



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

Northwest Region

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January 30, 2024

*via electronic delivery*

Attn: Jill Betts

Coles + Betts Environmental Consulting, LLC

5741 NE Flanders Street

Portland, Oregon 97213

Re: **DEQ Comments on Revised Independent Cleanup Pathway Final Report**

Molalla/Highway 211

Tax Lot 1700 (5S, 2E, 7, 01700), Molalla, Oregon 97038

Clackamas County

ECSI File No. 6510

Jill,

The Oregon Department of Environmental Quality (DEQ) reviewed the January 2, 2024 revised “Independent Cleanup Pathway Final Report” and “Response to DEQ Comments” letter for the Molalla/Highway 211 project (“Site”), prepared by Coles + Betts Environmental Consulting, LLC on behalf of Dean Leasing, LLC. DEQ appreciates your consideration of DEQ’s prior comments in our October 2, 2023 letter, and incorporation of recommendations in the revised ICP report. DEQ is providing this letter to document our additional comments on the report. However, DEQ is not requesting the comments be addressed in a second revised report but rather to offer points of clarification.

### General Comments

- 1) References to EPA’s Regional Screening Levels are still included in the report; however, the report text has been revised to clarify DEQ’s Risk-Based Concentrations are being used for risk screening.

### Specific Comments

- 2) Section 7.5 Conceptual Site Model. Prior DEQ comments #6 and #7 attempted to convey that the soil ingestion, inhalation and dermal contact exposure pathway is viewed as one holistic route of exposure category. Ingestion would not be evaluated separately from inhalation and dermal contact and, therefore, not be eliminated as a potential exposure route. It is expected that Figure 9, if updated, would indicate ingestion as a primary route of exposure, along with inhalation and dermal contact. Further, the primary release mechanism in Figure 9 would be burning of household trash, leaching from fill piles, and use of pesticides.
- 3) Table 1. Reference to the mixture hexachlorodibenzo-p-dioxin is unnecessary. It is assumed based on other revisions to the table that “none” listed in the Wetland N pesticide data column also means not detected above laboratory reporting limits (“U”).
- 4) Table 3. The date “January 2021” appears to be a typo and should be 2022. DEQ clarifies that for areas outside of the wetland feature, dioxins/furans are screened against DEQ’s default human health risk-

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based concentrations (RBCs) for soil ingestion, dermal contact, and inhalation. Ecological RBCs only apply to samples collected from the wetland feature. As indicated on Table 3, wetlands samples were not analyzed for dioxins/furans. The revised ICP report indicates that wetlands samples were not analyzed for dioxins/furans because stormwater flow observations made during soil removal activities did not suggest a complete stormwater transport pathway from the dioxins/furans contaminated soils to the wetland feature. DEQ believes that the lack of dioxins/furans data from the wetlands is a potential data gap. However, since the wetlands will be removed soon as part of redevelopment activities, DEQ does not require further investigation to support a no further action decision.

DEQ appreciates your cooperation and diligence in revising the ICP report. Based on the information documented in the ICP report and DEQ's understanding of future use of the site and lack of risk to site receptors, DEQ will prepare a Partial No Further Action Determination letter. Please contact me at (503) 686-3903 or [kara.e.master@deq.oregon.gov](mailto:kara.e.master@deq.oregon.gov), if you wish to meet to discuss any of the comments above.

Respectfully,



Kara Master, Project Manager  
Northwest Region Cleanup Section

Cc: Wes Thomas, DEQ  
Dean Leasing, LLC  
Jennifer Gates, Pearl Legal Group