

DEQ Comment:

1. To document the management and control of offsite migration of contaminated soil during construction, please provide information regarding the active pursuit of appropriate stormwater permits. Ideally, you could also indicate the type of plans being developed in support of that application, such as the Erosion and Sediment Control Plan, Contaminated Media Management Plan, and Environmental Management Plan.

Response:

Our team is currently in contact with Kathy Jacobsen at Oregon DEQ, working with her to obtain a 1200-C NPDES Construction Stormwater General Permit for Stratus Village. We have responded to each of her questions thus far and are waiting for formal issuance of the permit prior to the start of construction.

DEQ Comment:

2. Regarding Ecorisk forms/appendices A1 and A2—we've attached your version with a few comments embedded. There are also two additional attachments we are providing that are referenced within the comments to A1 and A2. Please resolve these comments and resubmit.

Response:

Please see the updated Appendices A1 and A2, which includes supplemental information as requested.

DEQ Comment:

3. *For the RSM—the information gap we have on this is related to sample location selection. The Phase II report provides a map of sample locations, but they look approximate and there's not information in text about how the locations were selected in the field. For example, was the grid mapped out? Were there GPS coordinates? Or were the centers of the conceptual grid cells measured off each other? What about the grass field and mound? Were sample locations just approximately evenly spaced about? This information can be provided at an attachment or in email text.*

Response:

The locations for the crop field samples collected were selected in general accordance with the systematic random sampling method recommended by DEQ and ITRC. The crop field was divided into a grid of 24 cells measuring approximately 100 feet by 120 feet. The first sample, C1, was located 50 feet east and 50 feet south of a survey marker in the northwest corner of the parcel using a measuring wheel. The locations of all subsequent crop field samples were repeated for each grid cell, with the exception of samples C21 and C22, which were shifted west approximately 25 feet to avoid being in

the grass field area. The locations for the grass field and mound samples were randomly selected but were biased towards representative coverage of each decision unit.

All samples were collected using a stainless-steel hand-auger with a 2 ¼-inch-diameter, 1-foot-long sample core. Surface vegetation at each location was first removed using a shovel, and the top 1-foot of soil at each sample location beneath the shallow root zone (1 to 2 inches) was collected by advancing the hand-auger to its full depth. The 1-to-2-foot intervals were sampled on a separate date and were located adjacent and within 2 to 3 feet of the initial sampling locations. Prior to collecting the 1-to-2-foot sample intervals, an approximately 10-to-12-inch diameter hole was cleared to 1-foot below the root zone using a shovel, and samples were collected from the base of the hole.

Sampled soils were removed from the sample core by hand and a representative wedge of each sampled interval was collected into clean, laboratory-supplied 4 oz jars to obtain the required mass of approximately 180 grams. Sampling equipment was decontaminated between each hole and new nitrile gloves were donned prior to the collection of the soil samples.

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DEQ Comment:

Lastly, while this is not a request for additional information, but rather a request for your group's preference on how to proceed, I wanted to document our conversation regarding the pesticide data gap on the mound area. In order to proceed with timely closure, we request either supplemental data to characterize pesticides in the mound or removal of the mound prior to site closure.

Response:

Due to ongoing regulatory consultation associated with the 24 CFR Part 58 process, we cannot yet perform any onsite work. Since that limits the option to remove any soils from the site, HAYC has hired Reynolds Engineering to perform additional testing to characterize the pesticides in the mound. The soil samples were collected May 30th, with results anticipated around Wednesday, June 5th. The soils at the mound will then be ultimately removed from the site when construction begins.