



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

August 19, 2024

Jayne Bond
Permapost Products Inc.
P.O. Box 100
Hillsboro, OR 97123

via electronic delivery (email)

Subject: Interim Remedial Action Measures Work Plan
Permapost Products, ECSI No. 148

Dear Jayne Bond:

The Oregon Department of Environmental Quality has reviewed the *Interim Remedial Action Measures Work Plan* (IRAM WP) dated August 9, 2024. Maul Foster & Alongi, Inc. prepared the IRAM WP on behalf of Permapost Products, Inc. The IRAM WP details proposed actions to address arsenic and dioxin/furans soil contamination at the residential property located at 3975 Witch Hazel Rd in Hillsboro, Oregon (Property 1). DEQ has the following comments.

Specific Comments

- 1) **Section 1, Introduction.** The last sentence states that the proposed IRAM will include consolidation and capping of contaminated soil on the adjacent Permapost property. DEQ clarifies that the IRAM includes consolidation and temporary stockpiling of contaminated soil on the adjacent Permapost property. Capping of contaminated soils is subject to DEQ's remedy selection process.
- 2) **Section 4.2, Interim Remedial Action Components.** The first bullet states that soils will be capped on the Permapost property. DEQ clarifies that the soil will be temporarily stockpiled pending DEQ's selection of a final remedial action.
- 3) **Section 4.2.1, Site Preparation.** DEQ has the following comments:
 - a) The first paragraph states that utility locating will be conducted prior to the IRAM. However, the work plan does not discuss how utilities will be managed during the IRAM. The Drawing C1.0 in Appendix B shows many existing subsurface utilities (e.g., natural gas, water, storm drains) that may be located within the proposed excavation depths. Please describe how utilities will be managed during the IRAM.
 - b) The last sentence of the first paragraph states that fence panels that impede IRAM activities may be temporarily removed to facilitate cleanup and replaced following completion of the IRAM. The Drawing C1.0 in Appendix B suggest that Permapost plans to only remove select fence panels adjacent to the Permapost property as needed for construction equipment access. Detail D on sheet C2.1 reflects a plan to leave potentially contaminated soils in-place in order to work around fence panels. Please clarify whether fence panels will be temporarily removed and replaced to facilitate cleanup. If not, then clarify why an offset and side slopes are necessary to protect the fence panels.

- 4) **Section 4.2.3. Soil Management.** Please clarify how excavated soils will be transported to the Permapost property. Section 4.2.3.1 suggests that trucks will be loaded and travel over the road to the Permapost property. However, the Drawings suggest that Permapost plans to transport excavated soils across the shared property boundary (i.e., not drive trucks on the road).
- 5) **Section 4.4, Construction Quality Assurance Measures.** The proposed construction quality assurance (CQA) activities are non-descript and appear incomplete. DEQ has the following comments:
 - a) At minimum, the work plan should identify the remedial action component, applicable design criteria/requirement, and the type, method, and frequency of CQA activities. For example, the last bullet states “verification of soil backfill over excavation area” but does not indicate whether backfill will be placed in lifts, how backfill will be compacted, how compaction will be verified, how frequently compaction will be verified, and what methods will be used to ensure the final grade is restored.
 - b) CQA activities must include ongoing inspection and maintenance of soil stockpile covers and erosion controls. The work plan should include information about how frequently the stockpile cover will be inspected and that any repairs to the cover will be implemented promptly.
- 6) **Appendix B, Drawing C1.0 (Existing Conditions & Demolition Plan).** DEQ has the following comments:
 - a) Drawing C1.0 shows the temporary demolition of the existing stormwater berm on Permapost’s property to provide construction access. The work plan does not discuss the temporary removal or reconstruction of the stormwater berm. Please provide additional information about how the berm will be demolished and how it will be reconstructed.
 - b) Several symbols are shown on Drawing C1.0 that are not defined on Drawing C0.1.
- 7) **Figures & Drawings.** Include the corrected Figure 2-1 and Appendix A Figure 1 and the resized drawings in the revised work plan.

Thank you for your continued efforts and responsiveness in addressing concerns about off-site migration of contamination. Please contact me at 503-860-3943 or by email at Katie.Daugherty@deq.oregon.gov if you have any questions.

Sincerely,



Katie Daugherty, R.G.
Project Manager
Cleanup Section
Northwest Region

ecc: Wes Thomas, DEQ
Tim Browning, Permapost
Phil Wiescher, MF&A
Jim Maul, Gemini Environmental Strategies