



Oregon

Theodore Kulongoski, Governor

Department of Environmental Quality

Northwest Region Portland Office

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File 116 comm

October 3, 2005

Mr. Patrick Lucas
Pacific III, L.L.C.
17400 SW Upper Boones Ferry Road
Suite 200
Durham, Oregon 97224

Re: No Further Action Determination
Lots 1 and 2, Tax Lot 400
Former Frontier Leather Site
Sherwood, Oregon
ECSI #116

Dear Mr. Lucas:

The Oregon Department of Environmental Quality (DEQ) has completed its evaluation of a portion of the former Frontier Leather Site, located at 1210 NE Oregon Street in Sherwood, Oregon. DEQ oversight and evaluation of remedial investigations and cleanup was conducted in accordance with the terms of a Prospective Purchaser Agreement (PPA) between DEQ and Pacific III LLC, dated January 31, 2002, and documented in a DEQ Staff Report, dated November 15, 2004. The Staff Report recommended no further action (NFA) for Lots 1 and 2 of Tax Lot 400 based on a review of a series of DEQ-approved work plans and their subsequent reports.

DEQ provided a public comment period from December 1 to December 30, 2004, to announce the proposed NFA determination. No comments were received by DEQ. Based on our review of available site information, no further action is required at Lots 1 or 2 of Tax Lot 400 under the Oregon Environmental Cleanup law, ORS 465.200 *et. seq.*, unless additional information becomes available that warrants further investigation. Additional work to address environmental issues on Lot 3 of Tax Lot 400 is required under terms of the PPA.

DEQ files and the Environmental Cleanup and Site Information (ECSI) database will be updated to reflect the NFA determination. DEQ looks forward to working with you towards completion of the remaining investigative and cleanup work on Tax Lot 400 under terms of the PPA.

If you have any questions or comments about the information presented in this letter, please contact me at 503) 667-8414, ext 55009, or Mark Pugh at (503) 229-5587.

Sincerely,

Bruce Gilles, Manager
Cleanup and Emergency Response

cc: Mark Pugh, DEQ C/ER
Mitchell Morgan, Romic





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Comm 116

November 2, 2004

Mr. Patrick Lucas
Pacific III, L.L.C.
17400 SW Upper Boones Ferry Road
Suite 200
Durham, Oregon 97224

Re: No Further Action Determination
Parcel I, Tax Lot 500
Former Frontier Leather Site
Sherwood, Oregon
ECSI #116

Dear Mr. Lucas:

The Oregon Department of Environmental Quality (DEQ) has completed its evaluation of a portion of the former Frontier Leather Site, located at 1210 NE Oregon Street in Sherwood, Oregon. DEQ oversight and evaluation of remedial investigations and cleanup was conducted in accordance with the terms of a Prospective Purchaser Agreement (PPA) between DEQ and Pacific III LLC, dated January 31, 2002, and documented in a DEQ Staff Report, dated September 24, 2004. The Staff Report recommended no further action (NFA) for Tax Lot 500 based on a review of a series of DEQ-approved work plans and their subsequent reports.

DEQ provided a public comment period from October 1 to November 1, 2004, to announce the proposed NFA determination. No comments were received by DEQ. Based on our review of available site information, no further action is required at Tax Lot 500 under the Oregon Environmental Cleanup law, ORS 465.200 *et. seq.*, unless additional information becomes available that warrants further investigation.

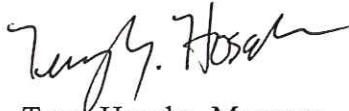
As a condition of this no further action determination, Pacific III LLC and/or its designated associate will be responsible for coordinating with DEQ for planning and installation of the storm drain line, and any other utilities that intersect the adjacent Tax Lot 600. DEQ will recover our costs for this oversight under terms of the existing PPA.

DEQ files and the Environmental Cleanup and Site Information (ECSI) database will be updated to reflect the NFA determination. DEQ looks forward to working with you towards completion of the remaining investigative and cleanup work on Tax Lot 400 under terms of the PPA.



If you have any questions or comments about the information presented in this letter, please contact me at (503) 229-5532, or Mark Pugh at (503) 229-5587.

