



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

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OFFICE OF  
AIR AND WASTE

OCT 19 2018

Reply to: OAW-150

Mr. Bryan McCampbell  
PCC Structurals, Large Parts Campus  
4600 Southeast Harney Drive  
Portland, Oregon 97206

Mr. Jay Bower  
Landau Associates  
1500 SW 1st Avenue, Suite 1015  
Portland, Oregon 97201

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

Dear Mr. McCampbell and Mr. Bower:

This letter is in response to your notices of a change (References 1 and 2, respectively) to the existing self-implementing cleanup approval at the PCC Structurals Large Parts Campus, Area A (Reference 3).<sup>1</sup> These change notices document construction-related activities at or near Area A that warrant a change to the scope and substance of the original Notice. Key elements of the two change notices, as well as other changes to cleanup activities in Area A, are outlined below. The U.S. Environmental Protection Agency is also making a minor administrative change to the original cleanup approval for PCC Structurals regarding submission of a project completion report for purposes of integrating work with related cleanup activities established by the Oregon Department of Environmental Quality.

Change Notice dated August 28, 2018

This change notice relates to trenching of soil and concrete and installation of a new catch basin south of the existing switchgear in Area A, known as the Urea Area (Figure 1 in Reference 1). Construction activities include trenching of soil and concrete, and installation of a new catch basin designed to collect water that accumulates near the primary power switchgear. While much of this work will be within the

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<sup>1</sup> The EPA notes that PCC Structurals previously submitted a separate notice of change to the original self-implementing cleanup related to Area A on July 9, 2018 (Reference 4), with the EPA's approval following on July 17, 2018 (Reference 5). This notice addressed switchgear construction activities at or near Area A that resulted in the generation and subsequent disposal of additional soils meeting the definition of PCB remediation waste not addressed in the original Notice.

PCC Structurals also submitted a notice of change to the original self-implementing cleanup related to Area B East on May 15, 2018, which was approved by the EPA on June 5, 2018. This latter notice addressed construction-related activities associated with installation of a new chiller tower foundation that resulted in the generation and subsequent disposal of soils meeting the definition of PCB remediation waste. Although this change notice is for a separate area of the facility, the EPA is noting this previous change notice for completeness.

original boundaries of Area A, the work will slightly expand the boundary of Area A. Because the concrete and shallow soil excavated in the Urea Area is known to contain one concrete and one soil sample with total polychlorinated biphenyl (PCB) concentrations greater than 50 ppm, all removed concrete and soil will be managed in a Subtitle C landfill. Confirmation samples will be taken within the Urea Area to verify compliance with a cleanup standard of 1.0 part per million (ppm).<sup>2</sup>

Change Notice dated September 7, 2018

This Change notice documents two changes to the original Notice for Area A.

The first change relates to the original concrete cloth cap associated with the eastern-most portion of Area A. As documented in an e-mail dated December 8, 2017 (Reference 6), confirmation samples associated with switchgear construction obtained on November 18, 2017 indicated residual PCB concentrations above the low-occupancy cleanup level of 25 ppm. As a result, PCC installed fencing, signage and a cap over the affected portion of Area A, as required by 40 C.F.R. §761.61(a)(4)(B)(3). However, due to access constraints, PCC installed a concrete cloth cap rather than a cap meeting the standards of 40 C.F.R. §761.61(a)(7) and (8). Consistent with its approval of a concrete cloth cap for Area B West in the original PCC cleanup approval (Reference 7), the EPA has determined that the concrete cloth cap is appropriate in this circumstance for the eastern-most portion of Area A, and will provide adequate protection from direct contact, erosion, and infiltration in a manner that ensures remaining PCBs do not pose an unreasonable risk of injury to health and the environment. Therefore, the EPA is providing approval for use of a concrete cloth cap in Area A under the risk-based disposal approval authority of 40 C.F.R. §761.61(c). The EPA notes that the deed notice referenced in Footnote 2 applies to the entirety of Area A, including the eastern-most portion affected by this change.

The second change relates to a modification of PCC's construction plans that will require the cap in the southern portion of the original cap in Area A be changed from a concrete cloth cap to a concrete cap. The area where the concrete cloth cap will be replaced with a concrete cap is shown on Attachment 1 of Reference 1. The concrete cap will be a minimum of 6-inches thick and will meet the requirements for a cap under 40 CFR § 761.61(a)(7). Since this replacement of a portion of the concrete cloth cap with a standard concrete cap satisfies the applicable self-implementing cleanup requirements for low-occupancy areas, the EPA is providing approval of this change under the self-implementing cleanup authority of 40 C.F.R. §761.61(a).

