



Oregon

Kate Brown, Governor

Department of Environmental Quality

Western Region

165 E. 7th Ave., Ste. 100

Eugene, OR 97401

(541) 686-7838

December 6, 2017

Jared Rubin
Eugene Water & Electric Board
4200 Roosevelt Blvd.
Eugene, OR 97402

RE: **Conditional No Further Action Determination**
for EWEB Operations in Eugene, ECSI #3808

Dear Mr. Rubin:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information and the closure report entitled IRAM Closure Report, dated April 28, 2017 and submitted to DEQ on your behalf by Stantec. The EWEB Operations address is 500 E. Fourth Avenue and includes multiple tax lots (See Site Map, attached to this letter).

DEQ has determined remedial action to address environmental contamination at the Eugene Water and Electric Board (EWEB) Operations site is complete, and no further action is required with conditions. This determination is based on the DEQ regulations and the facts as we now understand them including, but not limited to the following:

- The site has been developed as industrial property since 1885, operating as a woolen mill, flour mill, furniture manufacturer, and wood products. EWEB started using the property for utility functions in 1911. A separate cleanup site (LUST 20-12-0026) for a release from the Bunker C storage tank was previously issued No Further Action by DEQ in 2015.
- Areas of concern were identified based on historic land use and evaluated for potential contamination. A Phase I Environmental Site Assessment in 2014 identified a former lumber treatment building, machine shop, petroleum storage tanks, and old utility operations as possible contaminant sources.
- Soil was impacted by historic releases at the site through various industrial and utility operations.
- EWEB completed remedial excavations to remove the contaminated soil from three areas of concern at the site. The areas of concern are the former Credit Union building (arsenic), former Substation A (PCBs) where transformers were stored, and petroleum-contaminated soil found at the southeastern portion of the site. The oil contamination is likely from surface spills during years of industrial operations at the site.
- Contaminated soil was excavated from November 2016 through April 2017. Arsenic was initially detected in soil above the regional background concentration near the former EWEB

Credit Union building. Soil was removed and confirmation samples found arsenic below naturally-occurring levels.

- PCB-contaminated soil was removed and confirmation samples were collected. The remaining concentrations of PCBs were below DEQ's Clean Fill guidance levels and standards for contact by residential receptors in an urban setting.
- Heavy oil contamination was found in soil at three locations in the southern portion of the site. Contaminated soil was excavated until concentrations oil-related were below site-specific risk-based concentrations for Dense Urban Residential receptors.
- All contaminants evaluated were within acceptable risk levels for the likely future land use.
- The site will be under commercial use (restaurants, stores, etc.) and dense multi-family housing in the future based on a special zoning designation from the City of Eugene. The property is part of the Downtown Riverfront development project and will not include single-family residential housing.
- DEQ held an informational meeting at EWEB's headquarters building on June 13, 2017. Members of the public were invited to learn more about the cleanup site from the DEQ project manager and Stantec. Notices were posted on DEQ's website, Oregon Secretary of State's Bulletin, and in the Register-Guard newspaper. Letters were also sent to each adjacent property owner in June 2017. No comments objecting to closure were received.
- DEQ required a conditional NFA due to concentrations of lead, mercury, and oil in shallow soil (0 to 3 feet below grade) across the site. These contaminants are present at levels considered safe for proposed land use, but concentrations are above DEQ's Clean Fill standards. With the exception of the headquarters administrative building, shallow soil removed from the site will need to be managed as a solid waste. A Contaminated Media Management Plan (CMMP) was provided for current or future owners, outlining the necessary actions to take if contaminated soil is encountered. Health and safety recommendations were also included in the plan as a precaution to protect workers from contact with contaminated soil.
- An Easement and Equitable Servitude document was recorded on the property on December 5, 2017. The EES restricts land use (no single family residences) and requires implementation of the CMMP.

Based on the available information, EWEB Operations is currently protective of public health and the environment. The site requires no further action under the Oregon Environmental Cleanup Law, ORS 465.200 et seq. unless new or previously undisclosed information becomes available, or there are changes in site development or land and water uses, or more contamination is discovered. DEQ will update the Environmental Cleanup Site Information System (ECSI) database to reflect this decision.

This letter only applies to the contamination discussed above. If any contaminated soil or groundwater is encountered in the future, it must be handled and disposed of in accordance with local, state and federal regulations, and as provided in the CMMP for this site.

A copy of the staff memo supporting this No Further Action decision can be viewed at <http://www.deq.state.or.us/Webdocs/Forms/Output/FPCController.aspx?SourceIdType=11&SourceId=3808&Screen=Load>. DEQ recommends keeping a copy of all of the documentation

associated with this remedial action with the permanent facility records. If you have any questions, please contact Cathy Brown at 541-687-7325, or email at brown.cathy@deq.state.or.us.

Sincerely,



Donald E. Hanson, RG, Manager
Western Region Cleanup Section

Attachments: Site Map
 Staff Report
 EES w/o Exhibits

cc: ECSI #3808 File (w/o attachments)

ec: Susan Turnblom, DEQ
 Norm Read, RG, DEQ
 Len Farr, Stantec
 Anne Fifield, City of Eugene