

Appendix M

**I-205 Toll Project Hazardous
Materials Technical
Memorandum**

Hazardous Materials Technical Memorandum

Date	February 2023
To	Carol Snead (ODOT)
From	HDR and WSP
CC	Mandy Putney (ODOT), Heather Wills (WSP), Nicole McDermott (WSP)
Subject	Hazardous Materials Technical Memorandum

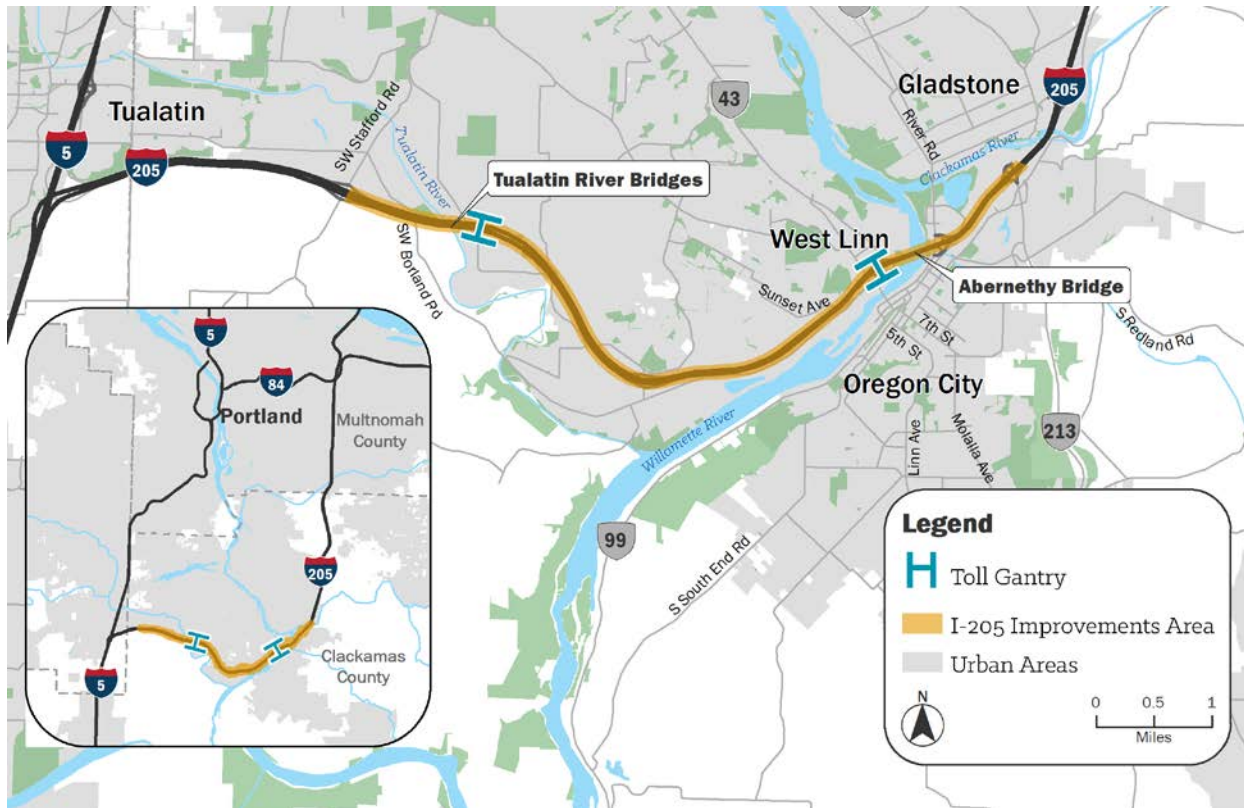
1 Introduction

This technical memorandum supports the I-205 Toll Project Environmental Assessment developed by the Oregon Department of Transportation (ODOT) in partnership with the Federal Highway Administration (FHWA). ODOT proposes to use variable-rate tolls¹ on the Interstate 205 (I-205) Abernethy Bridge and Tualatin River Bridges to raise revenue for construction of planned improvements to I-205 from Stafford Road to Oregon Route (OR) 213, including seismic upgrades and widening, and to manage congestion. The environmental assessment evaluates the effects of variable-rate tolls and the toll-funded I-205 improvements (together, the “Project”) on the human and natural environment in accordance with the National Environmental Policy Act (NEPA). The Project area is illustrated in Figure 1-1.

This technical memorandum describes the existing conditions for hazardous materials, discusses the impacts and benefits the Project would have on those conditions, and identifies measures to avoid, minimize, and/or mitigate adverse effects.

¹ Variable-rate tolls are fees charged to use a road or bridge that vary based on time of day and that can be used as a strategy to shift demand to less congested times of day.

Figure 1-1. I-205 Toll Project Area



2 Project Alternatives

ODOT evaluated two alternatives in the I-205 Toll Project Environmental Assessment and this technical memorandum:

- No Build Alternative
- Build Alternative

Figure 2-1 depicts the existing condition and the proposed lane configuration of I-205 through the Project area for the No Build Alternative and Build Alternative.

