



# Oregon

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*via electronic delivery*

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

RE: **DEQ Comments for Phase II Environmental Site Assessment Report**  
Highway 101 Former Mill Site (former Wheeler Lumber Mill)  
Highway 101 at Marine Drive, Wheeler, OR  
ECSI #6581

Chris:

The Oregon Department of Environmental Quality (DEQ) reviewed the *Phase II Environmental Site Assessment Report, Highway 101 Former Mill Site*, dated July 11, 2024, prepared by Terraphase Engineering, Inc., on behalf of Tillamook County. The former mill site is located west of 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 *Phase II Environmental Site Assessment Report* and is providing this letter to document our observations and recommendations for inclusion into a revised report.

### General Comments:

1. The investigation report must be stamped by an Oregon registered geologist or professional engineer in responsible charge of the work per Oregon Revised Statutes Chapter 672. Page v of the document includes signatures but no professional stamps. DEQ previously advised CHA of the stamping requirements in the May 20, 2024 email.
2. DEQ requests that previously prepared work plans and investigation reports not be appended to the report, unless required by the County or EPA. Doing so conflates the report information and makes it difficult to readily locate data pertinent to the current study.
3. The Phase II ESA report does not provide sufficient information to support DEQ's decision-making framework to issue a No Further Action Determination. The report does not discuss the conceptual site model (CSM), define the locality of facility (LOF), nor consider beneficial uses of land and water (including nearby water wells, surface water). The report focuses on samples collected from Phase II investigation but does not evaluate if previous risk exposure pathways identified during prior investigations have been sufficiently addressed considering the new data collected. The human health and ecological risk assessment is incomplete for potential risk pathways. Proposed redevelopment plans indicate approximately half of the Site will be redeveloped. Screening for habitat supportive of land ecological receptors was not performed or

justification for ecological risk exclusion presented. See Section Specific Comments below for further discussion.

4. Please discuss if any deviations from the approved Site-Specific Quality Assurance Project Plan or limitations were encountered during assessment work.
5. The lead in soil screening level of 400 milligrams per kilogram (mg/kg) for residential receptors has been revised. In January 2024, EPA released [revised residential screening levels](#) for lead in soil. DEQ is applying the revised screening levels. DEQ notes that lead in sediment samples was reported at a maximum detection of 29.3 mg/kg and below the revised screening level. However, we recommend updating the text and corresponding tables to reflect the more conservative RBC.

#### **Section Specific Comments:**

1. *Section 2.2 Geophysical Survey.* The section mentions a geophysical survey but does not summarize the findings of the survey. Please discuss the findings and/or significant deviations from the scope of work of the geophysical survey in Section 3.
2. *Section 2.3.3 Incremental Soil Sample Collection.* Thirty milliliters of each subsample was collected and composited from thirty increments per sample. The total quantity of soil per primary, duplicate and triplicate sample is not described. Multi-increment sampling guidance recommends a default target mass range of 1 to 3 kilograms. Please include the total mass of soil per sample collected to document a sufficient target mass was collected for laboratory analysis.
3. *Section 2.5 Screening Criteria.* Discussion of the conceptual site model in the Scope of Work section is incomplete. Risk exposure pathways for certain receptors are excluded without discussion or reason for exclusion. Please include a section describing the Site's CSM and, based on beneficial use of land and water, reason for selection/exclusion of specific receptors and exposure scenarios.
4. *Section 3.2 Soil Results.* Benzo[a]pyrene was detected at 0.405 mg/kg in the sediment duplicate sample above the RBC for soil ingestion, dermal contact, and inhalation for residential receptors (0.11 mg/kg). This risk pathway is considered complete and, therefore, should be evaluated for human health risk or justification provided for exclusion.
5. *Section 4 Conclusions.* Sample locations were primarily selected during development of the Site Specific QAPP to characterize extent and magnitude of previously identified contaminants. The report does not summarize assessment data relative to the 2017 sampling investigation with respect to delineation of contamination. Please include a comprehensive discussion of Site risk with respect to current and prior data.
6. *Section 4 Conclusions. Former Shingle Mill and Lumber Yard.* The second paragraph presents total petroleum hydrocarbon (TPH) detections in two soil samples. The third sentence of this paragraph should be expanded or revised to connect the use of silica gel cleanup with the 2024 sample results. The last two sentences in this paragraph, related to previous soil results, are speculative and should be removed. The groundwater sample also contained TPH. The conclusions state the groundwater TPH results were flagged by the laboratory as not representing a fuel pattern but the report does not explain the significance of this. Revise the text accordingly.
7. *Section 5 Recommendations.* The recommendations indicate that shallow groundwater should not be used for drinking water. However, an evaluation for the beneficial use of water within a

defined LOF is not discussed in the report. The reason for exclusion is insufficient to rule out the risk pathway for residual contamination. Please provide further justification for this recommendation and for excluding the risk pathway.

8. *Daily field logs.* Field logs include information for other Tillamook projects not relevant to the former Wheeler Lumber Mill. Information not relevant to the Site should be specifically noted or stricken to reduce confusion to the reviewer.
  - a. Fields notes from May 22, 2024 include reference to a sheen in the sediment sample area but no further information, observations or assumptions as to the source (i.e., petroleum vs organic matter). Significant observations noted during field work should be included in the body of the report.
  - b. Though not stated, it is assumed that groundwater samples were not field filtered prior to submission to the analytical laboratory.

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 report. 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

Ec: Sarah Absher, Tillamook County  
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