



Oregon

Kate Brown, Governor

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February 7, 2019

Via Electronic Mail

Noelle Wooten

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Re: DEQ Response to OfficeMax Proposal to Finalize Remedial Action Objectives

Boise St. Helens/White Paper (ECSI No.14)

Dear Ms. Wooten:

The Department of Environmental Quality (DEQ) is preparing this letter to close the loop on remaining issues pertaining to Remedial Action Objectives developed for the former Boise White Paper site over the last 18 months. The DEQ team has been meeting and working over the last couple of weeks to address the following items as referenced in your email communication of January 22, 2019.

- 1) OfficeMax proposed to set the PCB background value at a value of 13 µg/kg. OfficeMax made this proposal to DEQ as an alternative to performing additional investigation to establish background values for total PCBs and other minor contaminants of concern. OfficeMax did not provide any information or documentation supporting this value, however.
- 2) OfficeMax requested to limit the in-water Mill Areas adjacent to the site being considered for active remediation to 1, 2 and 3, consistent with a previous determination by DEQ as documented in an October 2013 comment letter.

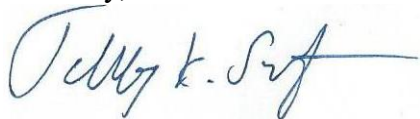
In reference to item 1 above, DEQ undertook an evaluation of the existing background data set, incorporating the 2009 natural background Incremental Sampling Method (ISM) data, data provided by EPA, and background data collected in the vicinity of the Port of St. Helens and Armstrong facilities. DEQ notes the data have shortcomings (i.e., limited number of samples, mixture of Aroclor and congener PCB sampling methods and data qualifiers). Consistent with methods used in Portland Harbor, and as used by DEQ to set the total dioxin background (Mammalian TEQ) value of 5 ng/kg, DEQ adjusted the background data to account for the difference in organic carbon (OC) content in the natural background study area, samples collected in and near Scappoose Bay, and the Multnomah Channel and the Site.

DEQ's evaluation indicates 11 µg/kg best represents the mean background concentrations for PCBs applicable to Mill Areas 1-3. Although DEQ is not ruling out a different background concentration, DEQ would like to know if there is an underlying technical basis for OfficeMax's background concentration of 13 µg/kg. Clarification on this point would be appreciated and would facilitate the parties coming to agreement on a final value.

With regard to number 2 above, DEQ has reviewed information pertaining to sampling performed as part of the data gap investigations for the Boise White Paper site, historical property use information, investigation and cleanup performed at the former Boise Veneer Plant, and multiple sheen events reported in the vicinity of Frogmore Slough in 2016. Based on consideration of this information, DEQ has determined that the potential presence of NAPL in Frogmore Slough is unlikely to have originated from historical releases at the Mill Site. As such, DEQ agrees to OfficeMax's request to limit the Feasibility Study (FS) to Mill Areas 1-3. DEQ will pursue other parties to investigate sediment contamination in the vicinity of Frogmore Slough and the former Veneer Plant.

In summary, DEQ and OfficeMax are very close to agreement on these issues. DEQ looks forward to receiving a reply regarding the underlying technical basis for the proposed PCB background value. DEQ believes that the majority of roadblocks to entering the FS phase of the project have been sufficiently resolved or deferred and our collective efforts would be best spent in pursuit of achieving a draft of this milestone document by early 2020.

Sincerely,



Jeff K. Schatz, R.G.
Project Manager
Northwest Region Cleanup Program

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Attachment-
DEQ Memorandum, January 31, 2019

(jks:JKS)