



# Oregon

Kate Brown, Governor

## Department of Environmental Quality

Northwest Region

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May 26, 2022

Jonathan Williams  
Alpine Environmental Consultants  
12210 Antioch Rd.  
White City, OR 97503

RE: Comments on Draft Environmental Investigation Work Plan  
for Valmont Coatings in Tualatin  
ECSI #5353

Jonathan:

The Department of Environmental Quality (DEQ) has completed its review of the draft *Environmental Investigation Work Plan* prepared by Alpine Environmental Consultants on April 18, 2022 for the Valmont Coatings site, located at 9700 SW Herman Road in Tualatin.

The draft work plan proposes advancing five borings around the stormwater detention pond at the south end of the site. The borings would extend 15 feet below ground surface (bgs) and would be screened from 5-15 feet bgs. A soil sample would be collected from each boring (at an unspecified depth; presumably at the soil/groundwater interface) and analyzed for zinc by EPA Method 6020. Groundwater samples from the borings would be analyzed for both total and dissolved zinc.

Although zinc is the primary contaminant of potential concern at the site, it is not the only contaminant of potential concern. Other potential contaminants should also be analyzed for to demonstrate that they are not present at concentrations of concern at the site.

The historical aerial photographs attached to the draft work plan show that development at the site began circa 1970, when a portion of the forested patch in the center of the site was cleared as part of the development of the west-adjacent property. The use of this developed patch of land, from at least 1973 to 1990, has not been documented. DEQ's records of the west-adjacent property (Oregon Sandblasting & Coating, ECSI #5478) show various metals in stormwater runoff and spent sandblast grit, and that a 300-400 gallon diesel spill entered a drainage ditch along the Valmont property line in January 2000.

To investigate soils and groundwater in this area, DEQ suggests advancing soil borings in the drainage ditch and on the south side of the on-site building. Soil samples from the borings should at least be analyzed for petroleum hydrocarbons by the Northwest Total Petroleum Hydrocarbon Identification method (NWTPH-HCID) as well as 13 metals (Priority Pollutants) by EPA Method 6020. Temporary well screens should be installed in the borings, and shallow groundwater should also be analyzed for petroleum hydrocarbons and total and dissolved metals.

Any samples where petroleum hydrocarbons are identified should be further analyzed for petroleum-related volatile organic compounds (VOCs) by EPA Method 8260 (if gasoline-range hydrocarbons are identified) and/or polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270 (if diesel- or oil-range hydrocarbons are identified). The depth to groundwater in these borings, and borings around the stormwater detention pond, should be measured to document the shallow groundwater flow direction. Sampling for additional contaminants may also be necessary, depending on the use of the site from about 1970 to 1995.

An Ecological Risk Assessment will also need to be conducted to evaluate potential threats to the adjacent Hedges Creek wetlands. A Tier I Ecological Risk Assessment (Generic Screening Level Risk Assessment) will likely be needed, as at least one complete exposure pathway (stormwater discharge to the wetlands) is present. (Treatment of the stormwater would be described in the Tier I ERA). Sampling of the wetlands adjacent to the site will be necessary as part of the Tier I ERA. Guidance on “Conducting Ecological Risk Assessments” can be found on DEQ’s web pages at <https://www.oregon.gov/deq/filterdocs/EcoRiskIMD.pdf>.

Please prepare a revised *Environmental Investigation Work Plan* for DEQ review and approval, incorporating additional sampling to address concerns with the wetlands and the pre-1996 developed portion of the site. If you have any questions about this letter, please contact me at (503) 229-5369, or via e-mail at [kevin.dana@deq.oregon.gov](mailto:kevin.dana@deq.oregon.gov). DEQ thanks you for your work on this site.

Sincerely,



Kevin Dana, Project Manager  
Northwest Region Cleanup Program

cc: ECSI #5353 File