/outfall from the filter will be removed as outlined in the work plan and collection of confirmation sampling in the gravel filter area.

2.2.1.2 Next Steps
Continuation of vegetation removal from the bank.

2.2.2 Issues
Questions were raised regarding the validity of the survey work that was conducted by the RP contractor. The surveyor was contacted, the survey was conducted again.

The PRP expressed interest in removing vegetation below the ordinary high water line (17.6' NGVD). Apex Companies, LLC., the PRP's contracted consultant contacted the Multnomah County Drainage District (MCDD) for approval for removal activities. MCDD agreed to vegetation removal below the ordinary high water line, but specified that no trees, or soil were to be removed.

2.3 Logistics Section
No information available at this time.

2.4 Finance Section
No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

Ian Maguire (Apex)

2.5.2 Liaison Officer

N/A

2.5.3 Information Officer

N/A

3. Participating Entities
No information available at this time.

4. Personnel On Site
Apex Companies LLC. 2
Terra Hydr Inc. 6
E&E, Inc START 1

EPA 1

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.