



May 15, 2024

via email delivery

Jennifer Levy
Cascade Environmental Solutions
7302 N Richmond Ave
Portland, OR 97203

RE: Rosemont Court Work Plan
597 N Dekum St, Portland, OR 97217
ECSI #2762

Jennifer,

Thank you for the opportunity to review the *2024 Rosemont Court Workplan* (Work Plan) prepared by Cascade Environmental Solutions on behalf of NW Housing Alternatives relating to Rosemont Court (Site), identified in our files as ECSI# 2762. The Work Plan describes proposed soil removal activities required to address risk due to the potential for contact with lead contamination in Site soils surrounding the building that exceed DEQ's residential risk-based concentration (RBC) for lead in soil.

Historic and more recent investigations identified lead contamination in surface and near surface soil, presumably related to lead-based paint abatement activities on the exterior of the former convent building. NW Housing Alternatives is requesting a No Further Action (NFA) determination from DEQ based on environmental assessments and cleanup activities at the Site.

DEQ offers the following comments for consideration regarding the Work Plan.

General Comment

1. All drawings, reports or other geologic papers or documents involving geologic work must be stamped by an Oregon registered geologist in responsible charge of the work per Oregon Revised Statutes Chapter 672. Please ensure the Work Plan and Closure Report are professionally stamped.

Proposed Soil Excavation Activities

2. Approximate square footage of the decision units (DUs) to be excavated are provided in the Work Plan, with proposed excavation depths of 3-feet below ground surface. Additional description of the approx. distances from the Site building to the edges of the excavation areas are not provided. Figures depicting DU increments have not been previously submitted for DU-2 and DU-3 to visually estimate the removal area. Please confirm the attached Work Plan figures adequately map out the areas to be excavated.
3. The Work Plan does not describe how excavated soil will be managed during removal. Please revise the Work Plan to describe management of contaminated soil, including potential

stockpiling of contaminated soil, loading of soil into solid waste dumpsters or direct loading into truck(s), and how it will be transported for disposal at a permitted waste facility.

Proposed Sampling Activities

4. Please include a description of quality assurance/quality control methods to be followed during confirmation sampling.
5. If post-soil removal confirmation samples indicate lead concentrations have not been adequately reduced below DEQ's RBC, DEQ requests to be notified to determine appropriate next steps.
6. The Work Plan assumes excavated soil will be acceptable for disposal at a Subtitle D landfill. Discussion of how lead contaminated soil will be characterized for proper waste disposal is not included in the Work Plan. Please revise to describe waste characterization methods.

Reporting and Site Closure

7. Excavated areas will be backfilled with clean, imported soil. Please either sample the backfill material or submit a statement from the source provider that the soil meets DEQ's clean fill criteria.
8. The closure report should include a discussion of the Conceptual Site Model and remaining risk, if residual soils will be left in place. Further, the closure report should include limitations or deviations from the work plan during implementation, interpretation of analytical results with regards to DEQ's regulatory framework, conclusions and recommendations, and appendices for figures, laboratory reports, photographs, and soil boring logs. Please revise the Work Plan to include this additional information.

DEQ appreciates your consideration of our comments and looks forward to incorporation of the items noted above in a revised work plan. If you have any questions or concerns, or would like to discuss the above comments, please feel free to contact me at (503) 229-5585 or kara.e.master@deq.oregon.gov.

Respectfully,



Kara Master, Project Manager
DEQ Northwest Region Cleanup Section

Cc: Wesley Thomas, DEQ
Kali Bose, NW Housing Alternatives