



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

JUL 17 2018

OFFICE OF
AIR AND WASTE

Reply to: OAW-150

Mr. Chris Myers
PCC Structural, Large Parts Campus
4600 Southeast Harney Drive
Portland, Oregon 97206

Re: Approval of Change Notification to Self-Implementing Cleanup at the PCC Structural, Area A, Large Parts Campus, TSCA ID No. ORD 00902 7970

Dear Mr. Myers:

This letter is in response to your notice of a change (Change Notice and Technical Memorandum, References 1 and 2, respectively) to the existing self-implementing cleanup approval at the PCC Structural Large Parts Campus, Area A (Reference 3)¹. This Change Notice documented construction-related activities at Area A that are expected to result in the generation and subsequent disposal of soils meeting the definition of PCB remediation waste. These activities are related to excavation of portions of Area A, to accommodate construction of an electrical switchgear building and associated foundation. This work also includes construction of an access road as documented in the Technical Memorandum. Although the construction activities themselves are not intended to result in additional cleanup at Area A, the generation and disposal of soils meeting the definition of PCB remediation waste is subject to the provisions of 40 Code of Federal Regulations (C.F.R.) Part 761.

This letter constitutes approval under the authority of 40 C.F.R. § 761.61(a) for disposal of polychlorinated biphenyl (PCB) remediation wastes at the PCC Structural, Large Parts Campus (PCC) in Portland, Oregon from Area A electrical switchgear construction excavation and the associated construction access road. This approval amends and is in addition to the terms and conditions of the EPA's original approval.

Self-Implementing Cleanup Approval

As stated in 40 C.F.R § 761.61(a) and in the EPA's original approval of self-implementing cleanup (Reference 3), cleanup of Area A must continue to be in accordance with all applicable requirements of 40 C.F.R § 761.61(a)(1) through (9). The EPA understands that PCC intends to remove excess soils with concentrations greater than or equal to 1.0 ppm, and will continue to manage cleanup of Area A as a low-occupancy area, and to maintain land use, institutional and engineering controls accordingly. The checklist provided to you as part of the original approval of self-implementing cleanup remains applicable. As documented in the original approval, you must prepare a cleanup completion summary

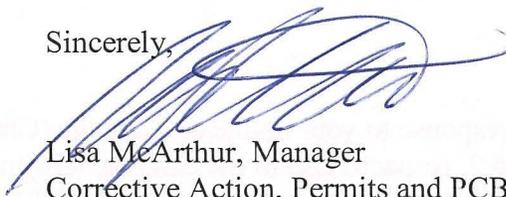
¹ The EPA notes that PCC Structural previously submitted a separate notice of change to the original self-implementing cleanup, one related to Area B East on May 15, 2018, which was approved by the EPA on June 5, 2018. Although the two change notices are for separate areas of the facility, the EPA is noting the previous change notice for completeness.

report that describes how you conducted the cleanup in accordance with the applicable regulatory requirements. You must send a copy of the cleanup completion summary report to the EPA within 60 days after certificates of disposal are received and final verification sample results validation is completed.

The EPA's Office of Land and Emergency Management (OLEM) policy states that all cleanups should be protective of human health and the environment, which extends to the environmental footprint of cleanup activities. Accordingly, the EPA requests that PCC review Section 6 of the ASTM Standard Guide for Greener Cleanups (Active Standard ASTM E2893-16e1) to identify Best Management Practices (BMPs) which may be applicable to the PCC cleanup and implement those practices which PCC identifies as being feasible to implement. The cleanup completion report required by Condition 6 of this approval should include a section on BMP Documentation, as described in Section 6.6.5 of the ASTM Standard.

Should you have any questions or comments, please contact Dave Bartus at (206) 553-2804 or bartus.dave@epa.gov.

Sincerely,



Lisa McArthur, Manager
Corrective Action, Permits and PCB Unit

Enclosures

1. References

cc: Ms. Della Fawcett, RG
Landau Associates

Mr. Paul Seidel
Oregon Department of Environmental Quality, Northwest Region

Enclosure 1
References

1. Notice, "Notice of Change to Supplemental PCB Self-Implementing Notice, PCC Structural, Inc. – Large Parts Campus, Portland, Oregon, Project No. 0883002.040.046," Landau Associates, dated July 9, 2018.
2. Technical Memorandum, "Switchgear Project Excavation Plan PCC Structural, Inc. Large Parts Campus, Portland, Oregon, Project No. 0883002.040.046, Landau Associates to Paul Seidel and Dana Bayuk, Oregon Department of Environmental Quality, dated July 9, 2018
3. Letter, "Self-implementing Cleanup and Risk-based Disposal Approvals for the PCC Structural, Large Parts Campus, TSCA ID NO. ORD 00902 7970," Timothy B. Hamlin, EPA to Chris Meyers, PCC Structural, dated March 29, 2017.

