

RESOLUTION NO. 878

A RESOLUTION REQUESTING A DELAY IN THE ISSUANCE OF A PERMIT FOR THE SITING AND OPERATION OF THE WESCOMP HAZARDOUS WASTE STORAGE FACILITY, PENDING REVIEW AND COMMENT BY DEQ AND EPA ON THE POTENTIAL EFFECTS ON GROUDWATER QUALITY IN THE COLUMBIA BASIN AQUIFER AND PENDING REVIEW AND COMMENT BY ODOT ON THE TRAFFIC IMPACTS AT THE STAFFORD INTERCHANGE.

WHEREAS, the City of Wilsonville has concerns with regards to the issuance of a hazardous waste storage facility permit for WesComp as follows:

1. The City of Wilsonville's water supply is currently from ground water out of the Columbia Basin Aquifer. The WesComp facility is sited over the Columbia Basin Aquifer. While the City understands the application has been under careful review by the Department of Environmental Quality's (DEQ) Hazardous Solid Waste Division, it is not clear to what extent, if any, a review process has been conducted by either DEQ's Water Quality Division or the Environmental Protection Agency's (EPA) equivalent department for water quality. Without assurance from DEQ and EPA that water quality in this aquifer will not be adversely affected by this hazardous waste storage facility, issuance of the required permit would be premature;

2. The City understands that currently, WesComp voluntarily conducts well monitoring. Should DEQ/EPA decide to issue a permit to WesComp, the City requests that DEQ and EPA, as a prudent, minimum safeguard, require ongoing monitoring of the existing wells in the area with the frequency and standards for testing to be established by DEQ/EPA as a condition of the issuance of a permit;

3. The City of Wilsonville is concerned over the potential impact of truck traffic on the north Wilsonville Stafford Interchange (286) which has a record level of service problems now and which the City expects could worsen during the reconstruction. It is not evident from the record that the Oregon Department of Transportation has commented on this proposal, and if they have not, they should be asked to do so before issuance of the permit. At a minimum, a condition of the permit should be that WesComp regulate the dispatching of trucks so as to avoid peak traffic hours at the north Wilsonville interchange and that their truck traffic be coordinated through ODOT, Washington County and the City of Wilsonville; and

4. The City is concerned as to what, if any requirements are included in the permit process to provide due diligence is performed to insure that a future operator and its operations will be held to the same standards and have the same level of experience and environmental concern that Riedel has demonstrated; and

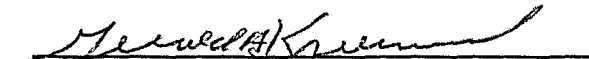
WHEREAS, the City Council has caused its City Manager to preliminarily place in the record of the permit proceedings, its concerns by her letter of October 29, 1991, a copy of which is marked as Exhibit "A", attached hereto and incorporated herein, and to confirm the City's permission to preserve its ability to formally adopt its concerns by this Resolution at its regular meeting of November 4, 1991, for forwarding to DEQ and EPA, and WesComp for entry into the record of the proceedings.

NOW, THEREFORE, THE CITY OF WILSONVILLE RESOLVES AS FOLLOWS:

1. The City Council of the City of Wilsonville conditionally opposes the issuance of a permit for a Hazardous Waste Storage facility to WesComp until such time as the City's concerns set forth in its recitals 1 - 4 above are fully and completely addressed.

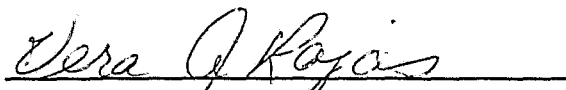
2. The City Manager is authorized and directed to forward a copy of this Resolution to DEQ, EPA and WesComp so that it may be entered in the record of the pending licensing proceeding.

ADOPTED by the Wilsonville City Council at a regular meeting thereof this 4th day of November, 4, 1991 and filed with the Wilsonville City Recorder this same date.



GERALD A. KRUMMEL, Mayor

ATTEST:



VERA A. ROJAS, CMC, City Recorder

SUMMARY of Votes:

Mayor Krummel	<u>AYE</u>
Councilor Carter	<u>AYE</u>
Councilor Chandler	<u>AYE</u>
Councilor Lehan	<u>AYE</u>
Councilor Van Eck	<u>AYE</u>

City of
WILSONVILLE
In OREGON

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Wilsonville, OR 97070
(503) 682-1011

EXHIBIT "A"

October 29, 1991

Mr. Fred Bromfeld
DEQ-HSW
811 SW 6th Ave.
Portland, OR 97204

SUBJECT: WESTERN COMPLIANCES INC. APPLICATION FOR A
HAZARDOUS WASTE STORAGE FACILITY AT
11330 SW CLAY STREET, SHERWOOD, OREGON

Dear Mr. Bromfeld:

This letter is written in response to your request for comments with respect to the issuance of a hazardous waste storage facility permit for Wescomp. The City of Wilsonville is very concerned over the potential adverse effects of this siting on groundwater quality in the Columbia Basin Aquifer. It is my understanding that although this application has been under careful review by DEQ's Hazardous Solid Waste Division, it has not been through the same review process in DEQ's Water Quality Division. Without assurance from DEQ that water quality in this aquifer will not be adversely affected by this hazardous waste storage facility, approval of the requested permit would be premature. Furthermore, I do not know whether or not the EPA has reviewed this application with respect to water quality and again, it would be premature to approve the permit until the EPA is also prepared to sign off on the application with respect to the water quality issue.

Should DEQ/EPA decide to issue a permit to Wescomp without addressing these water quality issues, the City would request at a minimum that DEQ and EPA require ongoing monitoring of the existing wells in the area with the frequency and standards for testing to be established by DEQ/EPA as a condition of the issuance of the permit. It is my understanding that well monitoring is currently being done by Wescomp on a voluntary basis, but it should be included as a condition of the permit.

Additionally, the City of Wilsonville is concerned over the potential impact of truck traffic on the north Wilsonville Stafford Interchange which has a record level of service problems now and which the City expects will worsen during the reconstruction of the interchange scheduled for 1994. It is not evident from the record that the Oregon Department of Transportation has commented on this proposal, and if they have not, they should be asked to do so before issuance of the permit. At a minimum, a condition of the permit should be that Wescomp regulate the dispatching of trucks so as to avoid peak traffic hours at the

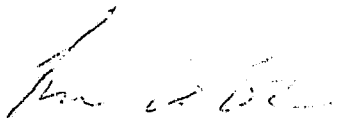
north Wilsonville interchange, and that their truck traffic be coordinated through ODOT and Washington County.

I am further concerned that the Wescomp operator is currently in the process of selling a portion of their business, Riedel Environmental Services. What requirements are included in the permit process to ensure that future operations will be held to the same standards and have the same level of experience and environmental concern that Riedel has demonstrated.

I am sending this letter in order to meet your October 31st deadline for comments. The Wilsonville City Council will be taking formal action through the adoption of a resolution at their regularly scheduled meeting of November 4, 1991. I understand that even though the official comment period will have closed, you will accept the Council's resolution as the City's official position.

I thank you for your consideration of the concerns of the City of Wilsonville.

Sincerely,



Arlene Loble
City Manager

cc: Ms. Dawnee Dahm, EPA

al:lb