

DANA Kevin * DEQ

From: NELSON Heidi * DEQ
Sent: Wednesday, October 20, 2021 8:20 AM
To: DANA Kevin * DEQ
Subject: RE: Initial Comments on Elk Ridge RD/RA Work Plan
Attachments: Design Drawings.docx

Hi Kevin – I finished this review. They did a pretty good job on the Appendix A Plan set -the grading plan is really very good and it looks like it will perform as intended. They have a really high compaction requirement – I almost think it's unachievable...but it's their spec, and the more compact the better especially along the new storm water trench line – so I didn't comment on it, only on the analytical being submitted...

Take a look at the attached comments and pass along as you deem necessary. I wasn't sure about the approval for the fill – they say they don't have to test it if it comes "from a commercial source" – I disagree with this – term commercial is not the same as "clean" ...some yards take fill from lots of other sources, which can be approved for certain types of reuse...but this cover should meet clean fill standards, regardless of the source - so if that is something you have already discussed with them – or approved previously at this site, then, that is fine, but I commented on it in several places of the document – so please take a look at those comments if they need to be edited too.

Thanks for letting me review the plans – it was a fun package to review. Heidi

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Sent: Tuesday, October 19, 2021 12:35 PM
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Here's the link to it:

<V:\Kevin Dana's Project Files\4857 - Elk Ridge Estates Development\07 Health and Safety Plans\4857 Contaminated Media Management Plan.pdf>

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Hi Kevin – reviewing this now – and the drawings/plans reference the Contaminated Media Management Plan dated August 10, 2016 – do we have a copy of this document?

I poked through the file and it didn't jump out at me – let me know – thanks, Heidi

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Just scroll down to the RDRA Work Plan (draft) and the Remedial Design Drawings. Erin had also requested hard copies of the design drawings, which are available in the office if you'd rather look at those.

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Hi Kevin,
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RD/RA Work Plan:

General Comment - Please review the names designated throughout the RD/RA Work Plan and Design Plan, so the plans correlate to the information in the RD/RA Work Plan and are consistent throughout the document. Currently, there are multiple names for Waste Area 1, including Open Space Tract E, Tract E Open Space, Former Solid Waste Disposal Area (FSWDA) and Tract "B" and "E". A different set of names is used for Waste Area 2. This is confusing for individuals not familiar with the site.

Restoration only appears to consist of seeding following construction. The drawings reference the stormwater trench line as a swale. Please provide additional details for the restoration, including a planting plan, if applicable and, at a minimum, a seed mix and application rate for the hydroseeding.

Specific Comments:

- Section 3.1.1. Fill reused on-site should meet the State's Clean Fill Standards. Material brought to the site for fill is subject to DEQ's review for approval, regardless of the source.
- Section 3.1.3. The Grading, Erosion & Sediment Control Details (Sheet C038) is not included in the design drawings as indicated.
- Section 3.2.2. Please include restoration in this list of activities slated for the FSWDA.
 - First bullet - Sheet C166 does not apply to this section related to FSWDA activities.
 - Second Bullet – Figure 4 does not apply to this section related to FSWDA activities.
 - Third Bullet – Where is the "revised grading plan" provided as referenced here?
 - Fourth Bullet – Please replace "Figure X" with appropriate reference.
- Section 3.2.3 – Please update this section for the USWDC with the correct references, similar errors in references are shown in this section as indicated above for Section 3.2.2. Specifically, Sheet 165 is not related to the USWDC. This section also references a "revised grading plan, which is not apparent in any of the documents submitted to DEQ for review. Also, please include information related to restoration of this area following the earthwork activities to address the bare soil or reference Section 3.3.
- Section 3.3. The second bullet of this section is not clear, "seeding prepared, exposed soil areas". Other post-construction tasks also include removing temporary BMPs and closing out permits; completing a final construction survey to document site conditions, and preparing as-built drawings for reference during annual inspections.
- Section 3.4. Please check spelling in this section Through vs. Thought. Please include Construction Summary Reporting as component of post-construction schedule.
- Section 6.0. Imported fill requires a submittal of the source to Kevin Dana for his review for approval, regardless of whether the source is commercial or not. All fill reused on the site must meet DEQ's Clean Fill Standards.
- Section 15. Waste sampling, for waste soil and water, to determine disposition may also be required and should be identified in this section. As indicated in comments to Section 6. DEQ review for all fill sources is required. Material density/compaction testing is also required to meet the design criteria.
- Section 16. A final completion survey will be required to document the As-built elevations and to verify the final remedial action meets the design criteria/design grades.
- Section 20. Monthly field reports should also identify any problems encountered and/or deviations from the work plan and proposed or implemented resolution for any problems/changes encountered. The final construction completion report should consist of a

