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Forest Lane

HAHN AND ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS

August 28, 2003

Ms. Barbara Priest
Oregon Department of Environmental Quality
811 SW 6th Avenue
Portland, Oregon 97204-1390

HAI Project No. 6235

SUBJECT: Class V UIC Pre-Closure Notification
Lakeside Industries – Portland, OR Facility
4850 N.W. Front Avenue, Portland, Oregon

Dear Ms. Priest:

As required by Oregon Administrative Rules (OAR) 340-044-0040(2) Decommissioning and Conversion Requirements for Underground Injection Systems, Lakeside Industries (Lakeside) is providing the Oregon Department of Environmental Quality (DEQ) with 30-days notice of Lakeside's intent to decommission two (2) drywells at the above-referenced facility. Decommissioning is scheduled to begin on September 30, 2003.

The completed DEQ Class V Pre-Closure Notification Form, signed by Mr. Forest Lane, Environmental Manager, Lakeside Industries, is attached to this letter.

In addition, we are including the following supplemental information:

- Pre-Closure Form, Item 7 additional information
- Brief Description of how the dry wells will be closed
- Sampling Plan
- Site Map (attached)
- Nearest Well Log (attached)

1.0 Pre-Closure Form, Item 7 Additional Information

7. Types of material, products and wastes generated: The facility is operated as an asphalt mixing plant. Materials mixed together to create the hot-mix asphalt concrete product include: aggregate, asphalt, and asphalt cement. Diesel fuel is stored in an AST on-site and used in the vehicle fleet. "Soaping" surfactants are stored and applied on-site to coat the inside of the truck boxes to prevent product from sticking to the box. Used oil and used antifreeze are wastes generated on-site. NO hazardous wastes are generated on-site.

434 NW 6th AVENUE, SUITE 203 • PORTLAND, OREGON 97209-3651
503-796-0717 Telephone • 503-227-2209 Facsimile

2.0 Brief Description of How the Dry Wells will be Closed

The dry wells are reported to have been constructed in 1988, and consist of a 4-5' diameter, 4' deep concrete pipe, filled with rock. The tops of the wells are approximately 2-3' below the ground surface. The drywells are likely to be no deeper than approximately 10-15'.

Closure of the two (2) dry wells will include:

- Excavating to the top of the drywells
- Using a vacuum truck to remove any liquid in the system
- Removing sludge built-up in the system
- Filling the drywell with concrete or removing the entire system and backfilling (depending upon conditions encountered)

The sludge, sediment, and native soil beneath the drywells will be sampled, and a worse case sample analyzed for contaminants of concern in order to profile any material for disposal, and to assess the potential for contaminants to be present in the system (See 3.0 Sampling Plan).

An Oregon Registered Geologist will certify the closure.

3.0 Sampling Plan

Lakeside Industries has operated a hot-mix asphalt plant at the subject site since 1987. The subject site is located on the southwest bank of the Willamette River in a heavily industrialized area of Northwest Portland. This stretch of the river is also known as the Portland Harbor, an area designated as a federal Superfund site. In 2001, Lakeside industries responded to a request by the Oregon Department of Environmental Quality (DEQ) to perform a Preliminary Site Assessment (PSA)[1] of the subject property to evaluate the site as a potential contributor of contamination to the sediments in the Portland Harbor. The PSA discussed the presence of two subject dry wells at the facility (See Site Map). As a result of reviewing the PSA, the DEQ has shown an interest in the dry wells.

Lakeside Industries has committed to the DEQ to decommission the two dry wells located at the Lakeside Industries – Portland Facility by early October 2003[2]. The proposed decommissioning is designed to meet DEQ and Oregon Water Resources Department (OWRD) standards for decommissioning such installations.

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[1] Hahn and Associates, Inc. (2001). *Preliminary Site Assessment, Lakeside Industries, 4850 NW Front Avenue, Portland, Oregon.* (HAI Project No. 5366). December 26, 2001.

[2] Lakeside Industries (July 22, 2003). Letter from Lakeside Industries (Mr. Forest Lane) to Oregon Department of Environmental Quality (Ms. Alicia Voss).

One dry well (UIC1) is located at the south-central side of the plant beneath the Reclaimed Asphalt Pavement (RAP) pile. Until April 2003, Catch Basin 1 (CB1), located near the diesel fueling station, discharged through Oil Water Separator 1 (OWS1) and into UIC1. In April 2003, the discharge connection to UIC1 was terminated. The discharge was redirected to the Manhole 1 (M1), which discharges into the City of Portland combined sanitary/stormwater sewer system.

