

Response to Oregon DEQ Comments
Permapost Interim Remedial Action Measures Work Plan
August 9, 2024

+ID No.	Section Name/Topic	OR DEQ Comment	Response
1 – General Comments	General Comments	The IRAM WP does not require analysis of remedial options or reference to remedial options included in the Feasibility Study (FS) currently under review. The IRAM WP should focus solely on the IRAM work being proposed at Property 1. DEQ recommends removal of Section 3, Table 3-1, and the Cost Estimates Appendix.	Previously provided Section 3, Table 3-1, and the Cost Estimates Appendix were removed.
1 – General Comments	General Comments	The IRAM WP proposes transporting excavated soil from Property 1 to the Permapost property for disposal, but lacks critical information about how the soil would be handled or temporarily managed on the Permapost property. Until DEQ selects a final remedy for the Permapost property, any storage or staging of excavated soils on the Permapost property is temporary. Please note waste determinations may require designation of a Corrective Action Management Unit (CAMU) prior storage or staging of excavated soils on the Facility. DEQ does not approve temporary placement of excavated soil in areas containing potential hot spots (i.e., the RCRA impoundment, DU-G, and DU-H). DEQ would consider approval of temporary or permanent placement of excavated soil in DU-F. Permapost must place a demarcation layer between the existing ground surface and temporarily placed soils, and manage soils in a manner that prevents contaminants of concern (COC) migration via dust or stormwater and protects on-site workers from exposure to COCs. Revise the IRAM WP to include detailed procedures for transporting soil to the Permapost property and temporarily managing soils pending selection of a final remedy. The IRAM WP should support these details by identifying the proposed temporary soil staging area, drawing details illustrating demarcation layers and soil covers, and propose monitoring to demonstrate that temporary soil stockpiles management measures remain effective.	Details pertaining to soil handling/management on the Permapost property have been added in Section 4.2.3.3, Permapost Property Soil Management and Design Drawings in Appendix B. Contaminated soil stockpile details are included on Sheet C1.2 of the Design Drawings.
1 – General Comments	General Comments	The IRAM WP leaves a lot of details to be confirmed or developed based on pre-design activities (several of which were reportedly completed in September 2023, and proposes submitting new information (design drawings) at least a week before providing the detailed property-specific cleanup plan to the homeowner. These details include further assessment of structures (e.g., sheds), vegetation (e.g., trees), and areas that may pose equipment access. DEQ is unclear why the IRAM WP does not present available pre-design information and present a plan for these specific factors based on the existing information. Review the IRAM WP to include more detailed drawings.	Additional design details have been added to Section 4 and Design Drawings are included in Appendix B.
2 – Specific Comments	Section 1 Introduction	Remove reference to the FS and revise for the IRAM WP to be a standalone document as the FS has not been approved by DEQ. DEQ previously established the site-specific dioxin/furans preliminary remediation goal (PRG) for residential soils of 11.8 nanograms per kilogram (ng/kg) based on the maximum dioxin/furans TEQ concentration measured in topsoil source material samples unrelated to the FS.	References to the Feasibility Study have been removed from Section 1. A description of PRGs is provided in Section 2.2, Preliminary Remediation Goals.
3 – Specific Comments	Section 4.2	a) The first bullet describes temporarily stockpiling excavated soil on DU-G pending final remedy implementation. DEQ does not approve temporary placement of excavated soil on portions of the Permapost property containing potential hot spots, including DU-G.	a) Based on conversations with DEQ on July 10, 2024, DEQ will approve of temporary placement of excavated soil on DU-G given 1 foot of gravel is placed beneath the stockpile as a demarcation layer. b) Details pertaining to backfill were added to Section 4.2.5.1, Backfill.