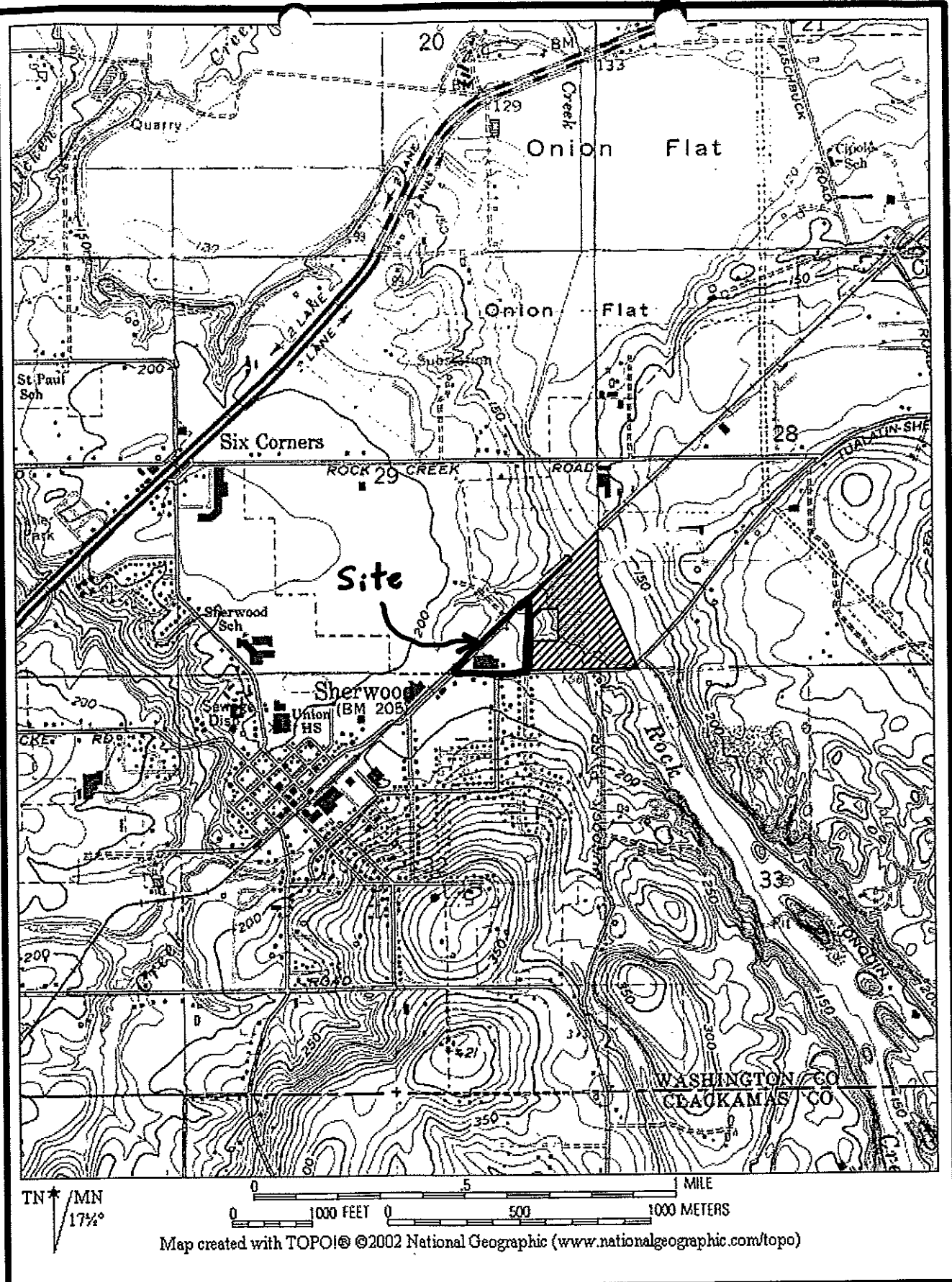
Sincerely,



Terry Hosaka, Manager
Cleanup and Emergency Response

cc: Mark Pugh, DEQ C/ER
Mitchell Morgan, ADT

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



