



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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January 20, 2021

Aaron Leritz
Bridgewater Group
4500 SW Kruse Way, Suite 110
Lake Oswego, OR 97035

RE: Comments on Soil Management Plan
for Sunshine Portland Property in Portland
ECSI #5829

Aaron:

DEQ staff have received and reviewed the updated ***Soil Management Plan*** (SMP) prepared by Bridgewater Group for the Sunshine Portland property in Portland, Oregon. DEQ has a handful of general and specific comments on the updated SMP.

The last two paragraphs in Section 1.0 of the SMP suggest that the SMP only applies to capped soils in the northwest corner of the site, an area specified in Attachment A to the SMP and referred to as the “SMP Area”. While the SMP Area is important and is appropriately called out for individual discussion, the SMP itself should be written to apply to the entire site. Both the 2014 Easement & Equitable Servitudes (EES) and the new EES that will incorporate the SMP cover the entire site, and potentially-contaminated fill soils are present across large portions of the site. The SMP should be modified so that it applies to both the specific concerns of the SMP Area and more broadly to any potentially-contaminated soils encountered at the site.

Secondly, regarding the 4th bulleted paragraph in Section 3.1, it’s confusing to say that soils outside the SMP Area are assumed to be contaminated. The paragraph should start by saying that soils outside the SMP should be evaluated for visual or olfactory indications of contamination. Soils without indicia of contamination can be used at the site without additional sampling or characterization. Soils that appear to be contaminated should be sampled and handled as described in the rest of the paragraph.

A couple of specific comments:

- The last sentence of the 1st paragraph in Section 2.0: the suspected extent of residual diesel-contaminated soils beneath Building B is only indicated on Figure 2, not Figure 3.
- The first sentence of Section 3.2: the cap over the SMP Area should be maintained consistent with the specifications in Figure 4, not Figure 3.

Finally, as the *Soil Management Plan* discusses an engineering control at the site, it should be stamped by a Professional Engineer registered in the State of Oregon.

Please provide a final, signed and stamped version of the *Soil Management Plan*. I can be reached at (503) 229-5369 or by e-mail at dana.kevin@deq.state.or.us if you have any questions or

comments on this letter. We appreciate your work on this site, and look forward to wrapping up our work on the project.

Sincerely,

A handwritten signature in blue ink that reads "Kevin Dana". The signature is written in a cursive, flowing style.

Kevin Dana, Project Manager
Northwest Region Cleanup

cc: Wayne Laufer, Sunshine Portland LLC
ECSI #5829 File