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Thursday, April 06, 2023

Oregon Department of Environmental Quality
Attn: Mr. Kevin Dana, Project Manager
Northwest Region Cleanup Program
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Subject: Response to ODEQ Comments for March 27, 2023, Draft Soil Cap Management Plan for Elk Ridge Estates in St. Helens, Oregon (ECSE #4857)

Dear Mr. Dana

EVREN Northwest, Inc. (ENW) presents this response to comments the Oregon Department of Environmental Quality (ODEQ) provide in its letter dated March 27, 2023. Below are ODEQ comments (shaded), with ENW's response below (unshaded).

ODEQ comments on Soil Cap Management Plan and ENW's Responses

- In Section 3.0, the Storm Water Channel is described as being 240 feet long. The *RD/RA Implementation Report* described the channel as being 450 feet long, with 16 rock check dams spaced 30 feet apart ($16 \times 30 = 480$). Please confirm the channel length.
 - ENW confirmed the length of the Storm Water Channel is 450 feet long and we have amended this in Section 3.0. Sixteen check dams are spaced 30 feet apart with a check dam at each end of the 450-foot channel.
- The SCMP includes a Signage Plan (Section 4.3) and an Annual Signage Review Form (Attachment C). DEQ does not intend to require the posting of warning signs as part of the Easement and Equitable Servitudes (EES) that will be recorded on the landfill and disposal cell parcels. As the soil caps are located in Homeowners' Association (HOA) common area, DEQ's expectation is that it is unlikely that anyone other than landscape or maintenance personnel will breach the soil cap.
 - ENW has changed the language in Section 4.3 to indicate that signage will not be required; however, the client may wish to post signage.
- Section 4.6. The 2nd sentence should read "The forms in Attachments A through C have been designed to document compliance on an annual basis."
 - ENW has made this change.
- Section 5.2. To clarify, the soil cap material, along with soil beneath the cap, must meet DEQ's clean fill criteria.
 - Understood. ENW has added language to clarify this in Section 5.2.

- On Figure 2, the Former Solid Waste Disposal Area should be labeled “FSWDA” instead of “FSEDA.”
 - ENW has made this change.

Should you have any questions related to any of our responses, or generally about this facility, please phone us at 503-452-5561 or email Lynn Green at LynnG@EVREN-NW.com.

Regards,

EVREN Northwest, Inc.

LYNN D. GREEN

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