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VICINITY MAP
 FRONTIER LEATHER, SHERWOOD, OREGON

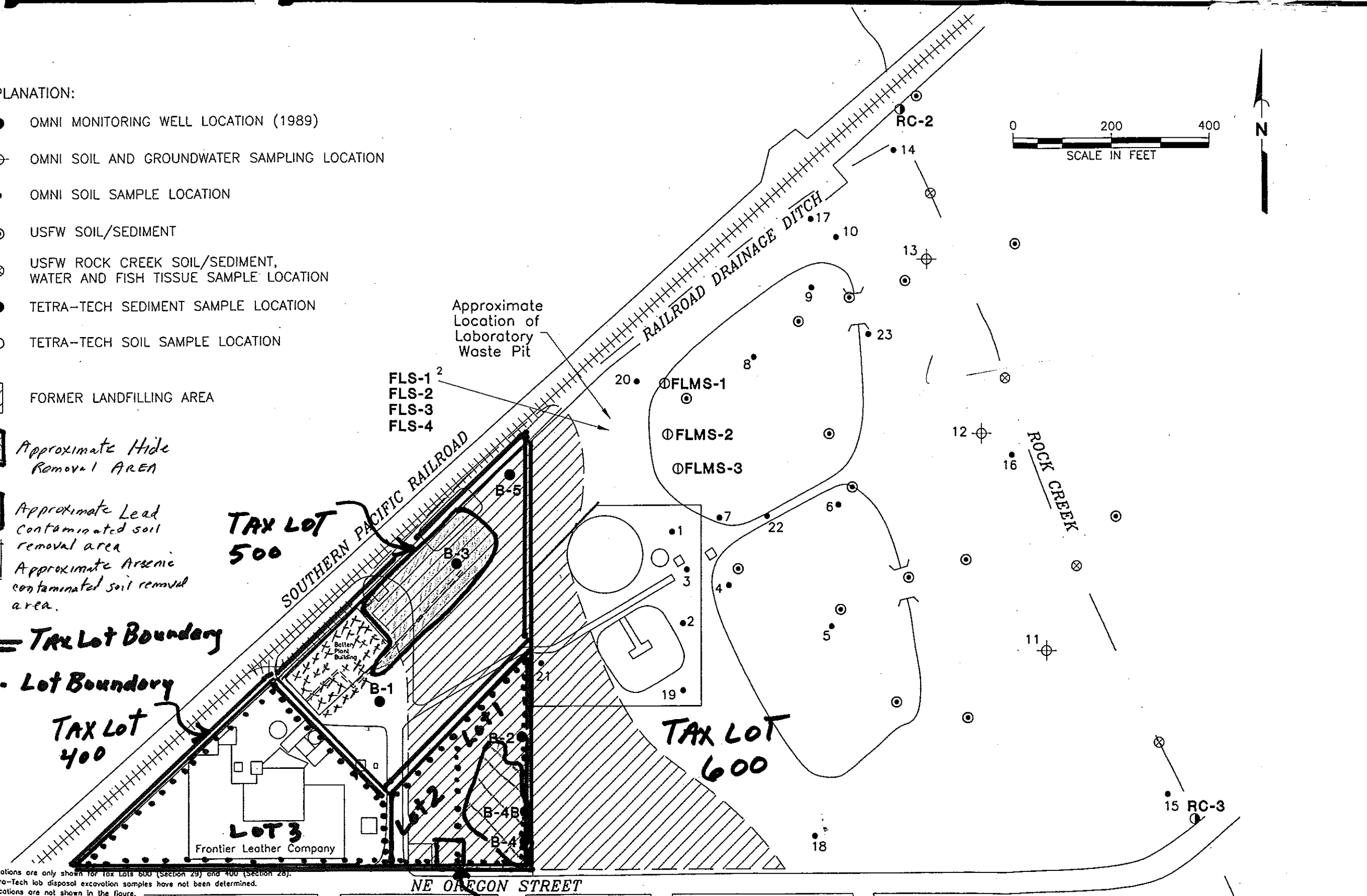
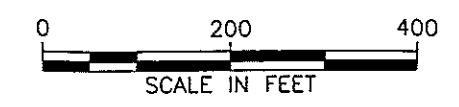
FIGURE 1

EXPLANATION:

- B-1 ● OMNI MONITORING WELL LOCATION (1989)
- 11 ⊕ OMNI SOIL AND GROUNDWATER SAMPLING LOCATION
- 1 ● OMNI SOIL SAMPLE LOCATION
- ⊙ USFW SOIL/SEDIMENT
- ⊗ USFW ROCK CREEK SOIL/SEDIMENT, WATER AND FISH TISSUE SAMPLE LOCATION
- RC-2 ⊙ TETRA-TECH SEDIMENT SAMPLE LOCATION
- FLMS-1 ⊕ TETRA-TECH SOIL SAMPLE LOCATION

-  FORMER LANDFILLING AREA
-  Approximate Hide Removal AREA
-  Approximate Lead Contaminated soil removal area
-  Approximate Arsenic contaminated soil removal area

== Tax Lot Boundary
 - - - Lot Boundary



Notes: 1. Historical sampling locations are only shown for Tax Lots 600 (Section 29) and 400 (Section 26).
 2. Exact locations of Tetra-Tech lab disposal excavation samples have not been determined.
 3. Hide Spill sampling locations are not shown in the figure.
 4. The locations of all features shown are approximate.
 5. This figure is for informational purposes only. It is intended to assist in the identification of features discussed in a related document. Data were compiled from sources as listed in this figure. The data sources do not guarantee these data are accurate or complete. There may have been updates to the data since the publication of this figure. This figure is a copy of a master document. The master hard copy is stored by GeoEngineers, Inc. and will serve as the official document of record.

Reference: Base map produced based on drawings provided in OMNI Environmental Services April 7, 1989 Preliminary Assessment and Site Investigation Battery Manufacturing Facilities and Expanded Site Investigation report and County Assessor Maps.

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Soil Remediation Areas and Tax Lot Boundaries
 FRONTIER LEATHER, SHERWOOD, OREGON
FIGURE 2

EXPLANATION:

— DEQ RI SITE BOUNDARY (LINKE PARCEL)

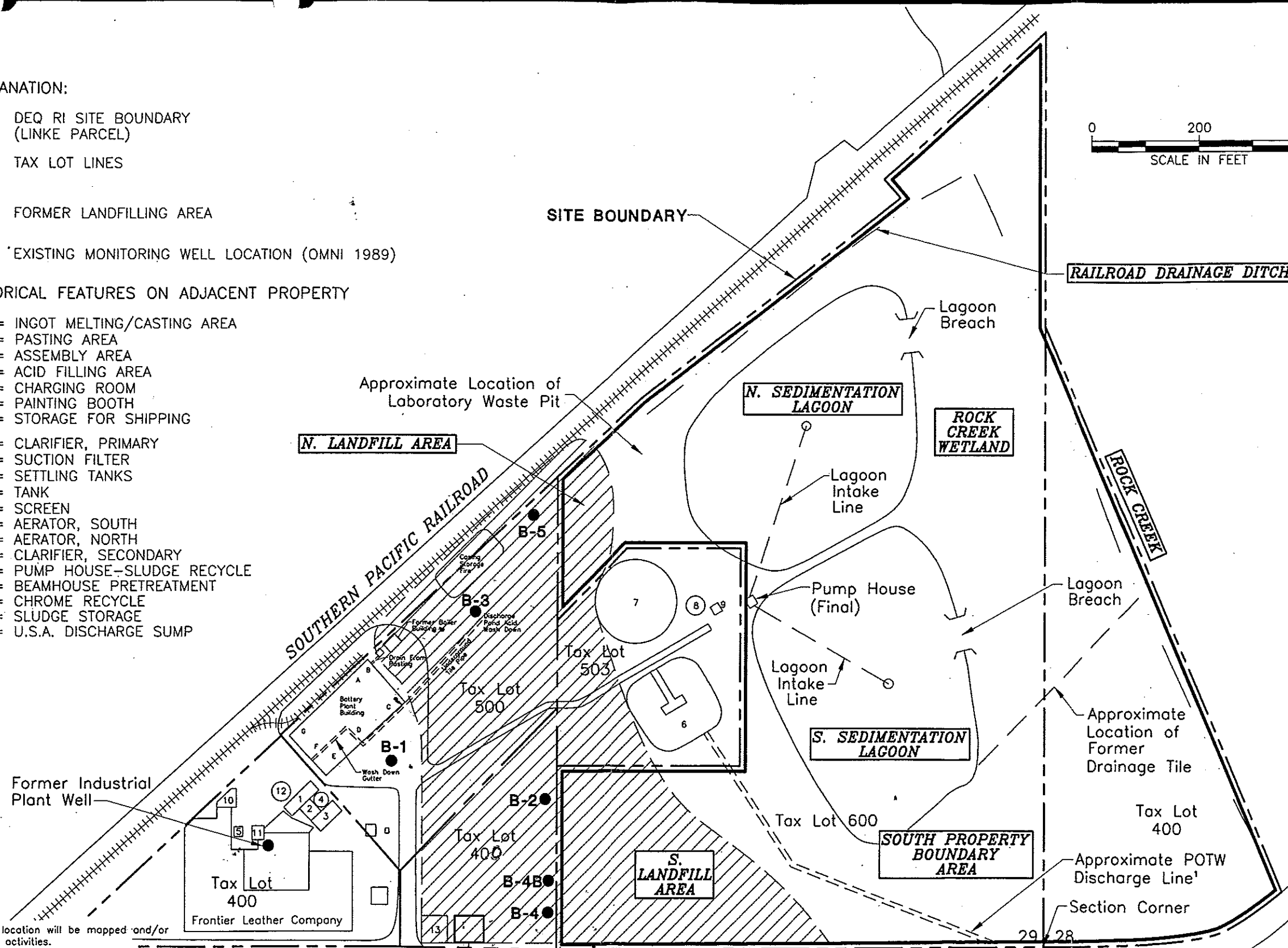
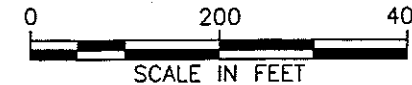
- - - TAX LOT LINES