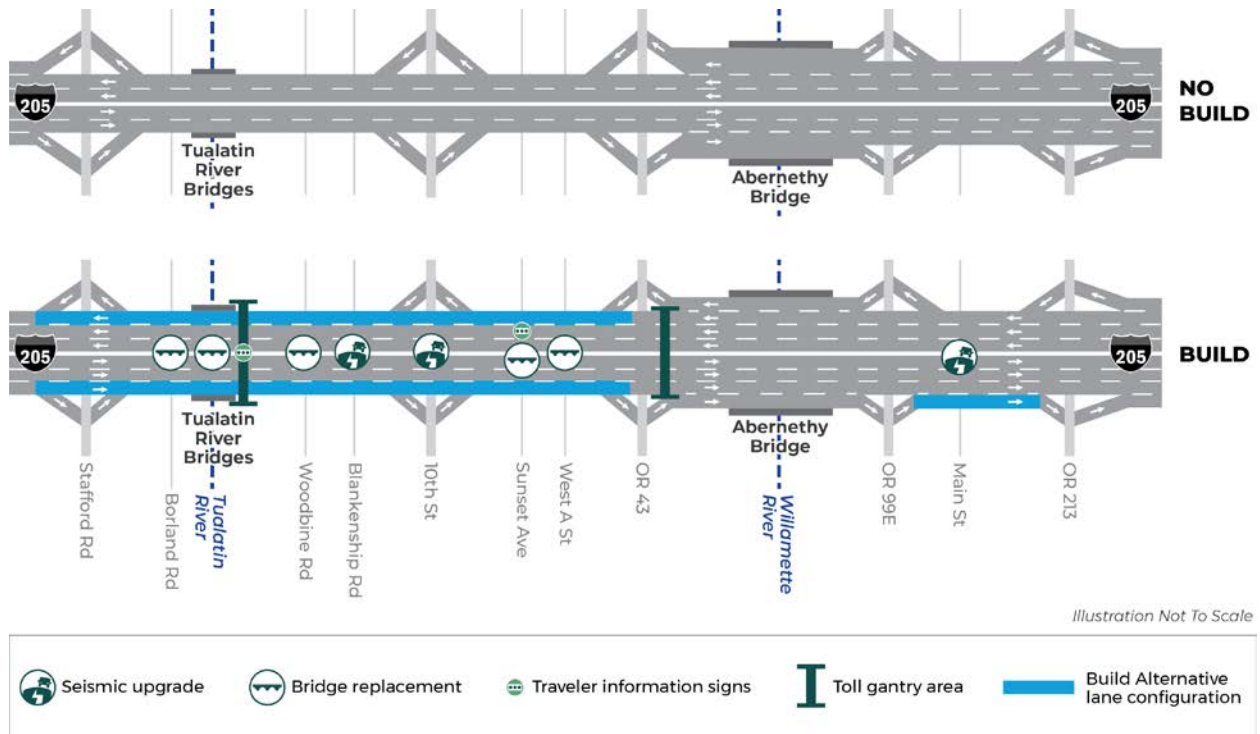
2.1 No Build Alternative

NEPA regulations require an evaluation of a No Build Alternative to provide a baseline to compare with the potential effects of a Build Alternative. The No Build Alternative consists of existing transportation infrastructure and any planned improvements that would occur regardless of the Project. The No Build Alternative includes the I-205: Phase 1A Project (reconstruction of the Abernethy Bridge with added auxiliary lanes and improvements to the adjacent interchanges at OR 43 and OR 99E) as a previously approved project that would be constructed by 2025. Under the No Build Alternative, tolling would not be implemented and the toll-funded widening and seismic improvements on I-205 between Stafford Road and OR 213 would not be constructed.

2.2 Build Alternative

Under the Build Alternative, drivers of vehicles on I-205 would be assessed a toll for crossing the Abernethy Bridge (between OR 43 and OR 99E) and for crossing the Tualatin River Bridges (between Stafford Road and 10th Street). The Build Alternative includes construction of a third through lane in each direction of I-205 between the Stafford Road interchange and the OR 43 interchange, a northbound auxiliary lane between OR 99E and OR 213, toll gantries and supporting infrastructure, as well as replacement of or seismic upgrades to multiple bridges along I-205 (shown schematically in Figure 2-1).

Figure 2-1. Schematic Diagrams of No Build and Build Alternatives



The following sections provide a more detailed description of the Build Alternative.

2.2.1 Bridge Tolls: Abernethy and Tualatin River Bridges

Under the Build Alternative, ODOT could begin tolling as early as December 2024, before the completion of construction of Project improvements to I-205. Two areas have been identified for placement of the toll gantries and supporting infrastructure. The toll gantries and supporting infrastructure would be located entirely within the existing I-205 right-of-way. Tolling would consist of an all-electronic system that would automatically collect tolls from vehicles traveling on the highway. Toll gantries would consist of vertical columns on the outside of the travel lanes and a horizontal structure that spans the travel lanes; electronic tolling equipment would be attached to the horizontal structure.