The second dry well (UIC2) is located at the northeast corner of the plant beneath the Aggregate Storage Area (ASA) pile. Until approximately 1995, Catch Basins 2, 3, and 4, (CB2, CB3, and CB4), located outside the Office/Shop Building, and former Catch Basin 5 (CB5), located in the Shop floor, discharged through Oil Water Separator 2 (OWS2) and into UIC2. In approximately 1995, the discharge connection to UIC2 was terminated. The discharges from these catch basins were redirected to the Manhole 1 (M1), which discharges into the City of Portland combined sanitary/stormwater sewer system.

3.1 Proposed Sampling Activities

To determine whether historical usage of the drywells has impacted accumulated sediments likely to be present in the bottom of the drywells, one push probe boring will be installed within each of the two drywells to collect sediment samples throughout the expected sediment column.

Based on the time of year, it is unlikely storm water will be present in the drywells. Therefore, HAI has not included liquids sampling in this scope of work.

Borings will be installed with a truck-mounted hydraulic push probe rig. The push probe will be advanced in 4-foot increments within the dry well until native soils are observed, and until evidence of potential sediment impact is lacking. Continuous soil cores will be obtained during probing. Sediment and soil samples will be collected from the cores at approximate 2- to 3-foot intervals. The sediments will be screened in the field for the presence of contamination by the visual, odor, sheen test, and headspace vapor methods.

The drywells are believed to be approximately no deeper than 10 – 15 feet deep, and more likely shallower than 10 feet below ground surface. Based on previous investigations conducted at the site, groundwater is not expected to be present to depths of at least 20 feet bgs, and is not expected to be encountered during site investigation activities.

3.2 Task 3 – Laboratory Analyses

The uppermost sediment sample from each location will be selected for analysis at a qualified laboratory to characterize the sediments for appropriate disposal. Samples of the underlying soils will be selected based on the field screening results to determine impacts to native soil and characterize the vertical extent of such impacts if present. Based on the history of the site, the potential contaminants of concern (COCs), and discussions with DEQ, the selected sediment samples will be analyzed for:

- Polynuclear Aromatic Hydrocarbons (PAHs) by EPA Method 8270
- Volatile Organic Compounds (VOCs), including halogenated solvents and benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA Method 8260
- Total Petroleum Hydrocarbons (TPH) as diesel or oil by Northwest (NW) Method TPH-Dx
- Total Metals: arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver by EPA Method 6010.

3.3 Data Evaluation

Should laboratory analysis indicate that contaminants of concern (COCs) are not present at concentrations exceeding EPA Preliminary Remedial Goals (PRGs) for direct contact with soils and migration to groundwater, HAI shall oversee and document the proper decommissioning of the drywells in accordance with Oregon Water Resource Department (OWRD) requirements for the decommissioning of "other holes" (OAR 690-240-0030) and the federal prohibition of fluid movement standard (40 CFR 144.12 and 144.82a).

3.4 Report Preparation

Upon completion of the work activities and receipt of the analytical data, a report will be prepared that will contain a description of the work activities, a representation of the distribution of any contamination encountered, and the analytical results. Concentrations of contaminants detected in the samples, if any, will be reported in tabular form. The attachments will include documentation of drywell construction and decommissioning, laboratory analytical reports, and chain-of-custody documentation. The significance of findings of contamination, if any, will be elaborated in the report. In addition, the report will be reviewed and signed by Registered Geologist.

4.0 Site Map

A Site Map is attached to this letter.

5.0 Nearest Well Log

The nearest well log is attached to this letter.

Mr. Forest Lane, Environmental Manager, Lakeside, and the undersigned, are available to answer any questions you may have regarding this 30-day notice of intent to close the two (2) drywells.

