



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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Portland, OR 97232

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TTY 711

October 11, 2021

Dave Johnson
Peninsula Iron Works
PO Box 83067
Portland, OR 97283-0067

Re: PCB Areawide – N Bradford St. ROW, Portland, Oregon
ECSI ID# 6480

Dear Mr. Johnson:

The purpose of this letter is to provide Peninsula Iron Works (PIW) with options related to polychlorinated biphenyls (PCBs) soil contamination previously documented on the PIW property located at 6618 N Alta Ave. in Portland, Oregon (hereafter Site). Information obtained by the Oregon Department of Environmental Quality indicates that you are the owner and/or operator of this Site. As an owner and/or operator, you are a potential responsible party for historical and/or ongoing releases of hazardous substances from this Site (Oregon Revised Statute 465.200 et seq.). The PCB soil contamination also extends onto the adjacent property (formerly operated on by the PIW), and along the UPRR tracks located on N Bradford St. between N Baltimore Ave. and N Philadelphia Ave (which may have been used by PIW for historical operations).

DEQ recognizes the work PIW has completed over the years to address stormwater at the Site and prevent contaminated erodible soils from entering into the Willamette River. However, additional work is needed to delineate and potentially cleanup PCB contamination. DEQ has assigned a high priority to this Site for further investigation and remedial action. The basis for this determination is discussed later in this letter. Given the high priority, the following options are available to you:

1. Conduct investigation and remedial action under DEQ's Voluntary Cleanup Program (VCP). With this option, parties obtain regulatory review and DEQ oversight of all remedial action work performed to investigate and cleanup contamination. In the VCP, you pay an initial deposit, typically \$5,000, to cover DEQ's anticipated oversight costs. You will be invoiced if total costs exceed the initial deposit, or reimbursed if total costs are less than the deposit. If you elect to join the VCP, you must send a signed VCP Intent to Participate form to DEQ. Additional information on the VCP and the VCP Intent to Participate form are available at DEQ's web page: <https://go.oregon.gov/xMVpE>.
2. Wait for DEQ to place you under an enforcement order. With this option, DEQ may place you under an enforcement order if you have not entered the VCP within 30 business days or if the complexities of remedial action warrant an enforcement order.

DEQ is also discussing the Site with the U.S. Environmental Protection Agency's Removal Program. DEQ may request EPA perform removal actions in N Bradford St. to address

immediate risks to human health. EPA would seek recovery of costs from appropriate responsible parties.

As mentioned above, DEQ has assigned a high priority to this Site for further action. The information supporting this decision is summarized below:

- Several source control investigations have been performed on and near the Site associated with the Portland Harbor Superfund Site. PCBs were detected in multiple samples collected on the Site, on the adjacent property, and along the rail line at concentrations up to 21.7 milligrams per kilogram (mg/kg) during these investigations.
- The Site is adjacent to Cathedral Park. Community members frequently cross the railroad tracks in the area of contaminated surface soil to access the park. Community members have expressed concerns about exposure to the contamination.
- Documentation provided to DEQ in November 2012 by Creekside Environmental Consulting, LLC on behalf of PIW identified historical materials that are reasonably likely sources of PCBs including machine oils and electrical transformers.

Under Oregon Revised Statutes (ORS) 465.260, DEQ has the authority to recover remedial action costs, which include site assessment activities. Please note, DEQ intends to collect costs incurred to date in addition to oversight costs that will be incurred in the future.

DEQ would like to offer to meet with you to discuss these options if desired. Please notify DEQ of your interest in entering the VCP within the next 30 days. You may contact the Project Manager, Franziska Landes, at 503-229-5538 (or franziska.landes@deq.state.or.us) if you have any questions or comments or would like more information on the VCP.

DEQ looks forward to working with you to cleanup and protect Oregon's environment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin Parrett', with a long horizontal flourish extending to the right.

Kevin Parrett, Manager
Northwest Region Cleanup Program