From: MILLER Sarah * DEQ
To: DIGIUSTINO Rebecca * DEQ; SCHATZ Jeff * DEQ
Subject: RE: NE Marx/Savage Site - PPA Implementation (1460-23001-07)
Date: Monday, July 15, 2024 8:04:09 AM

Thanks Rebecca-

FYI- the Lead discrepancy between Solid Waste Program Clean Fill Determination Background(updated 2019) and Cleanup Program metals Background(updated 2018) was identified awhile back, but I don't know where or if this is in the queue to identify, explain or update(if needed) at Cleanup HQ.

Is another one of those items that would be nice to update for Slough SLVs but will need to happen during the comprehensive SLV update via an ESD update at some point in the distance future. At this point going with the lead background of 79mg/kg is accurate for the slough.

From: Lynn Green <lynng@evren-nw.com>
Sent: Friday, July 12, 2024 11:29 AM
To: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>; SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Evan Bruggeman <evanb@evren-nw.com>; Paul Trone <pault@evren-nw.com>; MILLER Sarah * DEQ <Sarah.MILLER@deq.oregon.gov>
Subject: RE: NE Marx/Savage Site - PPA Implementation (1460-23001-07)

No worries. Actually, the concentration in the Phase II that we use is the Clean Fill Screening Level that is used for Solid Waste, which is 28 mg/Kg. Thanks for this information. I will wrap up the changes to the work plan and get to you today or Monday at the latest. Lynn

Lynn D. Green, Ph. D.
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From: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>
Sent: Friday, July 12, 2024 10:56 AM
To: Lynn Green <lynng@evren-nw.com>; SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Evan Bruggeman <evanb@evren-nw.com>; Paul Trone <pault@evren-nw.com>; MILLER Sarah * DEQ <Sarah.MILLER@deq.oregon.gov>
Subject: RE: NE Marx/Savage Site - PPA Implementation (1460-23001-07)

Hi Lynn,

Thank you for bringing this up. DEQ wasn't requiring you cleanup to a standard below background, it was a request to analyze the samples for lead and if lead exceeding background, to consider it when determining the excavation limits. However, I made this comment based on the tables provided in the Phase II report for the site and upon closer look, the background listed for lead in Table 1 is actually for the South Willamette Valley (28 mg/kg) and not the Portland Basin (79 mg/kg). I should have double checked the table value against the fact sheet, so with that information, you can disregard the DEQ comment regarding analyzing for lead.

Thanks,

Rebecca Digiustino
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From: Lynn Green <lynng@evren-nw.com>
Sent: Friday, July 12, 2024 8:45 AM
To: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>; SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Evan Bruggeman <evanb@evren-nw.com>; Paul Trone <pault@evren-nw.com>; MILLER Sarah * DEQ <Sarah.MILLER@deq.oregon.gov>
Subject: RE: NE Marx/Savage Site - PPA Implementation (1460-23001-07)

Rebecca, I am not sure I agree with this comment. Can you provide more basis for this being required?

- Because elevated lead concentrations were identified in previous sediment samples collected from the stormwater ponds (54.3 mg/kg in the west pond and 37.9 mg/kg in the east pond), sediment samples should also be analyzed for lead and lead concentrations should be considered when determining the termination of the excavation.

The concentration of lead is below the background concentration of lead in the Portland Basis, so ODEQ is basically requested that we cleanup to a standard below background. Since sediment in the pond area is likely derived from entrained surface soil in storm water sheet flow, the lead concentrations are likely related to lead in this surface soil. This is very typically of sediment in most storm-water quality structures. Let me know your thoughts. Otherwise, I have address all you other comments and can send an updated work plan. Lynn

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From: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>
Sent: Wednesday, July 10, 2024 12:06 PM
To: Lynn Green <lynng@evren-nw.com>; SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Evan Bruggeman <evanb@evren-nw.com>; Paul Trone <pault@evren-nw.com>; MILLER Sarah * DEQ <Sarah.MILLER@deq.oregon.gov>
Subject: RE: NE Marx/Savage Site - PPA Implementation (1460-23001-07)

Hi Lynn,

Oregon Department of Environmental Quality (DEQ) has reviewed the work plan titled *Sediment Removal and Confirmation (East and West Ponds) Work Plan* (work plan*)* submitted on June 11, 2024, on behalf of CRP/Crest Salvage and Marx Owner, LLC (CRP). DEQ has prepared the attached comments based on the work plan. Please prepare a revised work plan for DEQ review by August 9, 2024 and let me know if you have any questions.

Thank you,

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From: Lynn Green <lynng@evren-nw.com>
Sent: Tuesday, June 11, 2024 7:51 AM
To: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>; SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Evan Bruggeman <evanb@evren-nw.com>; Paul Trone <pault@evren-nw.com>
Subject: NE Marx/Savage Site - PPA Implementation (1460-23001-07)

Rebecca and Jeff, attached is our work plan for sediment removal in the east and west ponds. We are hoping to schedule this work in the next month or so, to take advantage of the dryer weather. So, please let us know if this work plan is approved as soon as possible. Let me

know if you have any questions or comments on this work plan. Thanks! Lynn

Lynn D. Green, Ph. D.
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From: Lynn Green
Sent: Tuesday, March 26, 2024 10:10 AM
To: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>; SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Evan Bruggeman <evanb@evren-nw.com>; Paul Trone <pault@evren-nw.com>
Subject: NE Marx/Savage Site - PPA Implementation (1460-23001-06)

Rebecca and Jeff, attached is our work plan for the installation of a passive ventilation system (as part of building renovations work) followed by initial indoor air evaluation. We are hoping to start this work with the next couple months (exact timing would be based on when building renovation work is to start). Please let us know if you have any questions or comments on this work plan. Thanks!

