From:	Mark Havighorst
To:	SCHATZ Jeff * DEQ
Cc:	DIGIUSTINO Rebecca * DEQ; Greg Williams; Chris W. Breemer
Subject:	RE: Responsiveness Survey for Response to DEQ Comments on VI Work Plan-Temco Site (1148)
Date:	Wednesday, June 19, 2024 12:58:39 PM

Hello Jeff,

Thanks for your reply.

Temco will implement the proposed investigation consistent with the work plan and DEQ's June 5, 2024 comments. Temco will review the results of the planned investigation and groundwater data collected by EPA before committing to any additional vapor intrusion investigation .

We are reaching out to drillers to coordinate the investigation field work and will inform DEQ of the sampling schedule as soon as it has been determined. In the interim, please let me know if you have any questions.

Thanks

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From: SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Sent: Tuesday, June 4, 2024 5:14 PM
To: Mark Havighorst <mhavighorst@geoengineers.com>
Cc: DIGIUSTINO Rebecca * DEQ <Rebecca.Digiustino@deq.oregon.gov>; Greg Williams <gregw@temcousa.com>; Chris W. Breemer <cbreemer@geoengineers.com>
Subject: Responsiveness Survey for Response to DEQ Comments on VI Work Plan-Temco Site (1148)

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Mark-

The Department of Environmental Quality (DEQ) has received and reviewed the GeoEngineers, Inc. (GeoEngineers) letter of May 28, 2024, providing responses to DEQ comments on the (draft) Vapor Intrusion Investigation Work Plan (VI Work Plan) and the Vapor Intrusion Investigation Work Plan (Revised VI Work Plan) dated June 3, 2024. DEQ appreciates the

efforts of Temco and GeoEngineers to address DEQ's concerns regarding the proposed soil vapor investigation. Generally consistent with discussions during the April 18, 2024 meeting, the work plan reflects a phased approach to the investigation in that the results of the investigation will inform next steps.

DEQ generally finds the Response to Comment (RTC) and Revised VI Work Plan acceptable with the following exceptions:

1. Response to DEQ Specific Comment 11 – The RTC states that soil vapor samples will be collected from a depth of 5 feet below ground surface (bgs). However, section 5.3.1 of the Revised VI Work Plan suggests that the planned collection depth is 5.5 feet bgs. DEQ notes similar contradictory language in Section 5.2 of the Revised VI Work Plan. Please clarify the intended depth of collection for soil vapor samples.
2. Please move VP-2 (i.e., most easterly of proposed soil gas sampling points along SE Mather Road) east to be nearer to MW-41, which has historically contained among the highest detected concentrations of Trichloroethylene (TCE) in groundwater samples.
3. The building immediately north of SE Mather Road and immediately east of SE 98th Court appears to be an office. Please add one additional soil gas sampling point along SE Mather Road adjacent to this building.
4. DEQ acknowledges the rationale in targeting the dry season to attempt to represent the worst-case conditions and that work is being done in a phased approach. However, DEQ will not prematurely rule out the need for additional samples collected at other times of the year if necessary to fully characterize soil gas impacts and potential risks posed to workers at the RS Davis and Columbia Manufacturing properties.

Conditional upon adherence to the comments herein provided, DEQ approves the Revised VI Work Plan. It is not necessary to revise and resubmit the Revised VI Work Plan. DEQ continues to coordinate with EPA concerning when the groundwater data for wells installed on the Northwest Pipe & Casing Superfund site in 2023 will be made available to the public. DEQ looks forward to reviewing data from the soil gas investigation to inform future decision on the need for additional investigations and complete the Remedial Investigation.

Please let me know if you have questions in the meantime. Respectfully,

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