▨ FORMER LANDFILLING AREA

B-1 ● EXISTING MONITORING WELL LOCATION (OMNI 1989)

HISTORICAL FEATURES ON ADJACENT PROPERTY

- A = INGOT MELTING/CASTING AREA
- B = PASTING AREA
- C = ASSEMBLY AREA
- D = ACID FILLING AREA
- E = CHARGING ROOM
- F = PAINTING BOOTH
- G = STORAGE FOR SHIPPING
- 1 = CLARIFIER, PRIMARY
- 2 = SUCTION FILTER
- 3 = SETTLING TANKS
- 4 = TANK
- 5 = SCREEN
- 6 = AERATOR, SOUTH
- 7 = AERATOR, NORTH
- 8 = CLARIFIER, SECONDARY
- 9 = PUMP HOUSE—SLUDGE RECYCLE
- 10 = BEAMHOUSE PRETREATMENT
- 11 = CHROME RECYCLE
- 12 = SLUDGE STORAGE
- 13 = U.S.A. DISCHARGE SUMP



Notes: 1. POTW discharge line location will be mapped and/or surveyed during field activities.

2. The locations of all features shown are approximate.

3. This figure is for informational purposes only. It is intended to assist in the identification of features discussed in a related document. Data were compiled from sources as listed in this figure. The data sources do not guarantee these data are accurate or complete. There may have been updates to the data since the publication of this figure. This figure is a copy of a master document. The master hard copy is stored by GeoEngineers, Inc. and will serve as the official document of record.

Reference: Base map produced based on drawings provided in OMNI Environmental Services April 7, 1989 Preliminary Assessment and Site Investigation Battery Manufacturing Facilities and Expanded Site Investigation report and County Assessor Maps.

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SITE FEATURES
FRONTIER LEATHER, SHERWOOD, OREGON

FIGURE 3

FIG 4. HIDE Excavation Footprint and Sampling Locations.

