



# Oregon

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*via electronic delivery*

Attn: Chris Chiola  
Tillamook County  
201 Laurel Avenue  
Tillamook, OR 97141

RE: **DEQ Comments for Site-Specific Quality Assurance Project Plan**  
Highway 101 Former Mill Site (former Wheeler Lumber Mill)  
Wheeler, OR  
ECSI #6581

Chris:

The Oregon Department of Environmental Quality (DEQ) reviewed the *Site-Specific Quality Assurance Project Plan, Highway 101 Former Mill Site*, dated January 11, 2024, prepared by CHA Consulting, Inc., on your behalf. The former mill site is located along Highway 101 near Marine Drive in Wheeler, Oregon and consists of Tillamook County tax lots 2N1002BC04700, 2N1002BC04800, 2N1002BB00400, 2N1002BB00300, and 2N1002BB00301.

DEQ appreciates the opportunity to review the *Site-Specific Quality Assurance Project Plan (SSQAPP)* and is providing this letter to document our recommendations for inclusion into the work plan.

### General Comments:

1. 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.
2. 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.
3. 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.

4. 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.

### **Section Specific Comments:**

#### *Section A.5 Project Task Description.*

5. “Data Gap: Potential presence of HOTs and USTs associated with...” does not discuss potential for encountering groundwater in soil borings and, if groundwater is encountered, rationale for selection of samples to be collected.
6. “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...”

#### *Section B.2 Methods for Environmental Information Acquisition*

7. Please revise *Table #2. Sample Matrix* to reflect addition of RCRA 8 metals, per DEQ comment #4 above.

DEQ appreciates your consideration of our comments and looks forward to your responses to the items noted above and inclusion of the items in a revised SSQAPP. Please contact me at (503) 686-3903 or [kara.e.master@deq.oregon.gov](mailto:kara.e.master@deq.oregon.gov), if you wish to meet to discuss any of the comments above prior to providing response.

Respectfully,



Kara Master, Project Manager  
Northwest Region Cleanup Section

Cc: Sarah Absher, Tillamook County  
Madison Sanders-Curry, EPA  
Keith Ziobron, CHA  
Sam Urban, CHA  
Katie Daugherty, DEQ

Ecc: ECSI #6581 file