Oregon
Kate Brown, Governor

Department of Environmental Quality
Northwest Region
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January 17, 2018

Mr. Eric Durrin
Bullseye Glass Company
3722 SE 21st Ave.
Portland, OR 97202

RE: Underground Injection Control Facility Closure Report, Bullseye Glass Company 3722 SW 21st Ave. Portland Oregon. ECSI #6143

Dear Mr. Durrin:

The Oregon Department of Environmental Quality (DEQ) has reviewed the document entitled *Underground Injection Control Facility Investigation and Closure Report* dated December 2017, prepared on your behalf by Bridgewater Group. The report describes the work performed to decommission and remediate Drywell #1 (UIC #11228-1) and presents results of confirmation soil sampling from the margins of the completed excavation. DEQ approves this document.

Based on reported confirmation soil sampling data:

- Arsenic found in completed excavation confirmation soil samples was higher than DEQ Portland basin background concentrations, the DEQ Construction Worker RBC and the EPA Industrial Soil RSL.
- Cadmium found in completed excavation confirmation soil samples was higher than DEQ Portland basin background concentrations and the DEQ Construction Worker RBC.
- Lead found in completed excavation confirmation soil samples was higher than DEQ Portland basin background concentrations.
- Selenium found in completed excavation confirmation soil samples was higher than DEQ Portland basin background concentrations.

Based on reported Synthetic Precipitation Leaching Procedure (SPLP) analytical results:

- Arsenic SPLP results did not exceed EPA Drinking Water Maximum Contaminant Level (MCL).
- Cadmium SPLP results exceed the EPA Drinking Water MCL.
- Lead SPLP results exceed the EPA Drinking Water MCL.
- Selenium SPLP results exceed the EPA Drinking Water MCL.

As a result of this findings, please analyze forthcoming groundwater samples from the five monitoring wells being installed near Drywell #1 in January 2018 for dissolved and total concentrations of these four metals for one year or four sampling events.

The *Closure Report* evaluated the potential for subsurface utilities beneath roadways adjacent to Drywell #1 to be preferential pathways for movement of groundwater. DEQ agrees with the report conclusion that subsurface utilities are an unlikely preferential pathway for groundwater due to their depth and design details. DEQ will corroborate this conclusion by evaluating irregularities in forthcoming groundwater gradient information using monitoring well data.

Please feel free to call me with questions.

Sincerely,

Kenneth Thiessen CEG
Northwest Region Cleanup Section

cc: Jeff Dresser, PE
Anna St. John, RG
Cheryl Grabham, Acting Mgr. DEQ NWR Cleanup
ECSI #6143