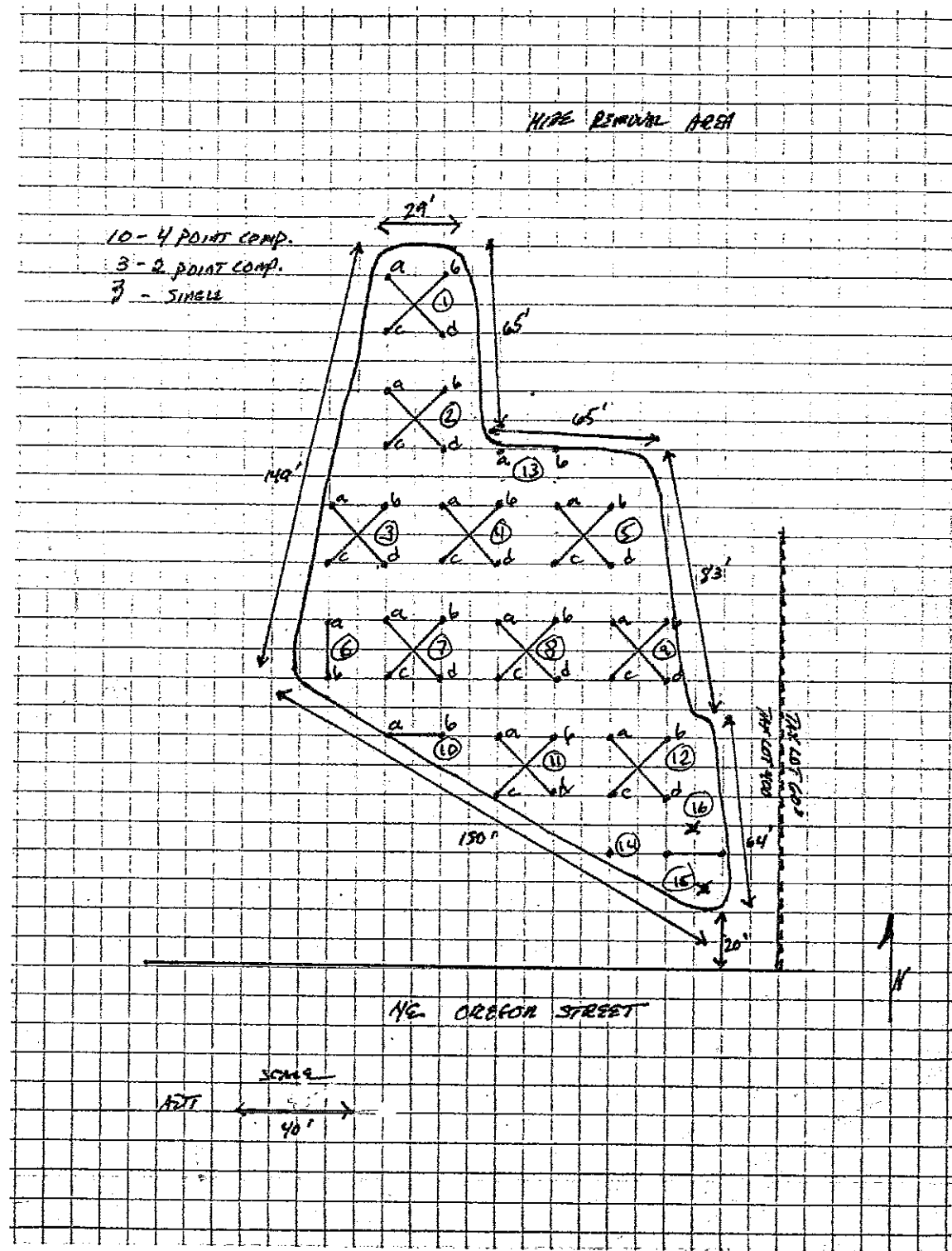


TABLE 1: Verification Test Results Summary Table

Hide Split Removal

HIDECON	HC 1a-d		HC 2a-d		PRG for Soil		IND	RES
Chromium +6	18.6	Chromium +6	3.58	Chromium +6	3.34	Chromium +6	64	30
Mercury	ND	Mercury	ND	Mercury	ND	Mercury	610	23
Arsenic	ND	Arsenic	ND	Arsenic	ND	Arsenic	1.6	7*
Cadmium	ND	Cadmium	0.589	Cadmium	0.534	Cadmium	74	37
Chromium	208	Chromium	251	Chromium	141	Chromium III	100000	100,000
Lead	4.63	Lead	1.50	Lead	6.53	Lead	750	400
Manganese	480	Manganese	450	Manganese	660	Manganese	19000	1,800
Silver	ND	Silver	ND	Silver	ND	Silver	5100	390

