Oregon
John Kitzhaber, MD, Governor

Department of Environmental Quality
Northwest Region
2020 SW 4th Avenue, # 400
Portland, OR 97201-4987
(503) 229-5263
FAX (503) 229-5471

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Rich Muza
Oregon Operations Office
EPA Region 10
806 SW Broadway, Suite 500
Portland, OR 97205

Re: EPA Comments on DEQ Source Control Decision
Centennial Mills
ECSI # 5136

Rich:

Thank you for your comments on DEQ's December 19, 2013 draft ***Source Control Decision*** (SCD) for the Centennial Mills site. EPA comments are presented in a letter dated January 29, 2014 and submitted to DEQ. The SCD has been revised to address both your comments.

A brief response to your comments is presented below.

General Comments

1. Impacts at the MW-2 location cannot be separated at this time from those identified in nearby Tanner Creek Sewer (TCS) backfill. Both will be addressed in the TCS "carve out" discussed in the SCD. Information has been added to the SCD regarding the process and timeline for evaluating petroleum impacts found around the Tanner Creek Sewer, which will be assessed separately from the Centennial Mills SCD.

2. See response for Comment 1 above. EPA and other interested parties will be provided with additional information when this effort is complete.

3. DEQ acknowledges that some of the analytical detection limits are above relevant screening values; however a reasonable attempt was made to achieve practical quantitation limits (PQLs). DEQ has requested that the PDC attempt to address the concerns outlined by EPA, and a response is provided below in italics. Independent of the PDC response, we are confident in the final SCD conclusion that the Centennials Mills site does not present a significant current or future recontamination concern.

   In order to best achieve JSCS SLVs, samples for the source control evaluation were submitted to Apex Labs in Tigard, Oregon. Apex Labs was selected as the analytical laboratory for this project as they are an ORELAP-accredited laboratory and have PQLs that

are consistent with the industry and generally meet SLVs. SIM analyses were used for all PAH and phthalate analyses to achieve lower PQLs. PCB analyses include sulfuric acid, sulfur, and florisil cleanups. Metal analyses were by EPA Method 6020 using ICPMS. Additionally, to provide a better indication of whether a given contaminant may be present in environmental media at the site (especially for contaminants with PQLs above SLVs), we requested that Apex report method detection limits (MDLs) for all contaminants. MDLs are presented in the tables of the report and, although they represent estimated concentrations, can provide an indication of whether a contaminant is present. When evaluating the data for the SCE, the analytical data set in its entirety was considered to identify and determine whether a given contaminant was present at the site.

Specific Comments

1. The reference has been modified as suggested.

2. Regarding Attachment 5c, the SCD text refers to this as the soil sampling results in the north catch basin area. The EPA requested insertion of a stormwater figure for Attachment 5c; however, such a figure is better suited in Attachment 5d which includes the stormwater data. Therefore, the requested figure has been added to Attachment 5d.

A final SCD document (electronic) will be forwarded to you and other relevant parties including Tribes for your records. Please do not hesitate to contact me (503-229-5417) or Matt McClincy if you have any further questions or comments about the Centennial Mill SCD.

Respectfully,

Daniel Hafley, RG
Senior Project Manager/Hydrogeologist

Cc: Matt McClincy, DEQ
Colin Polk, PDC
Rick Ernst, Hart Crowser