



Oregon

Kate Brown, Governor

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TTY 711

November 2, 2021

Lynn Green
EVREN Northwest
PO Box 14488
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RE: Comments on Remedial Design/Remedial Action Work Plan
for Elk Ridge Estates in St. Helens
ECSI #4857

Lynn:

DEQ staff has reviewed the June 21, 2021 draft **Remedial Design/Remedial Action Work Plan** (RD/RA Work Plan) prepared by EVREN Northwest for the Elk Ridge Estates Development in St. Helens, Oregon.

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.

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.

DEQ offers the following specific comments on the RD/RA Work Plan:

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

- Section 3.2.2. Please note and correct the following:
 - Sheet C166 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.
- Section 3.2.3. Please note and correct the following:
 - Sheet C165 does not apply to the USWDC Activities.
 - In the Earthwork section, where/what is the “revised grading plan”?
- 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.
- Section 3.4. Preparation of a Construction Summary Report should be included in the list of Post-Construction activities.
- Section 15.0 should be changed to read “No additional sampling is anticipated, except to characterize imported fill soils.”
- Section 16.0. Note that a second property survey will be needed at the conclusion of construction to document the as-built elevations.
- Section 20.0. The monthly field reports should also identify any problems encountered and/or deviations from the RD/RA Work Plan.
- 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.
- 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 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.
- 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.
- Sheet C166. The silt fencing line should run along the north side of Kestrel View Drive, south of Waste Area 2.

Please incorporate DEQ’s comments into a final, signed and stamped *Remedial Design/Remedial Action Work Plan*, and provide one bound hard copy and one electronic copy of the plan to DEQ.

If you have any questions about this letter, please contact me at (503) 229-5369 or by e-mail at kevin.dana@deq.state.or.us. DEQ thanks you for your work on this project, and we look forward to implementation of the remedial action at Elk Ridge Estates.

Sincerely,

A handwritten signature in blue ink that reads "Kevin Dana". The signature is written in a cursive, flowing style.

Kevin Dana, Project Manager
Northwest Region Cleanup

cc: Mark Zoller, St. Helens Assets
Brooks Foster, Chenoweth
ECSI #4857 File