2.2.2 Improvements to I-205

Under the Build Alternative, a 7-mile portion of I-205 would be widened between Stafford Road and OR 213, with added through lanes between Stafford Road and OR 43, and a northbound auxiliary lane from

OR 99E to OR 213. Eight bridges between Stafford Road and OR 213 would be replaced or reconstructed to withstand a major seismic event. New drainage facilities would be installed in both directions of I-205.

Bridge Reconstructions and Replacements

The following bridges would be reconstructed with foundation improvements and substructure upgrades for seismic resiliency but would not be replaced:

- Northbound I-205 bridge over Blankenship Road – Mile Post (MP) 5.84
- Southbound I-205 bridge over Blankenship Road – MP 5.90
- Northbound I-205 bridge over 10th Street (West Linn) – MP 6.40
- Southbound I-205 bridge over 10th Street (West Linn) – MP 6.42
- I-205 bridge over Main Street (Oregon City) – MP 9.51

The following bridges would be replaced to meet seismic design standards and to facilitate the widening of I-205:

- Northbound I-205 bridge over SW Borland Road – MP 3.82
- Southbound I-205 bridge over SW Borland Road – MP 3.81
- Northbound I-205 bridge over the Tualatin River – MP 4.1
- Southbound I-205 bridge over the Tualatin River – MP 4.08
- Northbound I-205 bridge over Woodbine Road – MP 5.14
- Southbound I-205 bridge over Woodbine Road – MP 5.19
- Sunset Avenue (West Linn) bridge over I-205 – MP 8.28
- West A Street (West Linn) bridge over I-205 – MP 8.64

The I-205 bridges over 10th Street and Blankenship Road would be widened and raised to meet the proposed new highway grade. The I-205 bridges over the Tualatin River and SW Borland Road would be replaced on a new alignment between the existing northbound and southbound directions to accommodate construction. The I-205 bridges over Woodbine Road would be replaced on the existing alignment and raised to meet the proposed new highway grade. The Broadway Street Bridge over I-205 would be removed to enhance the function of the OR 43 interchange.

2.2.3 Construction

Construction of the Build Alternative is expected to last approximately 4 years, beginning in late 2023 with construction of toll gantries and toll-related infrastructure and continuing from 2024 through 2027 with construction of I-205 widening and seismic improvements. Most toll-related construction would be conducted alongside I-205 within the existing right-of-way. For highway widening, it is anticipated that construction would be sequenced to widen one direction of I-205 at a time, enabling traffic to be moved to a temporary alignment while the remaining widening work is completed. Construction activities would include adding temporary crossover lanes to enable access to the temporary traffic configurations during roadway widening. Staging areas for construction equipment and supplies for the Build Alternative would be located primarily in the median of I-205 in ODOT right-of-way.

3 Regulatory Framework

The following federal and state laws, regulations, plans, policies, and guidance documents informed the assessment of hazardous materials:

- Federal
 - National Environmental Policy Act of 1969
 - Federal Highway Administration NEPA-implementing regulations, Environmental Impact and Related Procedures (23 Code of Federal Regulation [C.F.R.] Part 771)
 - Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) 1980 (42 United States Code [U.S.C.] 9601 et seq.)
 - Resource Conservation and Recovery Act (RCRA) of 1976 (42 U.S.C. 6901 et seq.)
 - The Superfund Amendments and Reauthorization Act (SARA) of 1986 (42 U.S.C. 9601 et seq.)
 - The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) of 1972 (7 U.S.C. 136 et seq.)
 - The Toxic Substances Control Act (TSCA) (15 U.S.C. [C. 53] 2601-2692)
 - Council on Environmental Quality regulations (40 C.F.R. Parts 1500–1508)
- State
 - Oregon Highway Plan, 1999
 - ODOT Environmental Impact Statement Annotated Template, 2010
 - Hazardous Waste and Hazardous Materials I and Hazardous Waste and Hazardous Materials II (2003 Oregon Revised Statutes 465 and 466, as amended)
 - Underground Storage Tank Rules, 1990 (Oregon Administrative Rule [OAR] 340-150)
 - Residential Heating Oil Underground Storage Tanks, 1998 (OAR 340-177)
 - Groundwater Quality Protection, 1998 (OAR 340-040)
 - Environmental Hazards Notice, 1998 (OAR 340-130)
 - Standards Applicable for Dry Cleaning Stores Facilities and Dry Stores, 2002 (OAR 340-124)
 - Illegal Drug Lab Cleanup Assistance, 1999 (OAR 340-140)
 - Hazardous Waste Management System, 2003 (OAR 340-100 to 110, 120, 124 and 142)
 - Hazardous Substance Remedial Action Rules, 1997 (OAR 340-122)

4 Methodology

4.1 General Approach

The Project Team evaluated the affected environment (existing conditions), potential effects under the No Build Alternative and Build Alternative, and mitigation measures for hazardous materials.

4.2 Area of Potential Impact

The Area of Potential Impact (API) for hazardous materials analysis is 100 feet from the edge of I-205 right-of-way between the SW Stafford Road and OR 213 interchanges, as shown in Figure 5-1. This area is the standard regulatory records and search radius for hazardous materials and is anticipated to encompass any ground that would be disturbed as part of Project construction.

