

EAGLE Sarah * DEQ

From: EAGLE Sarah * DEQ
Sent: Friday, October 4, 2024 12:25 PM
To: jwilliams@alpine-env-llc.com
Cc: John Day (jday@johndayhomes.com); tony@cecengineering.com
Subject: RE: Hillcrest - Cogswell Partition - Spring Street & Judson Street

Hi Jonathan,

Welcome back to town and thanks for giving me a call yesterday afternoon. As we discussed, the comment period regarding the DEQ proposed approval of the soil cleanup plan at the 2-acre parcel at Hillcrest Orchard site ended on October 2. We received no comments.

I'm following up now to provide DEQ approval of the cleanup plan. Please be advised that DEQ has added a comment in the cleanup plan that was submitted by Alpine Environmental. The record copy of the cleanup plan and the embedded comment is located here [20240911_6554_Hillcrest Revised Soil Removal Action Plan for 2-Acre Parcel_DEQcomment](#).

Additionally, DEQ is striving to be more proactive in educating about the protection of archeological and cultural resources. Here is a link to the DEQ fact sheet which contains a high-level overview of the laws and requirements, in particular the state laws protecting cultural resources which apply at all cleanup sites, not just those with a federal component: [ProtCulturalResFS.pdf \(oregon.gov\)](#)

Finally, here's a direct link to the SHPO inadvertent discovery plan template:
https://www.oregon.gov/oprd/OH/Documents/RC_IDPTemplate.docx

Please let me know if you have any questions. I look forward to hearing about your progress.

Best,

Sarah D. Eagle, GIT (she/her)
Project Manager
Western Region Environmental Cleanup
Oregon Department of Environmental Quality
165 E. 7th Avenue, Suite 100
Eugene, OR 97401
971-357-5275
Upcoming Out of Office: Oct 11th - Nov 6th

From: EAGLE Sarah * DEQ <Sarah.EAGLE@deq.oregon.gov>
Sent: Wednesday, September 11, 2024 12:31 PM
To: jwilliams@alpine-env-llc.com <jwilliams@alpine-env-llc.com>
Cc: John Day (jday@johndayhomes.com) <jday@johndayhomes.com>; tony@cecengineering.com
Subject: RE: Hillcrest - Cogswell Partition - Spring Street & Judson Street

Hi Jonathan,

Thanks for submitting this revised removal action plan and providing the requested detail. We had some internal discussion regarding the options for the soil repository cap and we didn't feel comfortable approving the plan for import material without any analytical testing. However, we did feel like 2.5 feet of clean cover from onsite (i.e. of known composition) material would be sufficient.

In order to support your timeline objectives, we're planning to add this comment to the Revised Soil Removal Action Plan page 10 and initiate a 2-week public comment period on Monday, September 16:

“DEQ comment: Any import material for repository cover will need to be pre-screened for potential contaminants. DEQ approves of the second option for 2.5 feet of soil cover sourced from the subject property with or without fencing, provided that adequate signage is installed and the repository is appropriately maintained, inspected, and documented within an EES.”

Please let me know if you have any questions. We can plan to touch base after the public comment period, if that works for you.

Best,

Sarah D. Eagle, GIT (she/her)
Project Manager
Western Region Environmental Cleanup
Oregon Department of Environmental Quality
165 E. 7th Avenue, Suite 100
Eugene, OR 97401
971-357-5275

From: jwilliams@alpine-env-llc.com <jwilliams@alpine-env-llc.com>
Sent: Monday, September 9, 2024 4:56 PM
To: EAGLE Sarah * DEQ <Sarah.EAGLE@deq.oregon.gov>
Cc: John Day (jday@johndayhomes.com) <jday@johndayhomes.com>; tony@cecengineering.com
Subject: RE: Hillcrest - Cogswell Partition - Spring Street & Judson Street

Good afternoon Sarah – Attached for your review is the Revised Soil Removal Action Plan that I believe addresses all of your comments. To facilitate your review, I have also attached a redlined copy of the MS Word document.

When we talked last, my understanding is DEQ still believes a public comment period is appropriate, though the duration might be less than the typical 30 days. Assuming the Revised Plan adequately addresses DEQ's comments, we seek your assistance in expediting the public comment period such that we can complete all of the earthwork before the rainy season hits.

If you have any questions or require additional information, please feel free to contact me.

