



Oregon

Tina Kotek, Governor

Department of Environmental Quality

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December 6, 2024

via electronic delivery

Stephen Morris, Environmental Scientist
GeoPacific Engineering, Inc.
14853 SW 72nd Ave
Portland, Oregon 97224

RE: Site Assessment, Conceptual Site Model, and Regulatory Risk-Based Closure Report,
Huser Estates Property
ECSI # 6591

Dear Steve Morris:

The Oregon Department of Environmental Quality (DEQ) reviewed the November 1, 2024 *Site Assessment, Conceptual Site Model, and Regulatory Risk-Based Closure Report* (hereafter referred to as “the report”) prepared by GeoPacific Engineering, Inc. (GeoPacific) on behalf of George Dunkel for the Huser Estates Property site at 52391 SW Keys Road, Scappoose, Oregon (ECSI# 6591), hereafter referred to as “the site”. Herein, we provide several clarifying comments for the record and issue minor requests for changes in a final report.

General Comments

1. Per DEQ (2019),¹ GeoPacific must have an Oregon-licensed Professional Engineer or Professional Geologist stamp the final report. Please stamp the final version.
2. GeoPacific did not follow our recommended approach for Incremental Sampling Method (ISM) Decision Unit (DU) selection, as described by DEQ (2020a)². In general, residential properties should be evaluated on a per-lot basis (e.g., 5,000 ft² area), though site-specific information can be provided to justify larger DUs. In the case of the Huser Estates site, the remedy was implemented sitewide and is expected to have removed contamination related to historical pesticide use. Therefore, no change is needed to address this comment, but please review the ISM guidance for future reference.

Specific Comments

1. Section 3.1

¹ <https://www.oregon.gov/deq/FilterDocs/cu-stamping.pdf>

² <https://www.oregon.gov/deq/FilterDocs/DUIMD.pdf>

- a. Please specify the depth at which confirmatory soil subsamples were collected for ISM. The text currently only says “samples were collected as composite samples **from the surface**”.
 - b. Locations from the initial DU subsampling effort are provided in figures. Please clarify the location of or method for selecting sampling positions of confirmatory subsamples. DEQ would prefer if these locations were shown on a figure.
 - c. Section 3.1 says that “samples were collected **in general accordance**” with DEQ and ITRC methods. Describe notable discrepancies in the site sampling protocol from DEQ and ITRC methods. See General Comment #2 for example.
2. Section 3.1.1 – Please clarify whether each individual increment was 2 oz of soil, or whether the total ISM sample volume was 2 oz. As currently written, the text in this section could be interpreted either way.
 3. Section 4.2 – DEQ’s recommended search radius for a Beneficial Water Use Determination is 1 mile (DEQ 2017).³ This is larger than the “approximate 1,000 foot radius” considered in the report. That said, DEQ agrees that local well logs and other estimates of local groundwater depth indicate that the depth to groundwater at the site and nearby is well below the depth potentially affected by residual contamination at the soil surface. As such, we do not expect that the site has a significant connection to groundwater that might be used as drinking water or discharge to surface water. Shallower wells are present in the more urban/industrial area of Scappoose, but these are far from the site and lack a clear pathway. No change is needed to address this comment, but please review relevant DEQ guidance for future reference.
 4. Section 4.4
 - a. DEQ’s ecological risk assessment guide (DEQ 2020)⁴ provides as Appendix A1 a “Basic Site Information Checklist”. Please fill out this checklist and append it and related information (text and figures) to the report. The checklist requires basic information about potential habitat at the site and is a means of confirming whether or not a detailed ecological risk assessment is warranted for the site. DEQ (2020) provides tables of RBCs that are specific to ecological receptors rather than human receptors.
 - b. Please remove any reference to human health RBCs in Section 4.4, as they are not relevant to the section.
 5. Section 5 – this section describes what a Conceptual Site Model (CSM) is but fails to clearly lay out the CSM according to DEQ (2017) guidance.⁵ Receptors are identified, but neither sources nor exposure pathways are clearly identified in this section. Based on the screening steps presented in the preceding sections of the report, we assume that the CSM considers only the soil ingestion, dermal contact, and inhalation pathway as complete for residential, construction worker, and excavation worker receptors. The data support this CSM so long as it is assumed that shallow soil reflects the worst-case

³ <https://www.oregon.gov/deq/FilterDocs/GuidanceBeneficialWaterUse.pdf>

⁴ <https://www.oregon.gov/deq/hazards-and-cleanup/env-cleanup/pages/era.aspx>

⁵ <https://www.oregon.gov/deq/filterdocs/RBDMGuidance.pdf>

exposure medium for construction and excavation workers, whereas deeper soil is assumed to be relatively uncontaminated. No change is needed to address this comment.

6. Section 6.1 – The only chemical of concern for the site (arsenic) is non-volatile, therefore volatilization to outdoor air and vapor intrusion into buildings are not complete pathways. Please remove these from consideration.
7. Section 7 – When discussing the lack of connection between soil and groundwater, this section states that, “...arsenic was not detected below 1 foot bgs...”. This is not true and should be revised to say that “...arsenic below 1 ft bgs did not exceed background...” or equivalent text. For example, Appendix E Table 2 shows that arsenic was detected in every sample regardless of depth but only exceeded the 12 ppm background threshold in samples collected between 0 to 1 ft bgs.
8. The set of Photos at the end of the report’s main text are duplicated; please remove the second set of 10 photos.

Please submit a revised report and formal response to comments, including a description of how comments were addressed and rationale for rejecting comments, as applicable. Contact me at (503) 830-4442 or brian.church@deq.oregon.gov if you want to discuss these comments.

Sincerely,



Brian Church
Project Manager and Data Analyst
Northwest Region Cleanup Program

Cc: Wes Thomas, DEQ
Amanda Wozab, DEQ
ECSI #6591