Sincerely,

Philip A. Ralston

Philip A. Ralston, C.H.M.M.
Principal

Email: pralston@hahnasoc

C: Mr. Forest Lane, Environmental Manager, Lakeside Industries
Mr. Chuck Gaskill, Manager, Lakeside Industries – Portland, OR Facility

DEQ USE ONLY
Registration #:
File #:
Mail ID #2/#9:
DOC Conf.:
Notes:

DEQ

Oregon Department of Environmental Quality

DEQ USE ONLY
Received:
☐ IND ☐ DOM ☐ UIC:
Notes:

CLASS V PRE CLOSURE NOTIFICATION FORM

1. Facility Legal Name: Red-Samm Mining Co Inc dba Lakeside Industries	2. Common Name: Lakeside Industries
3. Facility Physical Address: 4850 NW Front Ave. City, State, Zip Code: Portland, OR 97210	4. Facility Mailing Address: 4850 NW Front Ave. City, State, Zip Code: Portland, OR 97210
5. Name of Owner/Operator: Lakeside Industries Address: PO Box 7016 City, State, Zip Code: Issaquah, WA 98027	6. Phone Number: (425) 313.2600 Fax Number: (425) 313.2620 e-mail address: forest1@lakesideind.com

7. Legal Contact: Forest Lane, Env. Mgr. Phone Number: (425) 313.2656

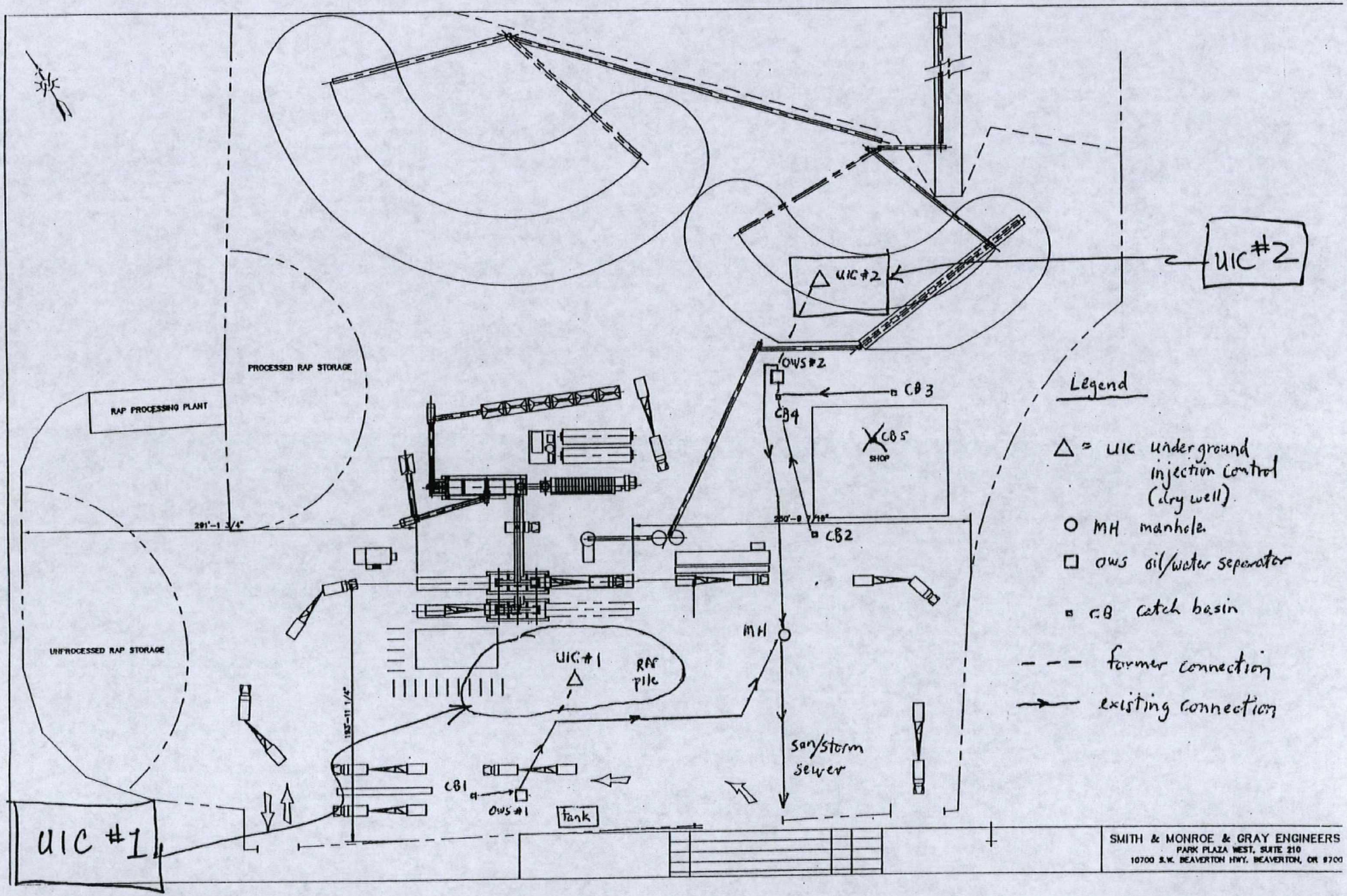
FACILITY DESCRIPTION (ATTACH DOCUMENTS AS NEEDED)

