



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

April 3, 2024

Ryan Webb, P.E.

Project Manager

The Confederated Tribes of Grand Ronde Community of Oregon

9615 Grand Ronde Road

Grand Ronde, Oregon 97347

sent via e-mail: [Ryan.Webb@grandronde.org](mailto:Ryan.Webb@grandronde.org)

RE: Blue Heron Mill PPA

419/427 South Main Street

Oregon City, Oregon

ECSI #4811

Dear Ryan:

The Oregon Department of Environmental Quality (DEQ) reviewed a *Draft Soil and Groundwater Focused Remedial Investigation Report*, prepared by WSP USA Environment and Infrastructure, Inc. (WSP) Inc. and dated February 26, 2024. DEQ's comments are presented below.

### General Comments

The report reflects a substantial, well-coordinated and executed data collection and compilation effort.

DEQ no longer recognizes "urban residential" as a generic risk exposure scenario. Please use residential RBCs for screening in the revised report. DEQ may approve site-specific RBCs on a case-by-case basis. Please revise the highlighting on data tables to distinguish between residential, occupational, construction and excavation worker screening exceedances.

Risk screening methodology used in the data evaluation does not differentiate between exposure intervals for the various potential receptors. E.g., in the report, samples below depths of 3 feet are screened against RBCs for all exposure scenarios, although the residential or occupational direct contact exposure pathway, which only considers the upper 3 feet (or sometimes 5), would not be considered a complete pathway for deeper soil unless this deeper soil was brought to the surface or exposed during site grading. This results in overestimates of remedial soil volumes and data gaps identified for vertical soil delineation (e.g., if the contaminant already has been delineated to its applicable RBC at a shallower depth).

It would be helpful to include a figure showing how the site was divided into "north" and "south" areas for the purpose of the RI.

A map of bedrock topography, which would provide information on the depth and extent of unconsolidated deposits, would be useful for planning purposes.

### Specific Comments

Section 1.3.1 Report Content, first bullet

Soil Screening did not include total PCBs. See comment on Table 3.

Section 1.3.1 Report Content, last sentence

Page 2 of 4

The recommendations presented in the report are general. Substantive recommendations on additional work to address data gaps or areas that should be remediated should be provided.

Section 2.2.1 North Side

The inability to advance S37 and S43 should be discussed in terms of whether this presents a data gap and how it affects delineation of contamination.

Section 2.3 Bleach Plant Waste Pile Investigation, last paragraph

These samples are not included in Table 1.

Section 2.4.1.1 North Side

Boring logs indicate that temporary wells were installed for 3 hours, not 2 as reported here.

Section 4 Nature and Extent of Contamination

In many cases the source and release mechanism of detected contaminants is unknown (e.g., BaP TEQ, arsenic, lead) and therefore the basis for estimating impacted soil volumes is unclear. Buildings or other infrastructure may constrain soil contamination. In some areas, e.g. Group 5, there are no bounding samples, so the assignment on extent of contamination seems arbitrary without further explanation in the text.

Section 4.2 Data Quality Assessment and Validation

Hotspots are presented here but there is no other discussion in the report on whether hotspot concentrations are present in site media. Include a section that identifies hotspot concentrations. Hot spot considerations should also consider the presence of NAPL or highly concentrated residuals in the tank area, for instance - and any other areas where sheen, etc. is present that is mobile and/or not reliably contained.

Section 4.3.1.2 North Side RI Group 2 – Parking Lot West of Building 1

Ideally, the RI sample area would have encompassed both samples F01-01 and F01-02, which may have resolved the question on extent of contamination.

The text indicates sampling depths range from 3 to 12 feet. The maximum sample depth listed in Table 1A is 10 feet.

Section 4.3.1.12 South Side RI Group 5

The small areas of lead impacts and basis for volume estimates are not clear. Please expand and clarify.

Section 4.3.5 UST Area

DEQ RBCs have not been established for heavy oil due to its variable composition. Tables for the RI north area (correctly) do not include screening criteria for heavy oil and they should be removed from data tables. It is acceptable to use TPH-D RBCs for screening, but this should be noted in the data tables for both RI areas.

Section 8.1 Risk Assessment

Without a quantifiable risk assessment, it is unclear how identification of areas requiring remedial action will be identified for carrying into a feasibility study.

Section 8.2 Specific Site Areas

Please include the type of RBC (residential/occupational/construction/excavation work) is exceeded in each area.

Recommendations for specific investigative or remedial tasks to address Table 6 data gaps should be provided. It would be helpful to include a column on Table 6 with the general approach to addressing each data gap.

Tables

Tables 1A-1F are not referenced in the body of the report.

Table 2.

Please fix the page number formatting.

Table 3, Page 1

Total PCBs should be compared to RBC for total PCBs.

Table 3, Page 7

Please check the screening criteria for 2,3,7,8 TCDD and 2,3,7,8 TCDD Equivalents. E.g., occupational, construction and excavation worker RBCs for 2,3,7,8 TCDD Equivalents are not listed.

“W”-series boring logs

It would be helpful to indicate on the logs that the drill casing was driven to target depth and no soil samples or cuttings were collected/observed.

Boring log S28

Table 1A indicates a deep sample collected from 11-12 feet; this log lists 8-9 feet.

Boring Log S30

Tables 1A et al list boring depths as 9 feet.

Boring Logs S35, S36 and S38

Boring depths listed in Tables 1 differ than what is indicated on these logs.

Figure 4A

The estimated extent of lead is based on 800 mg/kg, the DEQ RBC for direct contact under occupational exposure settings. For other contaminants of concern urban residential RBCs are used for inferring extent of contamination.

**Closing**

Please revise the report to address these comments and let us know if you have any questions or would like to schedule a meeting to discuss.

Sincerely,



Mark Pugh  
Project Manager  
Northwest Region Cleanup Section

e-copy: Stacia Martin, CTGR ([Stacia.Martin@grandronde.org](mailto:Stacia.Martin@grandronde.org))  
Heidi Nelson, DEQ ([nelson.heidi@deq.oregon.gov](mailto:nelson.heidi@deq.oregon.gov))  
John Kuiper Wood, ([john.kuiper@wsp.com](mailto:john.kuiper@wsp.com))  
Carrie Rackey, Stantec ([Carrie.Rackey@stantec.com](mailto:Carrie.Rackey@stantec.com))  
Len Farr, Stantec ([Leonard.Farr@stantec.com](mailto:Leonard.Farr@stantec.com))  
Margaret Olson, EPA ([Olson.Margaret@epa.gov](mailto:Olson.Margaret@epa.gov))