Regards – Jonathan

Jonathan D. Williams, R.G.
Senior Hydrogeologist, Principal
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From: EAGLE Sarah * DEQ <Sarah.EAGLE@deq.oregon.gov>
Sent: Friday, August 16, 2024 10:53 AM
To: jwilliams alpine-env-llc.com <jwilliams@alpine-env-llc.com>
Subject: RE: Hillcrest - Cogswell Partition - Spring Street & Judson Street

Hi Jonathan,

Glad we got the chance to touch base earlier this morning. Please see attached for our comments on the soil removal action plan.

We are still planning on doing the public comment period for this. We might want to chat about the best newspaper/distribution route locally once we get to that point. Also, since the public comment will point to the soil removal action plan, resolution of the attached comments will likely require edits to the removal plan and not just response.

Feel free to give me a call about the comments. If there are any that are particularly burdensome, we might want to go ahead and have a call with me, you, and Don (and John/Barbara, if appropriate).

Best,
Sarah

From: jwilliams alpine-env-llc.com <jwilliams@alpine-env-llc.com>
Sent: Friday, August 16, 2024 8:37 AM
To: EAGLE Sarah * DEQ <Sarah.EAGLE@deq.oregon.gov>
Subject: RE: Hillcrest - Cogswell Partition - Spring Street & Judson Street

Good morning Sarah – I wanted to see how things were going with your review of the Revised Supplemental Investigation Report and the Soil Removal Action Plan.

Please recall we are planning to start the work in September to ensure we can be wrapped up before we get any heavy rains.

Also, I believe the issue of public comment may have fallen off of the radar for this project. Do we still need to go through public comment?

Regards – Jonathan

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From: EAGLE Sarah * DEQ <Sarah.EAGLE@deq.oregon.gov>
Sent: Wednesday, July 31, 2024 10:24 AM
To: jwilliams alpine-env-llc.com <jwilliams@alpine-env-llc.com>
Subject: RE: Hillcrest - Cogswell Partition - Spring Street & Judson Street

Hi Jonathan,

One quick question as I'm moving through my review of the Soil Removal Action Plan—can you give me an estimate of the duration of construction work?

Don and I have both reviewed, but we want to loop the engineer in and compare notes before we respond with all the DEQ comments.

Regarding my review against the WQ CMMP checklist—there were a few gaps compared to what WQ would likely be wanting. I wanted to pass these along sooner since permitting and Cleanup review are separate processes and timelines...

- 1) Summary of the known contamination/contaminants of concern. You've got a bit of narrative in there, that coupled with the content in the supplemental investigation report is enough for Cleanup to evaluate the plan. However, as a standalone document, the Soil Removal Action Plan doesn't fully describe this (i.e. concentrations, RBCs). WQ might think reference to the supplemental investigation report is sufficient for this, but it's also possible they'll kick it back for not including all the required content in the free-standing document.
- 2) A CMMP would normally include a process for what to do if unanticipated or unknown contaminated media is encountered during work. Since you did those ESAs earlier, it's unlikely you'll encounter anything, but this is just a gap that I'm identifying since you'd have to consult the references to know that. (And I'm unsure whether WQ will require this document to be standalone).
- 3) There's not commentary about whether GW will be encountered. I'm actually not sure whether in any of the reports you've submitted indicate the depth to groundwater. Obviously, due to the shallow depth of the anticipated excavation, it seems incredibly unlikely to encounter groundwater, I'm just remarking since this a checkbox in the CMMP review.
- 4) This is probably the most meaningful comment regarding the CMMP review—there's a fair bit of information that WQ may be expecting that is likely to be included in the forthcoming HASP. In section 2.2.1 it describes the plan to develop a HASP. Sounds great, totally appropriate, but a few items in the CMMP checklist will likely be included in the HASP: project schedule, key persons, and communication. WQ might be fine with just knowing you plan to develop a HASP, but it's also possible they'll want the information from the HASP for the CMMP.

Overall, for the CMMP/1200C piece, you can choose to add content to the Soil Removal Action Plan in anticipation of their comments, or just submit the Soil Removal Action Plan as your CMMP and see what they kick back. I think it really depends on the permit writer. I've reached out to WQ and told them I'd be happy to answer any questions they may have about the project or the site in order to assist, so it's possible they'll be flexible. But then again, it's also possible they'll kick it back with comments similar to the above items I've identified.

Hope that's helpful! We'll be in touch with Cleanup's consolidated feedback on the Soil Removal Action Plan.