4.3 Describing the Affected Environment

The Project Team conducted a desktop analysis to assess existing conditions within the API for the presence or suspected presence of hazardous substances and petroleum products. This assessment included a review of the following studies and reports completed for the I-205 Improvements Project:

- *Level 1 Hazardous Material Corridor Study and Hazardous Building Materials Paper Survey* (HDR 2018)
- *Level 2 Preliminary Site Investigation* (HDR 2020a)
- *Structure Survey* (Reynolds Engineering 2020)
- *Shoulder Material Investigation Report* (HDR 2020b)

These previous studies utilized the following resources:

- Federal and state environmental databases for potential sites of concern within the API
- Historical and existing land uses
- Updated review of readily available information regarding geologic and groundwater conditions within the API to assess the potential for known or suspected contaminants to affect the Project, including review of the Oregon Water Resource Department well logs and Oregon Department of Environmental Quality (DEQ) database information regarding known soil, sediment, and groundwater contamination sites within the API
- Review of available historical aerial photographs, Sanborn Fire Insurance Maps, U.S. Geological Survey Topographic Maps, and County Assessor records

As available and appropriate, data from previous technical reports and agency files, including city, county, and DEQ, and reviews were collected on sites showing indicators of concern during the regulatory database review or Sanborn map review. Indicators of concern include active and known DEQ or U.S. Environmental Protection Agency cleanup sites, operations or facilities that have potential to affect the subsurface, and other known or perceived environmental conditions, spills, etc., that are found to have a potential to affect the Project.

No field surveys or testing were conducted for the hazardous materials analysis.

4.4 Effect Assessment Methods

The impacts analysis evaluates short-term (construction) direct effects, long-term direct effects, and cumulative effects on hazardous materials from the No Build Alternative and Build Alternative, as described in the following sections. No indirect effects on hazardous materials were identified from the No Build Alternative and Build Alternative.

4.4.1 Direct Effects Assessment Methods

The hazardous materials evaluation considered known sites within the API, with an emphasis on properties to be acquired. The current status of regulatory and cleanup actions was also considered. The evaluation reflects the type of contamination and the media that are contaminated. The Project Team applied professional judgment to assess the level of concern that contamination may pose for a potential acquisition property, including the level of cost and difficulty in cleanup.

The assessment evaluated the direct short-term effects from hazardous materials that could arise during construction, which are typically associated with the following risks:

- Leakage or a spill associated with construction activities, equipment, and materials including fuel, lubricants, and other hazardous substances
- Exposure to or migration of contaminants encountered in soil or groundwater during construction
- Exposure to hazardous materials in the event of demolition of buildings or structures, including lead-based paint, asbestos-containing materials, and other hazardous substances

Direct long-term effects were evaluated qualitatively by assessing activities associated with the long-term operation and maintenance of the Project. These activities generally include the need to conduct or maintain remedial actions to address contaminated materials that may remain on an existing contaminated site after construction is complete. In many cases, these remedial actions could result in long-term beneficial effects (construction within a contaminated site typically requires remedial actions to remove or manage contaminated materials, which promotes an overall long-term beneficial effect). Long-term remedial actions could include deed restrictions, engineering controls, placement of soil caps, groundwater treatment systems, or similar technologies and approach. In any case, it is in the best interest of the Project and the environment to identify contaminated sites prior to construction, and either avoid them or determine appropriate courses of action prior to acquisition.

The analysis of long-term effects considered treatment and discharge of stormwater, potential pesticide use as part of a vegetation management program, cleanup of existing contamination through public and private redevelopment within the API, and changes in traffic routing, travel time, and safety as they relate to transportation of hazardous materials and potential spills.

4.4.2 Cumulative Effects Assessment Methods

The *I-205 Toll Project Cumulative Impacts Technical Report* includes an analysis of the Project's potential to contribute to cumulative effects on hazardous materials. Therefore, cumulative effects are not discussed in this technical memorandum.

