

Comments and Responses

Document: Highway 101 Former Mill Site (former Wheeler Lumber Mill), Wheeler, Oregon

Com#	Section #	USEPA Comment	C,D, E ¹	Response	A or D ²
1.	A7, Page 9	Add the EPA QA Manager Cindy Fields to the QAPP revision distribution list	C	EPA QA Manager Cindy Fields has been added.	
Com#	Section #	Oregon DEQ Comments	C,D, E ³	Response	A or D ⁴
1	General	The SSQAPP proposes to investigate contaminants of concern (COCs) identified during the 2017 Phase II investigation by Parametrix. However, DEQ has revised human health and ecological Risk-Based Concentrations (RBCs) since 2017. The data collected from the 2017 Parametrix investigation does not appear to have been screened against current RBCs or regional default background concentrations for metals in soil for the Coast Range. DEQ recommends screening 2017 data against current RBCs for the contaminants detected as the screening values have been revised or added for some chemical compounds that might necessitate additional assessment. Example, TPH in groundwater collected from sample location BM-B-1 was detected at 3,380 ug/L which exceeds both residential and occupational RBCs for the ingestion and inhalation of tapwater and the groundwater vapor intrusion to indoor air exposure routes.	C	A comment has been added on page 2 that past environmental data collected by Parametrix and data to be collected by Terraphase will be compared to the current ODEQ RBCs and the regional default background concentrations for metals in soil for the Coast Range. An additional soil boring will be advanced in the area of B-1 to investigate current soil and groundwater conditions in this area.	
2	General	The 2017 Parametrix investigation collected one soil sample from a depth of 1-foot below ground surface (bgs) for dioxins/ furans analysis in the area of the former burn pit (BM-B-7). Although the analytical results were below the most conservative RBC, one discrete sample is likely insufficient for characterizing this area based on the size and distribution of the burn pit. DEQ recommends additional investigation of the former burn pit area for dioxins/furans. DEQ also recommends use of multi-increment sampling methods for assessing surface soils in this area.	C	In an effort to better investigate the possibility of dioxin/furans impacts in burn pit soil sampling will be conducted in this area following incremental sampling methodology. A total of 3 samples will be submitted (i.e. one primary and two duplicate samples) from 30 subsamples of material from depths up to 1 foot below ground	

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¹ C = Concur; D = Disagree; E= Takes exception.

² A = Agree; D= Disagree

³ C = Concur; D = Disagree; E= Takes exception.

⁴ A = Agree; D= Disagree

				surface. Sections A.4, A.5, B.1 and B.2 have been updated accordingly.	
3	General	<p>Thirty-one soil samples were collected during the 2017 Parametrix investigation. Samples were generally collected from two sample depths ranging from 0.5 to 2 feet bgs (majority taken from 1-foot) and 5 to 8 feet bgs (majority taken from 5 feet). The shallower samples were analyzed and used to screen deeper samples for further analysis. However, some shallow samples were reported as not detected (ND) but analysis of deeper samples indicated the presence of contaminants. This inconsistency appears to present a data gap. For example, during the 2017 study, four (of 31) soil samples were analyzed for volatile organic compounds (VOCs) and only samples collected from 1-foot bgs were analyzed. DEQ acknowledges the results for the four soil samples were reported as "non-detect." However, four samples from 1-foot bgs may be insufficient for identification of deeper contamination sitewide. Please review 2017 data to determine if contamination at depth was potentially not identified during this prior approach and adjust the work plan accordingly.</p>	C, E	<p>We have reviewed the sample data as requested and have added a boring location near Parametrix's boring BM-B-5 to characterize deeper vadose zone soil in this area. Shallow soil was nondetect for all constituents, and the deeper soil from this location was not analyzed. However, TPH was detected in groundwater, which suggests it may be located in smear zone soil. Other locations in which the shallow soil was used to screen the deeper soil The deeper soil samples in all of the proposed soil borings will be analyzed independent of the shallow sample results. Sections B.1 and B.2 have been updated accordingly.</p>	
4	General	<p>PCBs were not part of the analyte list during the 2017 investigation. PCBs have been used historically in old hydraulic systems and found in used oil. A former railroad track and possible spur onsite were likely used to transport logs to and/or cut planks from the lumber mill. Total petroleum hydrocarbons (TPH) were identified in soil and groundwater samples. DEQ recommends PCBs be added to the analyte list for sediment, soil and groundwater samples.</p>	C, E	<p>Analysis for PCBs has been added to the analyte list for soil samples to be collected from all riverbank samples and on soil samples that are determined to have TPH concentrations in excess of 500 ppm, as PCBs would generally be present in an area of hydrocarbon release. PCB analysis of groundwater samples will only be conducted if PCB impacts are detected at a particular location in soil. PCBs are highly insoluble and are therefore not anticipated to be present in groundwater. Sections A.5, B.1 and B.2 have been updated accordingly.</p>	
5	A5	<p>"Data Gap: Potential presence of HOTs and USTs associated with..." does not discuss potential for encountering groundwater in soil</p>	C	<p>A statement has been added that if groundwater is encountered and if soil exhibits signs of contamination a</p>	

		borings and, if groundwater is encountered, rationale for selection of samples to be collected.		groundwater sample will be collected. Sections A.4, A.5, and B.2 have been updated accordingly.	
6	A5	“Data Gap: Incomplete delineation of the following areas for contaminants of concern (TPHs, PAHs, and metals)...” does not include metals analysis for soil nor groundwater samples in the list of analytes. DEQ recommends including RCRA 8 metals as part of the analytical suite. This comment also applies to “Data Gap: Unknown presence or extent of contamination in riverbank sediment...”	D	The inclusion of metals as a contaminant of concern was an error. Metals were not detected in soil above background concentrations for the Coast Range Physiographic Province and are therefore. Detections of metals above ecological screening levels in groundwater were likely due to naturally occurring metals in soil.	
7	B2	Please revise Table #2. Sample Matrix to reflect addition of RCRA 8 metals, per DEQ comment #4 above.	D	See response to comment 6.	

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