HC 3a-d	HC 4a-d		HC 5a-d		PRG for Soil		IND	RES
Chromium +6	3.23	Chromium +6	5.82	Chromium +6	3.84	Chromium +6	64	30
Mercury	ND	Mercury	ND	Mercury	ND	Mercury	610	23
Arsenic	ND	Arsenic	ND	Arsenic	ND	Arsenic	1.6	7*
Cadmium	0.580	Cadmium	0.406	Cadmium	0.564	Cadmium	74	37
Chromium	111	Chromium	359	Chromium	123	Chromium	100000	100,000
Lead	ND	Lead	6.49	Lead	ND	Lead	750	400
Manganese	440	Manganese	520	Manganese	350	Manganese	19000	1,800
Silver	ND	Silver	ND	Silver	ND	Silver	5100	390

HC 6a-b	HC 7a-d		HC 8a-d		PRG for Soil		IND	RES
Chromium +6	2.32	Chromium +6	4.86	Chromium +6	6.26	Chromium +6	64	30
Mercury	ND	Mercury	ND	Mercury	ND	Mercury	610	23
Arsenic	ND	Arsenic	ND	Arsenic	ND	Arsenic	1.6	7*
Cadmium	0.505	Cadmium	0.495	Cadmium	0.332	Cadmium	74	37
Chromium	32.8	Chromium	192	Chromium	539	Chromium	100000	100,000
Lead	ND	Lead	0.235	Lead	8.94	Lead	750	400
Manganese	410	Manganese	380	Manganese	370	Manganese	19000	1,800
Silver	ND	Silver	ND	Cyanide	ND	Silver	5100	390

Total Metals Results in part per million *Silver*

HC 9a-d	HC 10a-d		HC 11a-b		PRG for Soil		IND	RES
Chromium +6	1.07	Chromium +6	12.7	Chromium +6	10.6	Chromium +6	64	30
Mercury	ND	Mercury	ND	Mercury	ND	Mercury	610	23
Arsenic	ND	Arsenic	ND	Arsenic	ND	Arsenic	1.6	7*
Cadmium	0.420	Cadmium	0.535	Cadmium	0.612	Cadmium	74	37
Chromium	333	Chromium	208	Chromium	288	Chromium	100000	100,000
Lead	0.534	Lead	ND	Lead	ND	Lead	750	400
Manganese	900	Manganese	470	Manganese	540	Manganese	19000	1,800
Silver	ND	Silver	ND	Silver	ND	Silver	5100	390

IND = INDUSTRIAL USE
RES = RESIDENTIAL USE

HC 12a-d		HC 13a-b		HC 14		PRG for Soil		IND	RES
Chromium +6	4.21	Chromium +6	2.65	Chromium +6	4.08	Chromium +6	64	30	
Mercury	ND	Mercury	ND	Mercury	ND	Mercury	610	23*	
Arsenic	ND	Arsenic	ND	Arsenic	ND	Arsenic	1.6-27	7*	
Cadmium	0.363	Cadmium	0.415	Cadmium	0.497	Cadmium	74-37	37	
Chromium	495	Chromium	80.6	Chromium	214	Chromium	100000	100,000	
Lead	4.91	Lead	1.02	Lead	1.70	Lead	750	400	
Manganese	430	Manganese	380	Manganese	600	Manganese	19000	1,800	
Silver	ND	Silver	ND	Silver	ND	Silver	5100	390	

HC 15		HC 16		PRG for Soil		IND	RES
Chromium +6	2.00	Chromium +6	7.46	Chromium +6	64	30	
Mercury	ND	Mercury	ND	Mercury	610	23*	
Arsenic	ND	Arsenic	ND	Arsenic	1.6-27	7*	
Cadmium	0.437	Cadmium	0.423	Cadmium	74-37	37	
Chromium	50.9	Chromium	396	Chromium	100000	100,000	
Lead	3.54	Lead	1.29	Lead	750	400	
Manganese	490	Manganese	380	Manganese	19000	1,800	
Silver	ND	Silver	ND	Silver	5100	390	

Total Metals Results in part per million

IND = INDUSTRIAL USE

RES = RESIDENTIAL USE

* = DEFAULT BACKGROUND Concentration for Arsenic

Conclusions

The results of verification testing indicate the absence of contaminants of concern that could potentially impact human health.

Air monitoring records document the absence of migrating airborne contaminants during remediation.

All hides and soils removed from site have been accounted for and disposed of in accordance with the requirements of the PPA.

Based on the above, ADT believes that the terms and conditions of the PPA relating to buried hides in tax lot 400 have been adequately addressed and we recommend that no further actions are warranted in association with this phase.

END REPORT