compilation of the monthly reports as well as all sample results collected as part of the remedial action work.

Tables:

Table 4-1. Additional tasks for Kevin Dana should also include approval of Fill source prior to transport to the site. Also, Kevin is the DEQ contact in the event any unanticipated contamination is encountered at the property during the construction; and he should be notified within 48 hours of any such discoveries.

Figures:

Figure 3. Please add criss-cross hatch for the new stormwater trench line to the legend. Along the stormwater trench line, there are rectangular features shown and there are also three of these located along Barrick Ln. Based on the detail included in Appendix A, these represent 18-inch check dams located at 25-foot centers; however, they appear to be misplaced on Figure 3. Please correct the locations and include the feature in the legend. Figure 3 should also show the proposed temporary silt fencing.

Figure 4. Should show the location of the temporary silt fencing.

Design Drawings:

Please provide a reference to the Final RD/RA Work Plan, in addition to the CMMP for this drawing set.

Sheet C010 –

- Section 2.0, #2.3 this item says "...have reviewed and signed the acknowledgement page of this plan..." No additional signature pages are included in the Design Drawing set. Is this referencing a form in the CMMP? If so, please also reference Item #16 so it is clear who will receive these forms.
- Section 3.0,
 - #7. This item identifies contacting a Project Manager; however, contact information for a Project Manager is not included in the design plans. Please provide a reference for this contact.
 - #10. The locations described under this section, including "Historic Landfill on Tract B Open Space", "Upland Solid Waste Disposal Cell", and "Tracts B and E" appear to be referenced as Waste Area 1 and Waste Area 2 on Sheet C000. Are these areas referenced correctly in Sheet C010? Where is the Tract B Open Space located?
 - #10.2. All trucks carrying hazardous waste should be lined and covered. Unlined trucks must undergo decontamination procedures following disposal. In addition, all trucks should be inspected and any loose soil should be broomed off the truck before it leaves the site.

C100 – If rootwad removal and other soil disturbing activities, such as grubbing, are anticipated during tree removal, then BMPs, including silt fencing and a construction entrance should be included on this figure and the BMPs should be installed before any intrusive work is completed.

C150 and C160 – The construction key notes should indicate that "BMPs should be installed prior to starting any intrusive/excavation activities in this work area". The locations of inlets with protection should be shown on these figures.

C166 – The silt fencing shown on this figure should be downgradient of the proposed cap area where disturbance might occur, including south of the line labeled “WST”, and north of Kestral View Drive. Please add this dotted hatch with outline to the legend. Please label the area where work will occur in this plan according to the areas identified in the RD/RA Work Plan.

C400 – Please provide the hyroseeding and/or restoration details to address the bare surface following the proposed constructions activities.

C038 – This plan referenced in the RD/RA Work Plan is missing.

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First (and least important), I wasn't anticipating placing warning signs around the solid waste disposal cell in the transmission line right-of-way. It's very unlikely that any digging or construction will be conducted atop the disposal cell, and adding warning signs would bring unnecessary attention to a small area that should just be left alone.

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I'll be back online and available by phone the last week of September. We appreciate your work in designing and implementing a remedy for the landfilled wastes at Elk Ridge Estates.