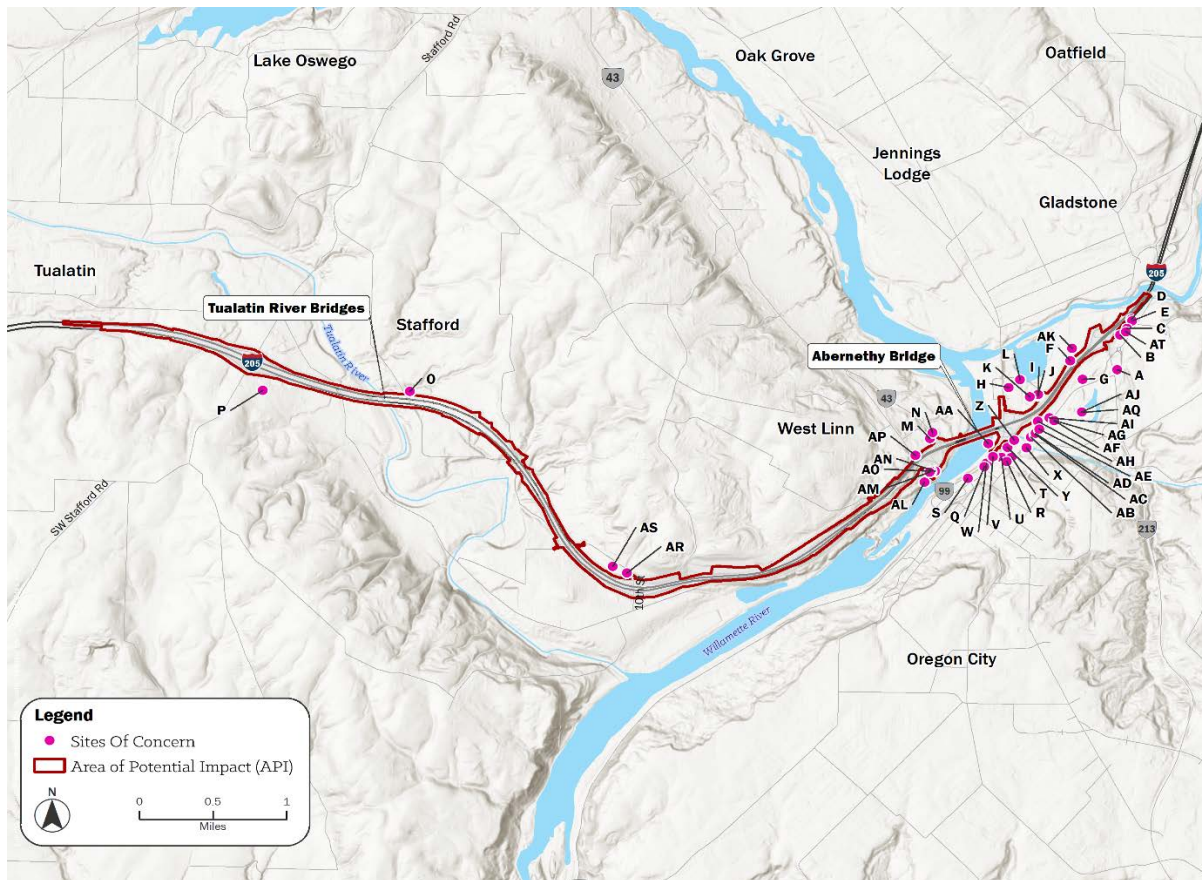
4.5 Mitigation Approach

The Project would avoid and/or mitigate most anticipated impacts. Mitigation measures, if required, were developed using applicable agency-based regulations and guidance for those agencies with jurisdiction.

5 Affected Environment

Hazardous materials investigations identified 46 sites of concern² near or within the hazardous material API, as shown in Figure 5-1 and listed in Table 5-1. Of the 46 identified sites, only two are located in the API: they are near the Willamette Falls Drive and OR 43 intersection (Figure 5-2).

Figure 5-1. Hazardous Materials Area of Potential Impact and Sites of Concern



Source: HDR 2018

² A site of concern is defined as a site with known or suspected hazardous materials contamination that could potentially migrate to areas where construction activity or property acquisition could occur. Sites of concern have sufficient possibility of contamination to warrant additional investigations.