An additional change, reflecting activities following the July 9, 2018 Notice of Change to the Self Implementing Plan (Reference 4), relates to an expansion of the scope of cleanup within Area A to encompass additional contamination identified as part of construction of a new switchgear foundation. As described in the July 9, 2018, confirmation soil samples were collected from the upper and lower switchgear construction foundation areas prior to excavation activities, and confirmation samples from the slope between the foundation areas were collected following removal of the first 1.5-foot of soil from the slope. Total PCBs were present in soil at concentrations greater than the cleanup criteria of 1.0 ppm in the initial confirmation samples collected from the slope. Based on these results, an additional

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<sup>2</sup> As documented in EPA's original cleanup approval for Area A dated March 17, 2017 (Reference 7), EPA accepted PCC's analysis that Area A meets the definition of a low-occupancy area. Although portions of Area A have been cleaned up to a 1.0 ppm level, consistent with unrestricted use in high-occupancy levels, Area A remains a low-occupancy area. As documented in PCC's September 7, 2018 change notice, the capped area in Area A will meet the requirements for deed restrictions, fencing and signage under 40 C.F.R. § 761.61(a)(8). Area A was previously identified in a deed restriction filed with Multnomah County ("Notice of Matter Affecting Title to Real Property" recorded June 15, 2018, Document 2018-063257).

foot of soil was removed from the slope area, which was the deepest that the excavation could be extended in this area without compromising existing electrical utility conduits, and additional confirmation samples were collected. Total PCB results representing soil remaining in place were less than 25 ppm, but above 1.0 ppm. Due to the presence of soil with concentrations of total PCBs remaining in place above 1.0 ppm, the original concrete cloth cap will be extended west and north from the small portion of Area A where the concrete cloth cap was originally placed to fully cover areas where PCBs remain in place above levels requiring a cap. The EPA is providing approval for this change under the authority of 40 C.F.R. 761.61(c).

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

#### Project Completion Report Submission Requirements

The original cleanup approval issued to PCC Structurals (Reference 7), included Condition 6, which applies to cleanup of Area B West, and which requires submission of a project completion report within 60 days of completion of field work. As discussed in the original cleanup approval statement of basis, the Oregon Department of Environmental Quality (ODEQ) is separately overseeing related cleanup work at the facility. One of these ODEQ requirements is submission of a catch basin monitoring report following submission of the TSCA project completion report. For purposes of better integrating ODEQ cleanup work with approvals for cleanup of Areas A and B West, the EPA is clarifying that PCC Structurals may submit the ODEQ-required catch basin monitoring report in advance of the project completion report.

#### 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) except for cap requirements applicable to portions of Area A covered with a concrete cloth cap separately approved under the authority of 40 C.F.R. § 761.61(c). PCC must continue to manage cleanup of Area A, including the additional scope as approved via the current change notice approvals, 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 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 completion of field work.

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,

Tim Hamlin  
Director

## Director

Enclosure

cc: Ms. Collette Gaona  
Landau Associates

Mr. Paul Seidel

Oregon Department of Environmental Quality, Northwest Region

**Enclosure 1**  
**References**

1. Notice of Change to Supplemental PCB Self-Implementing Notice PCC Structurals, Inc. Large Parts Campus – Area A Urea Area, Portland, Oregon, Project No. 0883002.040.046, Colette Gaona and Jay Bower, Landau Associates to Lisa McArthur, EPA Region 10, dated August 28, 2018.
2. Notice of Change to Supplemental PCB Self-Implementing Notice, PCC Structurals, Inc. Large Parts Campus – Area A, Portland, Oregon, Project No. 0883002.040.046, Colette Gaona and Jay Bower, Landau Associates to Lisa McArthur, EPA Region 10, dated September 7, 2018.
3. Letter, “Self-implementing Cleanup and Risk-based Disposal Approvals for the PCC Structurals, Large Parts Campus, TSCA ID NO. ORD 00902 7970,” Timothy B. Hamlin, EPA to Chris Meyers, PCC Structurals, dated March 29, 2017.
4. Letter, “Notice of Change to Supplemental PCB Self-Implementing Notice, PCC Structurals, Inc. Large Parts Campus – Area A, Portland, Oregon,” Della Fawcett and Jay Bower, Landau Associates to Lisa McArthur, EPA, Region 10, dated July 9, 2018.
5. Letter, “Approval of Change Notification to Self-Implementing Cleanup at the PCC Structurals, Area A, Large Parts Campus, TSCA ID No. ORD 00902 7970,” Lisa McArthur, EPA to Chris Meyers, PCC Structurals, dated July 17, 2018.
6. E-mail, RE: PCC LPC Self-Implementing PCB Cleanup Update,” Collette Gaona, Landau Associates to Paul Seidel, ODEQ and Dave Bartus, EPA, dated December 8, 2017.
7. Letter, “Self-implementing Cleanup and Risk-based Disposal Approvals for the PCC Structurals Large Parts Campus, TSCA ID No. ORD 00902 7970,” Timothy B. Hamlin, EPA to Chris Meyers, PCC, dated March 29, 2017.