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	Interim Remedial Action Components	b) Provide additional details on backfill such as type, lift placement thickness, and compaction requirements. c) Provide a figure showing Property 1 features including utilities, any large trees or vegetation to be left in place, areas with limited equipment access, permanent structures, and structures to be relocated/removed. The figure should also identify areas where structural setbacks or side slopes are necessary. DEQ needs to fully understand what areas of the property will be excavated or not. DEQ understands a private utility locate, arborist survey, and land survey of Property 1 were performed in September 2023. d) DEQ will determine if a deed restriction or other controls are required for Property 1 based on the implementation success of the IRAM and the FS. While the IRAM is intended to be the final remedial action, no guarantees should be made to the property owner that a deed restriction or other controls will not be required by DEQ.	c) Design drawings that incorporate the requested elements are included in Appendix B. d) Text regarding deeds restrictions has been removed.
4a – Specific Comments	Section 4.2.1 Remedial Action Approach	a) Indicate which surveys have already been performed. b) If structures such as fencing, sheds, or gazebos can not be moved without damaging than Permapost must also consider replacement. c) How will the deck be approached? d) Several trees are expected to remain on the property. Excavation to the full depth is unlikely within the drip line of these trees. How will these areas be managed post excavation? In addition to avoid exposure to pests or other hazards, the areas within the tree drip lines should be backfilled immediately with some volume of soil. e) Include information on the means and methods of removal, backfilling, and contaminated soil management. f) Include a table summarizing all of the proposed construction quality assurance measures. g) The structural engineer should also provide instructions on how to safely excavate around the foundation.	a) Topographic and vegetation surveys have been conducted at Property 1 as described in Section 4.2.1, Site Preparation. These surveys are incorporated in the Design Drawings in Appendix B. b) Text has been incorporated in Section 4.2.1, Site Preparation, and Section 4.2.5, Site Restoration, to describe the potential removal and replacement of structures. c) The deck will be demolished to facilitate soil excavation and restored, as noted in Sheet C1.0 of the Design Drawings (Appendix B). d) Section 4.2.2, Vegetation Management, describes vegetation management, including procedures for excavation around critical root zones. Sheet C2.0 in the Design Drawings (Appendix B) identifies trees to remain on the property. e) Details pertaining to the means and methods of removal, backfilling, and contaminated soil management were included in Section 4.2.3, Soil Management, and Section 4.2.4, Post-Excavation Evaluation. f) Proposed construction quality assurance measures are included in Section 4.4, Construction Quality Assurance Measures. g) This has been incorporated in Section 4.2.1, Site Preparation and Sheet C2.1 of the Design Drawings.
4b – Specific Comments	Section 4.2.2 Restoration Approach	Restoration also includes the return or replacement of features removed or damaged during excavation. Please revise section.	Section 4.2.4, Post-Excavation Evaluation, was revised to include discussion of return or replacement of features removed or damaged during excavation.
4c – Specific Comments	Section 4.4 Schedule	a) Recommend revising “property owner cooperation” to “property owner negotiations”. b) Design drawings detailing the property-specific remedial action plan are required to be included in the revised work plan.	a) Section 4.5, Schedule, was revised to use “property owner negotiations.” b) Design Drawings are included in Appendix B.

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		c) The technical memo documenting the IRAM should include pre-excavation, post excavation, and finished grade drawings. d) No mention of testing import fill was made in the work plan until this section. If testing of backfill will be performed, an additional section to the IRAM WP is required detailing sampling actions and analytical program. If this reference means inclusion of test results already documented in other technical memos, then these results should not be included. e) The technical memo must also include photos of work performed that show before, during, and post excavation conditions and contaminated soil pile location and conditions.	c) Section 4.6, Reporting, was revised to specify inclusion of pre-excavation, post-excavation, and finished grade drawings. d) Topsoil will be obtained from regional commercial vendors previously evaluated during the topsoil source sampling effort conducted in 2023 or otherwise approved by DEQ. Additional text has been included in Section 4.2.5.1, Backfill. e) Reporting Section 4.6, Reporting, was revised to specify inclusion of photographs.
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