



Oregon

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May 6, 2013

PAUL TRONE
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Re: Additional Characterization Work Plan
Elk Ridge Estates, ECSI #4857

Paul:

DEQ staff reviewed the April 29, 2013 *Additional Characterization Work Plan* prepared by EVREN Northwest for the Elk Ridge Estates Development in St. Helens, Oregon. We are in general agreement with the plan to collect soil samples from 19 borings on seven lots at the development to determine residual impacts from separated soils associated with an abandoned landfill adjacent to the lots.

We have a handful of comments on the work plan which are listed below. Please prepare a final work plan incorporating our comments for review and approval prior to implementing the proposed work.

SPECIFIC COMMENTS

- On Page 2, you list Lots 15 through 22 in Phase 2 Parcel #4 as not being of concern. DEQ does have some concern with these Lots, given their proximity to the landfill and their potential use as staging areas during the landfill excavation and separation activities. The proposed sampling on Lots 1 through 7, which are more heavily impacted, will provide a strong indication as to the likely impacts on Lots 15 through 22.
- The Analysis Plan on Page 11 shows sampling for only two metals, arsenic and lead. All metals should be analyzed for.
- The Analysis Plan shows sampling for total petroleum hydrocarbons by NWTPH-HCID. DEQ presumes that appropriate follow-up analyses (e.g. NWTPH-Dx and NWTPH-Gx) will also be conducted if TPH is detected by the HCID method.
- The Analysis Plan shows sampling only for "Chlorinated Persistent Pesticides". Analysis for chlorinated herbicides and organophosphorus pesticides should also be considered.
- The Analysis Plan does not include sampling for PAHs. At the very least, PAHs should be analyzed for if the presence of diesel- or residual-range organics are indicated by the HCID method.

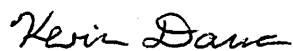


Elk Ridge Estates Development
Additional Characterization Work Plan
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- Figure 3 shows Perry Creek bordering the Elk Ridge Estates Development to the west and south. DEQ's understanding, from the topographic map (Figure 1) and other sources, is that Milton Creek runs west to east along the south side of Hankey Road. Perry Creek runs north to south along the west edge of Elk Ridge Estates.

I can be reached at (503) 229-5369 or by e-mail at dana.kevin@deq.state.or.us if you would like to discuss our comments prior to finalization of the *Additional Characterization Work Plan*. We thank you for your work on this project.

Sincerely,



Kevin Dana, Project Manager
NWR Cleanup Section

cc: Dan Hafley, DEQ
Kevin Parrett, DEQ
Mark Zoller, St. Helens Assets LLC

(kpd:KPD)