Kevin Dana
Cleanup Project Manager
Oregon Department of Environmental Quality
Northwest Region Office
700 NE Multnomah St., Suite 600
Portland, OR 97232-4100
Office: (503) 229-5369
Mobile: (503) 863-0779
Fax: (503) 229-6945
kevin.dana@deq.state.or.us

DANA Kevin * DEQ

From: DANA Kevin * DEQ
Sent: Tuesday, October 5, 2021 8:03 AM
To: MCDONNELL Erin K * DEQ
Cc: DANA Kevin * DEQ
Subject: RE: Initial Comments on Elk Ridge RD/RA Work Plan

Thanks Erin.

I'd have to check with Heidi, but if she's "super busy" I'm not sure she could get to this any sooner than you could.

At this point remedy implementation would be Summer 2022 at the earliest, so there's no time crunch in that regard. EVREN just wants some assurance that we agree with their conceptual plans. I'm not sure where they're at in terms of % design completion but I think it's still well under 50%.

Kevin

From: MCDONNELL Erin K * DEQ <erin.k.mcdonnell@deq.state.or.us>
Sent: Monday, October 4, 2021 3:52 PM
To: DANA Kevin * DEQ <kevin.dana@deq.state.or.us>
Subject: FW: Initial Comments on Elk Ridge RD/RA Work Plan

Hi Kevin,
Hope you had a stellar trip.

I have not been able to get to the RDRA plan review (which Kevin P is aware of). I know Heidi is super busy as well but wondering if she would take on the construction focused review. What do you think?

Best,
Erin

Erin McDonnell, P.E.
Cleanup Project Engineer
Oregon DEQ, NWR
503.229.6900

From: Lynn Green <lynng@evren-nw.com>
Sent: Monday, October 4, 2021 3:42 PM
To: DANA Kevin * DEQ <kevin.dana@deq.state.or.us>
Cc: MCDONNELL Erin K * DEQ <erin.k.mcdonnell@deq.state.or.us>
Subject: RE: Initial Comments on Elk Ridge RD/RA Work Plan

Kevin, for the last several weeks I have been working with the civil engineer to come up with a revised plan to:

1. Reduced the landfill export to the extent possible.
2. Reduced unsafe slopes.
3. Provide for a path for the storm from the upper reaches and from the adjacent roadway.
4. Maintain the storm line extension.

I believe we have an updated plan, but I need to run this by our client and the contractor. I will provide an update shortly, once confirmed. Thanks!

Lynn D. Green, Ph. D.
P.G./R.G./L.G./C.E.G./L.E.G.
Principal Engineering Geologist / Hydrologist
EVREN Northwest, Inc
Environmental and Natural Resource Consulting
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From: DANA Kevin * DEQ <kevin.dana@deg.state.or.us>
Sent: Wednesday, September 1, 2021 11:20 AM
To: Lynn Green <lynng@evren-nw.com>
Cc: DANA Kevin * DEQ <kevin.dana@deg.state.or.us>; MCDONNELL Erin K * DEQ <erin.k.mcdonnell@deg.state.or.us>
Subject: Initial Comments on Elk Ridge RD/RA Work Plan

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DANA Kevin * DEQ

From: Lynn Green <lynng@evren-nw.com>
Sent: Wednesday, September 1, 2021 11:34 AM
To: DANA Kevin * DEQ
Cc: MCDONNELL Erin K * DEQ
Subject: RE: Initial Comments on Elk Ridge RD/RA Work Plan

Thanks, Kevin (and Erin). I think your comments below will be easy to address. I will wait for Erin to send the final ODEQ comments before I start working on how best to proceed. Thanks!

Lynn D. Green, Ph. D.
P.G./R.G./L.G./C.E.G./L.E.G.
Principal Engineering Geologist / Hydrologist
EVREN Northwest, Inc
Environmental and Natural Resource Consulting
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