Table 5-1. Hazardous Materials Sites of Concern in the API

Map ID	Property Description
A	Trail End 76/Trails End, 13001 Clackamas River Drive, Oregon City – This site is located approximately 430 feet south (topographically upgradient) of the API.
B	Corbett Quarry/Heritage Rock LLC, 15903 S. Park Place Court, Oregon City – This site is located adjacent to and southeast (topographically upgradient) of the API.
C	Shell Bulk Plant (Former) – Oregon City, 15898 S Park Place Court, Oregon City – This site is listed in the OR ECSI database. The facility is located adjacent to and southeast (topographically upgradient) of the API.
D	Standard Oil Bulk Plant (Former) – Oregon City, 13801 S Forsythe Road, Oregon City – This facility is located adjacent to and southeast (topographically upgradient) of the API, and is located adjacent to and northeast of the Site C.
E	Brockamp & Jaeger Site, 15796 S Boardwalk, Oregon City – This site is located approximately 105 feet east (topographically upgradient) of the API.
F	Tri City Sewage Treatment Plant/Clackamas County WES/Tri-City Water Pollution Control Facility/Tri-City Sewage Treatment Plant/Tri City Water Pollution Control Plant, 15991/15941 S Agnes Road, Oregon City – This site is located adjacent to and west-northwest (topographically downgradient) of the API.
G	Metro South Transfer Station/Metro South Station, 2001 Washington Street, Oregon City – This site is located approximately 400 feet south (topographically upgradient) of the API.
H	Firestone 3555 Fuller Mobile Gas, 123 Oregon City Shopping Center, Oregon City – This site is located approximately 300 feet north (topographically downgradient) of the API.
I	Clackamette Cove Area/Oregon City Plant, 16288 Main Street, Oregon City – This site is located adjacent to and north (topographically downgradient) of the API.
J	Former M & D Trucking Site/Ferrens Truck Repair, 16300 Main Street, Oregon City – The site is located adjacent to the north (topographically downgradient) of the API.
K	Lone Star Northwest/Glacier Northwest Inc Concrete Plant, 16381 Main Street, Oregon City – This facility is located adjacent to and north (topographically downgradient) of the API.
L	Parker Pond/The Apartments at the Cove, 16421 Main Street, Oregon City – This facility is located approximately 850 feet northwest (topographically downgradient) of the API.
M	Shell Service Station 121389/HWY 43 Texaco/D&H Holding Corporation # 2 – 22355 Willamette Drive, West Linn – This facility is located adjacent to and west (topographically upgradient) of the API.
N	Astro #216, 22250 Willamette Drive, West Linn – This facility is located adjacent to and west (topographically upgradient) of the API.
O	Heating Oil Tank, 21880 SW Johnson Road, West Linn – This facility is located adjacent to and north (topographically crossgradient) of the API.
P	Anderson, Robert N., 2691 SW Ek Road, West Linn – This facility is located approximately 520 feet south (topographically upgradient) of the API.
Q	Weiler Motor Co, 1224 McLoughlin Boulevard, Oregon City – This facility is located approximately 330 feet southwest (topographically crossgradient) of the API.
R	Buck Medical Services, 1401 Washington Street, Oregon City – This facility is located approximately 580 feet southeast (topographically upgradient) of the API.
S	Town Center Yamaha, 1301 Main – 1010 McLoughlin Boulevard, Oregon City – This facility is located approximately 320 feet southwest (topographically crossgradient) of the API.
T	Insurance Properties, 1423 Washington Street, Oregon City – This facility is located approximately 500 feet southeast (topographically upgradient) of the API.
U	Lithia Subaru of Oregon City, 1404 Main Street, Oregon City – This facility is located approximately 140 feet southeast (topographically upgradient) of the API.
V	Easy Mart, 1321 Main Street, Oregon City – This facility is located adjacent to and southeast (topographically upgradient) of the API.
W	John Link Pontiac – GMC, 1410 McLoughlin Boulevard, Oregon City – This facility is located approximately 300 feet southwest (topographically crossgradient) of the API.