1. Latitude: 45 degrees 33 minutes 28 seconds N Longitude: 122 degrees 43 minutes 45 seconds W
2. Type of UIC System: 5D4 Number of injection systems: 2 (If registered, list UIC number, e.g., 11117-05)
3. Injection/Disposal System Design (check all that apply): Drywells
   ☒ Drywell or sump ☐ Auto floor drain ☐ Cesspool ☐ Sewer drill hole ☐ Septic tank/drainfield/leachfield ☐ Other
4. Year of construction: 1988 Proposed date of injection system closure: Sept. 30, 2003
5. Average flow: N/A gallons/day Not Available.
6. SIC/NAICS Code: 2951 Nature of business at facility: Asphalt mixing plant
7. Types of materials, products and wastes generated: See Attachment
8. Type of closure (check all that apply):
   - ☒ Sample Fluids/sediments
   - ☒ Appropriate disposal of remaining fluids/sediments
   - ☒ Remove contaminated soil
   - ☐ Conversion to other well type
   - ☐ Pump out/fill with rocks and seal
   - ☒ Attach to a municipal system
   - ☒ Clean out
   - ☒ Install permanent plug
   - ☐ Other (describe):
9. Attach a brief description of how the injection system will be closed. ☒ Attached
10. A sampling plan is required for closures of systems serving auto drains, industrial wastewater, large parking lots and large municipalities. ☒ Attached
11. Attach a site map showing UIC location, facility buildings and their use, parking areas, roads and water features. ☒ Attached
12. List any other DEQ or public agency permits applied for or issued to this facility: DEQ: Air Contaminant Discharge Permits AOGP-007.-008.-009. ACOE: Remove-Fill Permit
13. DEQ contact person: Alicia Voss, NW Region-DEQ

SIGNATURE OF LEGALLY AUTHORIZED REPRESENTATIVE (REQUIRED)

I hereby certify that the information contained in this registration is true and correct to the best of my knowledge and belief.

Forest Lane Name of Legally Authorized Representative (type or print)	Environmental Manager Title
Forest Lane Signature of Legally Authorized Representative	28 August 2003 Date


PROCESSED RAP STORAGE
RAP PROCESSING PLANT
UNPROCESSED RAP STORAGE
291'-1 3/4"
103'-11 1/4"
250'-8 7/16"
UIC #2
UIC #2
OWS #2
CB 3
CB4
CB 5
SHOP
CB2
MH
UIC #1
RAP pile
San/Storm Sewer
CB1
OWS #1
Tank
UIC #1
Legend
△ = UIC underground injection control (dry well)
○ MH manhole
□ OWS oil/water separator
▫ CB catch basin
- - - former connection
→ existing connection
SMITH & MONROE & GRAY ENGINEERS
PARK PLAZA WEST, SUITE 210
10700 S.W. BEAVERTON HWY. BEAVERTON, OR 97700

well_image.asp 8/28/03 2:3

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WATER RESOURCES DEPT.
SALEM, OREGON

START CARD # 9987

(1) OWNER:
Name: Chevron USA, Inc.
Address: P. O. Box 4168
City: Portland State: OR Zip: 97208

(2) TYPE OF WORK:
☒ New Well ☐ Deepen ☐ Recondition ☐ Abandon

(3) DRILL METHOD
☒ Rotary Air ☒ Rotary Mud ☐ Cable
☐ Other

(4) PROPOSED USE:
☐ Domestic ☐ Community ☒ Industrial ☐ Irrigation
☐ Thermal ☐ Injection ☐ Other

(5) BORE HOLE CONSTRUCTION:
Special Construction approval Yes ☐ No ☒ Depth of Completed Well 310 ft.
Explosives used Yes ☐ No ☒ Type Amount

