



March 21, 2024

via email delivery

Robert Ireland
Banks Sunset Park Association, Inc.
12765 NW Main St
Banks, OR 97106

RE: DEQ Comments on *Sampling and Analysis Plan – Sunset Park Trap Shooting Range*
Banks Gun Club
ECSI #6501

Robert,

The Oregon Department of Environmental Quality (DEQ) reviewed the *Sampling and Analysis Plan – Sunset Park Trap Shooting Range* prepared by WSP USA Environment & Infrastructure, Inc. (WSP) on behalf of Banks Sunset Park Association, Inc., relating to Banks Gun Club (Site), identified in our files as ECSI #6501. Review was completed under a Voluntary Cleanup Pathway agreement signed April 10, 2023.

Prior investigations on the north adjoining farm property identified lead contamination in soil exceeding 100,000 milligrams per kilogram (mg/kg), presumably related to operation of a gun range on the northwest portion of Banks Sunset Park property. Lead concentrations in soil on the farm property vary considerably based on sampling methodology used during the assessments, and appear to decrease with sample depth below ground surface. However, lead detections were reported above applicable DEQ risk-based screening levels and the regional background concentration for lead in soil. Soil at the Banks Sunset Park property has not been assessed for lead contamination and, therefore, warrant investigation to determine potential risk to park users and ecological receptors.

DEQ appreciates the opportunity to review the Sampling and Analysis Plan (SAP) and is providing this letter to document our recommendations for inclusion into the SAP.

General Comments

1. The estimated sizes and distribution of the decision units (DUs) is generally reasonable based on the anticipated shotfall zones and accessibility by site receptors. However, we believe that the proposed DU boundaries could be adjusted in a way that results in fewer decision units, better aligns with the conceptual site model, and is more representative of potential receptor exposure scenarios (see attachment). We request a brief meeting following receipt of these comments to discuss opportunities to optimize the sampling grid/decision unit boundaries.

Specific Comments

1. *Section 4.3 Soil Investigation.* There is a potential for lead shot fragments to be encountered during sampling. Please describe how lead shot will be managed, if encountered. Further, if lead shot is identified during advancement and collection of the near surface samples, please clarify if an attempt will be made to delineate the vertical extent of contamination.

2. *Section 4.4 Investigation Derived Waste.* Soil cuttings will be returned to the borehole. DEQ recommends soils are returned to the borehole at approximately the same depth that they were removed.
3. *Section 4.5 Summary of Environmental Samples.* Though not explicitly stated, DEQ assumes that soil samples will be analyzed for total lead in addition to TCLP analysis by EPA Method 6020B. A detection limit is not specified. Please include the target detection limit.
4. *Section 4.5.1 Quality Control.* Duplicate and replicate samples are proposed to be collected from the surface sample depth to represent 10% of the surface DUs. No duplicate samples are proposed for the near surface depth. If near surface samples are analyzed, quality assurance goals may not be met.
5. *Section 6 Analytical Methods.* In January 2024, EPA updated its screening levels for lead in residential soil to be more health protective. The previous RSL was 400 ppm, which underpins DEQ's RBC for lead in residential soil. The [new EPA guidance](#) recommends a residential screening level of 200 ppm as a generic screening level, and 100 ppm if there are multiple lead sources. There is no known safe blood lead level in children. Due to use of the park by children, DEQ recommends screening soil sample data against a RSL of 200 mg/kg.

DEQ recognizes this change was made after we last met to discuss the project. DEQ has also discussed the ability to calculate a site-specific park user exposure scenario with our toxicologists and were informed that Oregon Health Authority has rejected the park user scenario for lead, and required use of residential direct contact RBCs.

6. *Section 7 Documentation and Reporting.* Please include discussion of the results with regards to DEQ's regulatory framework in the report.

DEQ appreciates your consideration of our comments and would like to meet with you to discuss prior to revising the work plan. Please contact me at (503) 686-3903 or kara.e.master@deq.oregon.gov to coordinate availability prior to providing response.

Respectfully,



Kara Master, Project Manager
DEQ Northwest Region Cleanup Section

Attachment: Alternative DUs Figure

Cc: Wesley Thomas, DEQ
Kevin Dana, DEQ
Daniel Schall, WSP
John Kuiper, WSP
Matthew Brown, WSP

LEGEND:

- ⊙ Proposed Soil Sample Location
- ▭ Site Boundary
- ▭ Decision Unit Boundary

Remove DU-A., or sample/
hold pending results of DU-B
and DU-F

Adjust DU-B to only include
wetland areas

DU-E (Combine with parts of
DU-J)

Adjust DU-F to only include
wetland areas

Adjust DU-G boundary to
include all non-wetland area
to the west of the road

Recommend excluding hard
packed gravel road from
DUs.

DU-I (Combine with parts of
DU-H and DU-G). Consider
sampling and holding based
on results of DU-H and DU-G

Boundary could be adjusted,
as needed, to balance areas
between H and I.

DU-H (Combine with parts of
DU-J and DU-G)

DRAWN BY: PM CHECKED BY: JKH

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BANKS SUNSET PARK
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PROPOSED SAMPLING GRID
AND SAMPLE LOCATIONS

DATE	MARCH 2024
SCALE	1" = 60'
PROJECT NO.	2-61M-12489-1
FIGURE	4