



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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July 27, 2023

via electronic delivery

Dave Johnson
PO Box 83706
Portland, OR 97293

Re: Focused Removal Action
PCB Areawide – N Bradford St. ROW, Portland, Oregon
Peninsula Iron Works, ECSI ID# 6480

Dear Dave Johnson:

The Oregon Department of Environmental Quality (DEQ) reviewed the July 13, 2023, revised Focused Removal Action Work Plan (Work Plan) and supplemental response letter prepared by Evren Northwest, on behalf of Peninsula Iron Works (PIW). The Work Plan describes the proposed removal action of polychlorinated biphenyls (PCB) contaminated soil around the PIW Facility, Building 2, at 6618 North Alta Avenue in Portland, Oregon (ECSI #6480) and the additional sampling to occur in Decision Unit 10. DEQ comments on the revised Work Plan are provided below.

1. Section 3.0 Field Methods and Procedures: DEQ appreciates the information about how excavation spoils will be handled during removal activities. Please also include a bullet about implementation of best management practices to maintain a safe environment, including dust control measures.
2. Section 3.2.2 Incremental Sampling Methodology: The Work Plan states that soil increments “will be collected from the center node of each increment grid”, but also states that replicate locations will be identified within each grid “in the same manner [as the original increment locations] using the systematic random collection scheme”. Please rectify this discrepancy in the text of the Work Plan to reflect that sampling locations will be determined using the systematic random sampling method.
3. Section 3.5 Placement of Demarcation Fabric and Excavation Backfill: Please confirm the thickness of the $\frac{3}{4}$ inch crush gravel overlay will be 0.5 feet.

Please incorporate DEQ’s comments below and submit a final work plan. If you have any questions, please contact me at (503) 926-2257 or rebecca.digiustino@deq.oregon.gov.

Sincerely,

Rebecca Digiustino
Project Manager
Northwest Region Cleanup Section

Ec: David Hodson, Jacobs
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Todd Hudson, Oregon Health Authority