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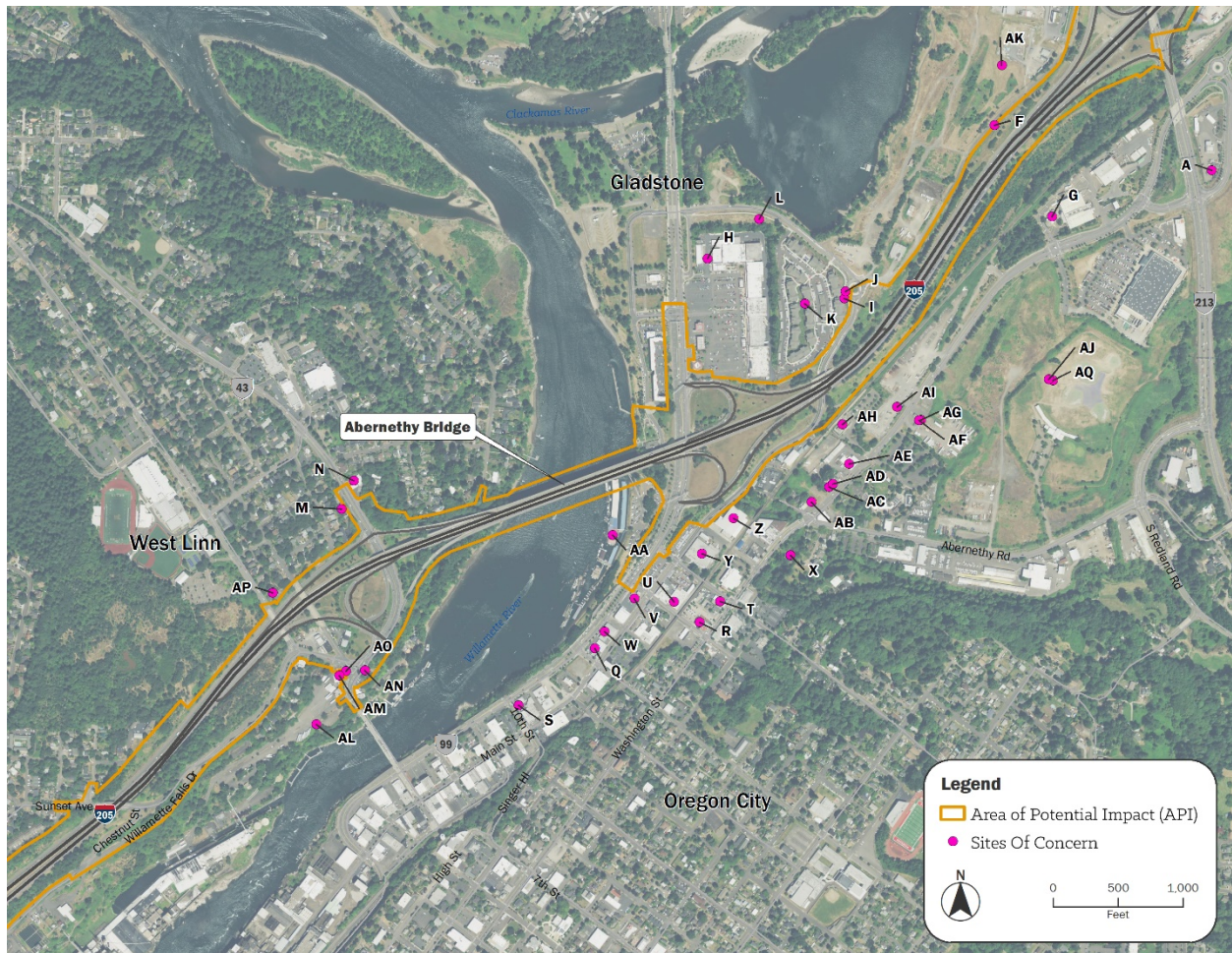
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Map ID	Property Description
X	AI's Machine (Former), 1608 Washington Street, Oregon City – This facility is located approximately 550 feet southeast (topographically upgradient) of the API.
Y	Miles Fiberglass (and Plastics) – Main Street, 1516 Main Street, Oregon City – This facility is located 120 feet southeast (topographically upgradient) of the API.
Z	Pacific Paper Trading Co/Wymore Transfer Company, 215 16th Street, Oregon City – This facility is located adjacent to and southeast (topographically upgradient) of the API.
AA	Sportcraft Landing Public Parking, 1701 Clackamette Drive, Oregon City – This facility is located adjacent to and west (topographically downgradient) of the API.
AB	Knapp, Harold, 1707 Washington Street, Oregon City – This facility is located approximately 400 feet southeast (topographically upgradient) of the API.
AC	Bud's Radiator Shop, 1715 Washington Street, Oregon City – This facility is located approximately 420 feet southeast (topographically upgradient) of the API.
AD	Smitty's Upholstery, 1721 Washington Street, Oregon City – This facility is located approximately 475 feet southeast (topographically upgradient) of the API.
AE	Landeem Welding, 1737 Washington Street, Oregon City – This facility is located approximately 310 feet southeast (topographically upgradient) of the API.
AF	Stein Oil/Kelly Field, 1780 Washington Street, Oregon City – This facility is located approximately 430 feet southeast (topographically upgradient) of the API.
AG	Kelly Field Cardlock, 1780 ½ Washington Street, Oregon City – This facility is located approximately 430 feet southeast (topographically upgradient) of the API.
AH	Stimson Lumber – Parcel 1 (Former), 1757 Washington Street, Oregon City – This facility is located approximately 70 feet southeast (topographically upgradient) of the API.
AI	Stimson Lumber Company, 1795 Washington Street, Oregon City – This facility is located approximately 250 feet southeast (topographically upgradient) of the API.
AJ	Old Rossman Landfill – South, Agness Street, Oregon City – This facility is located adjacent to and east (topographically upgradient) of the API.
AK	Unpermitted Rossman Landfill PPA, Agness Street, Oregon City – This facility is located adjacent to and north (topographically downgradient) of the API.
AL	Simpson Hog Fuel Site/James River II, 4800 Mill Street, West Linn – This facility is located adjacent to the south (topographically downgradient) of the API.
AM	West Linn BP/ConcocoPhillips 2611005/76 of West Linn 22805 Willamette Drive, West Linn – This facility is located adjacent to and north and west (topographically upgradient to crossgradient) of the API.
AN	ODOT – HWY 43 and Willamette Fall Drive/Uocal, Hwy 43 and Willamette Falls Drive, West Linn – This site is located within the API.
AO	Sullivan Electrical Substation, 5600 Willamette Falls Drive, West Linn – This facility was located adjacent to and southeast (topographically downgradient) of the API.
AP	Heating Oil Tank, 5250 Broadway, West Linn – This facility is located adjacent to and north (topographically upgradient) of the API.
AQ	Rossman's Landfill, 1101 17th Street, Oregon City – This facility is located approximately 300 feet east (topographically upgradient) of the API.
AR	Cartrick Cleaners, Inc./Catrick Cleaners, Inc., 1885B Blankenship Road, West Linn – This facility is located approximately 170 feet north (topographically upgradient) of the API.
AS	Haggen Opco North LLC/Heating Oil Tank, 1855 Blankenship, West Linn – This facility is located approximately 135 feet north (topographically upgradient) of the API.

