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Wednesday, November 24, 2021

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

Subject: November 2, 2021 Comments on the Remedial Design/Remedial Action Work Plan for Elk Ridge Estates in St. Helens, Oregon (ECSI #4857)

Dear Mr. Dana:

On behalf of the Elk Ridge Estates (Elk Ridge), EVREN Northwest, Inc. (ENW) presents this response to comments the Oregon Department of Environmental Quality (ODEQ) provided in its letter dated November 2, 2021. Below are ODEQ's comments (shaded), with Elk Ridge's response below (unshaded).

ODEQ comments on RD/RA Work Plan and Elk Ridge's Responses:

As a general comment, DEQ reviewers noted that the abandoned solid waste landfill at the site is referred to by a variety of names in the RD/RA Work Plan and the attached figures and design drawings, including Tract E Open Space, Former Solid Waste Disposal Area (FSWDA), and Waste Area 1. The Upland Solid Waste Disposal Cell (USWDC) is also referred to by more than one name. Although historically accurate, the variety of names was confusing to individuals not familiar with the site. DEQ recommends mentioning the various names, as applicable, upfront, and then using one consistent name (for example, FSWDA) throughout the rest of the text, figures, and design drawings.

- ENW has modified the work plan as recommended.

The RD/RA Work Plan also makes several references to the "consolidation" of solid wastes in the FSWDA during regrading of the ravine fill slope, including a statement (in Section 3.2.2) that "[a]ll landfilled debris removed during construction will be consolidated onsite". To the extent that landfilled debris is removed during construction, the debris should be properly disposed of in an off-site Subtitle D landfill, rather than placed back into the ravine.

- ENW has clarified that solid waste that will be physically removed from the ground during implementation of this work will be disposal offsite at a Subtitle D landfill under an approved profile, and that the remaining solid waste will be reworked onsite during grading operations to accommodate placement of the soil cap.

Section 2.3. To clarify, DEQ does not anticipate that the Soil Cap Management Plan (SCMP) will include a requirement for warning signs. One of DEQ's goals in requiring capping of the disposal areas is to negate the need for fencing and warning signs.

- Noted, ENW has removed signage as part of the SCMP that will be prepared as part of this implementation.

Section 3.1.1. The Grading, Erosion & Sediment Control Details sheet (Sheet C038) is not included in the attached design drawings.

- The list of sheets included in the engineer's construction plans has been updated within this section, based on recent revision to these plans.

Section 3.1.1. Subsection (4) should specify that DEQ review and approval of the sampling data is required before imported fill can be placed at the site.

- Subsection 4b has been updated to state this.

Section 3.1.3. To clarify, fill from any source must meet Clean Fill standards if it is to be used as a soil cap. The data needed to demonstrate that the imported material meets Clean Fill standards may vary based on the source of the fill, but characterization data is needed for fill from all sources, including from on-site and commercial sources.

- As discussed by phone, ENW clarified this section, as well as Section 15, to state that soil derived from the adjacent Elk Ridge development project and/or aggregate/topsoil purchased from a commercial supplier will not require characterization; however, all other sources of imported fill will be characterized prior to importation.

Section 3.2.2. Please note and correct the following:

- Sheet C 166 and Figure 4 do not apply to the FSWDA Activities.
- In the Earthwork section, where/what is the "revised grading plan"?
- In the Installation of Storm Line section, replace "Figure x" with the appropriate Figure number.
 - ENW has made these corrections and referenced the construction sheets, as appropriate.

Section 3.2.3. Please note and correct the following:

- Sheet C 165 does not apply to the USWDC Activities.
- In the Earthwork section, where/what is the "revised grading plan"?
 - ENW corrected the reference to sheet C166.

Section 3 .3. Post-Construction tasks should also include removing temporary erosion and sediment controls, closing out permits, completing a final construction survey, and preparing as-built drawings.

- ENW added this information to this section.

Section 3.3. Post-Construction tasks should also include removing temporary erosion and sediment controls, closing out permits, completing a final construction survey, and preparing as-built drawings.

- ENW added this information to this section.

Section 3.4. Preparation of a Construction Summary Report should be included in the list of Post-Construction activities.

- ENW added this information to this section.

Section 15.0 should be changed to read "No additional sampling is anticipated, except to characterize imported fill soils."

- ENW added this information to this section and as previously mentioned this section was modified to clarify what soil would be characterized, if imported.

Section 16.0. Note that a second property survey will be needed at the conclusion of construction to document the as-built elevations.

- ENW added this information to this section.

Section 20.0. The monthly field reports should also identify any problems encountered and/ or deviations from the RD/RA Work Plan.

- ENW added this information to this section.

Figure 3. The cross-hatching for the New Storm Water Channel and the rectangular boxes representing check dams should be added to the legend. Note that the check dam locations on Figure 3 do not match the check dam locations on Sheet C165. Please correct.

- Figure 3 has been updated, as requested.

Sheet C010. Please note and correct the following:

- The first line of text should reference the RD/RA Work Plan in addition to the CMMP.
- Section 10.0 should reference "Waste Area 1" and "Waste Area 2" as shown on Sheet C000. See the general comment at the beginning of this letter.
- Section 10.2 should also include covering soils in the trucks and brushing loose soil off the trucks prior to leaving the site.
 - Sheet C010 has been updated, as requested.

Sheet C100. If rootwad removal and other soil disturbing activities, such as grubbing, are anticipated as part of the tree removal plan, then best management practices (BMPs) including silt fencing and a construction entrance should be included on this sheet, and the construction key notes should indicate that the BMPs will be installed prior to beginning work on the tree removal plan.

- Sheet C100 has been updated, as requested.

Sheets C150 and C160. The construction key notes for these sheets should specify that silt fencing and other BMPs will be installed prior to starting any intrusive/excavation activities in the plan detail area.

- Sheets C150 and C160 have been updated, as requested.

Sheet C166. The silt fencing line should run along the north side of Kestrel View Drive, south of Waste Area 2.

- Sheet C166 has been updated, as requested.

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

Regards,

LYNN D. GREEN

Lynn D. Green, C.E.G.
Project Manager

CC: Mark Zoller, Elk Ridge Development
Brooks Foster, attorney