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From: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>
Sent: Tuesday, March 5, 2024 8:46 AM
To: Lynn Green <lynng@evren-nw.com>; SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Evan Bruggeman <evanb@evren-nw.com>
Subject: RE: NE Marx/Savage Site - PPA Implementation (1460-23001-09)

Thanks for the update, Lynn.

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From: Lynn Green <lynng@evren-nw.com>
Sent: Tuesday, March 5, 2024 8:45 AM
To: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>; SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Evan Bruggeman <evanb@evren-nw.com>
Subject: RE: NE Marx/Savage Site - PPA Implementation (1460-23001-09)

Rebecca, just FYI, the drillers had to postpone the MW decommissioning this week and have rescheduled this work for 3/18-19. FYI

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From: Lynn Green
Sent: Tuesday, February 27, 2024 4:35 PM
To: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>; SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Evan Bruggeman <evanb@evren-nw.com>
Subject: RE: NE Marx/Savage Site - PPA Implementation (1460-23001-09)

Rebecca, just so you are in the loop, we just confirmed with our well driller that the MW decommissioning is scheduled for 3/6 and 3/7. Just FYI

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From: Lynn Green
Sent: Tuesday, February 27, 2024 9:06 AM
To: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>; SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Evan Bruggeman <evanb@evren-nw.com>
Subject: RE: NE Marx/Savage Site - PPA Implementation (1460-23001-09)

Thanks, Rebecca. Regarding the SCE and monitoring, I was only wanting the clarify what will need to be monitored since I am starting the preparation of the work plan. Currently, there is no tenant and as such there is no 1200-Z permit, and it is not currently known if a new tenant would be required to get this permit, since it would depend on whether they have significant industrial exposure to storm water. But this is good to know, and I will include both outfalls in

the SCE work plan to be monitored. We already anticipated provided ODEQ with all the storm calculations.

Regarding the monitoring wells, our client has elected to remove all the MWs, since he fears they would be damaged during site redevelopment work. This work is scheduled for next month and we will provide ODEQ with a report that documents this work. I just wanted to make sure you did not need any additional data related to the PFAS testing we did before these wells were removed.

Over the next month or so, we will be sending the CMMP and well as a couple work plans for your review, in addition to the report described above. Just FYI. Thanks, Rebecca!

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From: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>
Sent: Monday, February 26, 2024 4:35 PM
To: Lynn Green <lynng@evren-nw.com>; SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Evan Bruggeman <evanb@evren-nw.com>
Subject: RE: NE Marx/Savage Site - PPA Implementation (1460-23001-09)

Hi Lynn,

About the new system: Yes, we typically require stormwater sampling of the new system to confirm it meets DEQ source control requirements, since the City storm sewer still discharges to the Slough. Sites usually conduct the sampling in conjunction with the City's NPDES 1200z permit and just expand the analyte list to encompass the additional DEQ required analytes. Additionally, DEQ would like to review the proposed plans for the new system, including the design storm criteria used to size the stormwater system (i.e., typical designs consider a minimum 2-year, 24-hour storm event), the estimated volume of runoff that will be directed to the stormwater system during the design storm, the design flow rate into the system, and the total storage volume of the system, etc.

For the monitoring wells: during our meeting to discuss the PFAS results, I believe we agreed that it made sense for the wells to be decommissioned due to the redevelopment. However, DEQ requested that if MW01 (located east of the building) can be preserved, DEQ would prefer that but understood that development may require that well to be decommissioned also.

Please let me know if you have any questions or would like to discuss these topics more.

Rebecca Digiustino

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From: Lynn Green <lynng@evren-nw.com>
Sent: Friday, February 23, 2024 11:53 AM
To: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>; SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Evan Bruggeman <evanb@evren-nw.com>
Subject: RE: NE Marx/Savage Site - PPA Implementation (1460-23001-09)

Also, can you decommission the monitoring wells that were installed for the PFAS testing? We do not want them to be damaged during site improvements, so hoping to do that work next month.

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From: Lynn Green
Sent: Thursday, February 22, 2024 2:59 PM
To: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>; SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: Evan Bruggeman <evanb@evren-nw.com>
Subject: NE Marx/Savage Site - PPA Implementation (1460-23001-09)

Rebecca and Jeff, now that the PPA has been recorded, I have been tasked with developing work plans for the implementation of the PPA SOW. One of the tasks is related to sediment removal of the onsite ponds with subsequent source control evaluation. I was just provided a DRAFT figure from our clients' civil engineer (attached) related to storm water improvements on the NE Marx site. As you can see, since there is not adequate capacity in the existing storm water line to Johnson Lake, they intend to develop two new flow-through planters (for water quality, no infiltration) with pumped discharge to the storm sewer in NE Marx. They will not be utilizing the existing ponds, so those will remain unchanged. As part of our work plan, we plan to remove sediment in these existing ponds with restoration following sediment removal, and then monitoring discharge to Johnson Lake following completion of that cleanup work, as outline in the SOW of the PPA. Can I assume that the only storm water monitoring that will be required related to these existing ponds (the discharge to Johnson Lake), and we will not need

to include discharge from this new storm water system, since that discharge is unrelated to these ponds? Just wanted to confirm. Thanks!

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