Source: HDR 2018

API = area of potential impact

Figure 5-2. Sites of Concern Within and Near the Area of Potential Impact



Source: HDR 2018

The Project is an active automobile and truck travel corridor where unknown spills and releases may have occurred. Soil sampling was completed in 2020 at the sites of concern that were identified in the *Hazardous Materials Corridor Study* (HDR 2018) as having a moderate risk of contamination (HDR 2020a). Samples were analyzed for metals, total petroleum hydrocarbons, volatile organic compounds, polycyclic aromatic hydrocarbons, polychlorinated biphenyls, pesticides, and semi-volatile organic compounds. Most samples were within the DEQ clean fill criteria,³ except for several detections of total metals, including copper, antimony, and lead, that exceeded clean fill criteria. Although above clean fill criteria, the sampled soils were below the DEQ Excavation Work Risk-Based Concentrations and could be reused in the right-of-way away from stormwater inlets and erosional areas. Soil sampling was also completed within the upper 18 inches of unpaved shoulder areas along I-205 (HDR 2020b). The

³ "Clean fill means material consisting of soil, rock, concrete, brick, building block, tile or asphalt paving, which do not contain contaminants which could adversely impact the waters of the State or public health" (OAR 340-093-0030, Solid Waste General Provisions).

investigation identified soils that would be considered clean fill, have levels of total metals above clean fill criteria, and exceed DEQ Risk-Based Concentrations for total arsenic, in which potential contamination is possible.

A structure survey completed in 2020 (Reynolds Engineering 2020) identified asbestos-containing materials at the Sunset Avenue, West A Street, and Broadway Street bridges. Paint containing lead was identified at all of the bridges; however, the concentrations detected are below the regulatory threshold for hazardous waste.

6 Environmental Consequences

6.1 No Build Alternative

Under the No Build Alternative, no ground disturbance of existing soils nor demolition of any structures would occur to expose unknown contaminated soils or hazardous materials. No cleanup of contamination of known hazardous materials would occur, and these materials would remain in the API. Additionally, because of projected higher traffic congestion levels and degraded traffic operations under the No Build Alternative, the likelihood of spills related to vehicular crashes would increase.

6.2 Build Alternative

6.2.1 Short-Term Effects

Under the Build Alternative, construction activities such as excavation and structure demolition could expose contaminated soils and materials. Accidental spills of hazardous materials from construction machinery would also be a risk during construction. In-water work at the Tualatin River Bridges could result in contamination of waters during construction from structure demolition and potential spills.

During construction, best management practices (BMPs) such as proper materials and waste management, daily inspection of heavy equipment, and preparation of hazardous waste determinations would be implemented to reduce the risk of accidental spills, prevent pollution, and protect existing wetlands and waterbodies. Hazardous materials such as asbestos-containing materials would be disposed of at an approved disposal site, while soils that contain contaminants at concentrations greater than DEQ clean fill levels, but less than DEQ's occupational risk-based concentrations, would be disposed of in the ODOT right-of-way. The contractor would prepare Project-specific plans such as a Contaminated Media Management Plan, Asbestos Abatement Plan, and Pollution Control Plan prior to construction. Hazardous materials would be handled and disposed of according to state and federal regulations, as well as the ODOT *HazMat Program Manual* (ODOT 2020). No construction activities would occur on or near the two sites of concern in the API.

6.2.2 Long-Term Effects

Some surface soils down to 18 inches below ground surface contain contaminants that are above DEQ's Clean Fill Standards but below the DEQ Excavation Worker Risk-Based Concentrations (HDR 2020b). These soils would be disposed of within ODOT-owned right-of-way or a regulated disposal site. Asbestos-containing materials and lead paint would be removed and properly disposed of at an approved off-site hazardous waste disposal site. Removing hazardous materials from the API would lead to a long-term net

benefit in the API. In addition, under the Build Alternative, traffic operations would improve, which would likely reduce vehicular crashes and, therefore, reduce the potential for spills of hazardous materials.

6.3 Summary of Effects

Table 6-1 provides a comparison of anticipated effects on hazardous materials by alternative.

Table 6-1. Summary of Hazardous Materials Effects by Alternative

Effects	No Build Alternative	Build Alternative
Short-Term	<ul style="list-style-type: none"> ▪ None 	<ul style="list-style-type: none"> ▪ Encountering hazardous materials and risk of accidental spills during construction
Long-Term	<ul style="list-style-type: none"> ▪ Potential increase in vehicular spills from worsening traffic operations on I-205 	<ul style="list-style-type: none"> ▪ Removal and disposal of hazardous materials ▪ Reduction of accidental vehicular spills due to improved traffic operations along I-205

7 Avoidance, Minimization, and/or Mitigation Commitments

Construction contractors would be required to implement BMPs to minimize the potential for hazardous materials release. No additional mitigation for construction is required. There would be no long-term impacts related to hazardous materials under the Build Alternative, and the Build Alternative would result in long-term benefits related to removal and reduction of hazardous materials; therefore, no avoidance, minimization, and/or mitigation measures are proposed.

8 References

HDR. 2018. *Level 1 Hazardous Material Corridor Study and Hazardous Building Materials Paper Survey for the I-205 Improvements Project*.

HDR. 2020a. *Level 2 Preliminary Site Investigation for the I-205 Improvements Project*. October 2020.

HDR. 2020b. *Shoulder Material Investigation Report for the I-205 Improvements Project*. November 2020.

Oregon Department of Transportation (ODOT). 2020. *HazMat Program Manual*. https://www.oregon.gov/odot/GeoEnvironmental/Docs_GeologyGeotech/HazMat_Program_Manual.pdf. Accessed June 9, 2022.

Reynolds Engineering. 2020. *Structure Survey. I-205: Stafford Road to OR99E Project*. October 2020.