BORE Diameter	From	To	SEAL Material	From	To	Amount sacks or pounds
12"	0	81	Cement	0	81	85 sacks 4
8"	81	310				283

How was seal placed: Method ☒ A ☐ B ☒ C ☐ D ☐ E
☐ Other
Backfill placed from ft. to ft. Material
Gravel placed from ft. to ft. Size of gravel

(6) CASING/LINER:

	Diameter	From	To	Gauge	Steel	Plastic	Welded	Threaded
Casing:	8"	41	81	250	☒	☐	☒	☐
					☐	☐	☐	☐
					☐	☐	☐	☐
					☐	☐	☐	☐
Liner:					☐	☐	☐	☐
					☐	☐	☐	☐

Final location of shoe(s)

(7) PERFORATIONS/SCREENS:
☐ Perforations Method
☐ Screens Type Material

From	To	Slot size	Number	Diameter	Tele/pipe size	Casing	Liner
						☐	☐
						☐	☐
						☐	☐
						☐	☐
						☐	☐
						☐	☐

(8) WELL TESTS: Minimum testing time is 1 hour
☒ Pump ☐ Bailer ☐ Air ☐ Flowing Artesian

Yield gal/min	Drawdown	Drill stem at	Time
150	78'		1hr.
135	58'		1 hr.

Temperature of water Depth Artesian Flow Found
Was a water analysis done? Yes By whom
Did any strata contain water not suitable for intended use? ☐ Too little
☐ Salty ☐ Muddy ☐ Odor ☐ Colored ☐ Other
Depth of strata

(9) LOCATION OF WELL by legal description:
Clackamas County Longitude ° ' " Latitude ° ' "
Township 1S North Range 1 E East or W. Wm.
Section 19 SE ¼ NW ¼
Tax Lot Lot Block Subdivision
Street Address of Well (or nearest address) 7301 NE Front Ave.
Portland, Oregon 97208

(10) STATIC WATER LEVEL:
27 ft. below land surface Date 4/26/89
Artesian pressure lb. per square inch. Date

(11) WATER BEARING ZONES:
Depth at which water was first found 94'

From	To	Estimated Flow Rate	SWL
94	101	20	27
196	207	40	"
230	289	100	"
289	310	20	"

(12) WELL LOG: Ground elevation 40'

Material	From	To	SWL
Pavement, rock fill	0	2	
Brown silty sand-occ. clay	2	19	
Black silty sand-occ. clay	19	40	
Gray silt, moss	40	46	
Gray-brown silty clay	46	60	
Blue-gray silty clay	60	68	
Black gravel / broken rock	68	70	
Gray-black basalt, hard	70	94	
Brown basalt & lava, broken	94	101	27
Gray-black basalt, hard, occ. fractures	101	155	6
Gray basalt, hard	155	196	
Black-brown basalt & lava, broken	196	207	
Gray basalt, hard	207	230	
Brown basalt, broken	230	289	
Gray-black basalt, hard, occ. broken	289	310	

Date started 4/17/89 Completed 4/26/89

(unbonded) Water Well Constructor Certification:
I certify that the work I performed on the construction, alteration, or abandonment of this well is in compliance with Oregon well construction standards. Materials used and information reported above are true to my best knowledge and belief.
WWC Number
Signed Date

(bonded) Water Well Constructor Certification:
I accept responsibility for the construction, alteration, or abandonment work performed on this well during the construction dates reported above. All work performed during this time is in compliance with Oregon well construction standards. This report is true to the best of my knowledge and belief.
WWC Number 573
Signed Date 4/26/89

ORIGINAL & FIRST COPY - WATER RESOURCES DEPARTMENT SECOND COPY - CONSTRUCTOR THIRD COPY - CUSTOMER

Hahn and Associates, Inc.
434 NW 6th Avenue, Suite 203
Portland, Oregon 97209-3600
Ph. 503/796-0717 Fax: 503/227-2209

From: Phil Ralston
pralston@hahnasoc.com

8/28/03

To: Ms. Barbara Priest
Oregon Dept. Of Env. Quality
HQ: WQ-PPD
811 SW 6th Avenue
Portland OR 97204-1390

Phone: (503) 229-5945 Fax: 503.229.6037

Page 1 of 9 Pages

Message:

Dear Barbara:

Please find attached a 30-day Class V UIC Pre-Closure Notification Form, and attachments.

Please call me at 503.796.0717, with any questions you may have.

Thanks, Phil

PR