Thanks!
Sarah

From: EAGLE Sarah * DEQ <Sarah.EAGLE@deq.oregon.gov>
Sent: Friday, July 19, 2024 2:43 PM

To: jwilliams alpine-env-llc.com <jwilliams@alpine-env-llc.com>
Subject: RE: Hillcrest - Cogswell Partition - Spring Street & Judson Street

Hi Jonathan,

I just wanted to check in and let you know that I haven't completed my review of the soil removal action plan...And I'm out of office next week. I'm blocking off my day on Monday, July 29, to prioritize completing this. However, it'll also depend on getting feedback from Don and potentially our engineer. Anyhow, I'll be in touch!

Best,
Sarah

From: jwilliams alpine-env-llc.com <jwilliams@alpine-env-llc.com>
Sent: Wednesday, July 17, 2024 10:25 AM
To: EAGLE Sarah * DEQ <Sarah.EAGLE@deq.oregon.gov>
Subject: RE: Hillcrest - Cogswell Partition - Spring Street & Judson Street

Thanks for the update and recommendations Sarah.

It would be helpful if you could review the WQ CMMP checklist against the Soil Removal Action Plan and share your thoughts because that will help us on the Stormwater side of things, plus you'll need to review the Soil Removal Action Plan anyway for Hillcrest....two birds with one stone...or shot.

For the Coker Butte project, we simply prepared a Soil Removal Action Plan and used the one approved by Tina and Don one as the template for Hillcrest. And no, the Stormwater folks never asked for anything else. We have another former orchard project where Don is the PM (Medco Orchard) and just wrapped up a soil removal....no questions from the Stormwater folks. So, Hillcrest is the first former orchard project where this issue has come into play for us.

We're not averse to satisfying Kendra and other folks in the Stormwater Program, but we want to do it in an efficient manner and it sounds like we'll be doing this on a fairly frequent basis. We have heaps of these projects on the VCP waiting list.

Regards - Jonathan

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From: EAGLE Sarah * DEQ <Sarah.EAGLE@deq.oregon.gov>
Sent: Wednesday, July 17, 2024 9:00 AM
To: jwilliams alpine-env-llc.com <jwilliams@alpine-env-llc.com>
Subject: RE: Hillcrest - Cogswell Partition - Spring Street & Judson Street

Hi Jonathan,

So, I asked Kendra about providing an example and she just referred me to the Appendix A form that you had attached. Here's what I think is the simplest course of action:

- 1) You/Cogswell complete the Appendix A form. Yes, there's a lot of fields that don't apply, but the fact that she keeps referring to Appendix A, I think it needs to be filled out and submitted.
- 2) I think the Soil Removal Action Plan should be reviewed against the WQ CMMP checklist and that list of components under "III. Map" section of the 1200C Appendix A. I can review that, if that's helpful—though I should say that WQ will be authority if there are items they need more detail on. I think the soil removal plan should have nearly all the content and you can submit that alongside the Appendix A form, but I'm not sure if there are any significant deficiencies without reviewing it. *Let me know if you'd like me to review the soil removal action plan with CMMP goggles on.

One other question—for your Coker Butte site, WQ didn't ask for this? I spoke with Don about the Hillcrest 1200C issue and he was like, why aren't they just doing the same thing as Coker Butte?

Best,
Sarah

From: jwilliams@alpine-env-llc.com <jwilliams@alpine-env-llc.com>
Sent: Tuesday, July 16, 2024 2:50 PM
To: EAGLE Sarah * DEQ <Sarah.EAGLE@deq.oregon.gov>
Subject: FW: Hillcrest - Cogswell Partition - Spring Street & Judson Street

Good afternoon Sarah – As we just discussed, attached are the forms that CEC received. Please let me know which forms need to be completed and what kind of package we need to submit. If you or Kendra have a template from another project that you can share, that would be great so we can hit all of the key points and avoid recreating the wheel.

Thanks to you and Kendra for your assistance.

Regards - Jonathan

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From: Sarah Miles <sarah@cecengineering.com>
Sent: Friday, June 14, 2024 2:30 PM
To: jwilliams@alpine-env-llc.com <jwilliams@alpine-env-llc.com>
Cc: John Day <jday@johndayhomes.com>; tony@cecengineering.com; Barbara Light <barbara@hillcrestorchard.com>
Subject: Re: Hillcrest - Cogswell Partition - Spring Street & Judson Street

Jonathan,

I talked with Kendra Girard at DEQ and she sent me Appendix A (Environmental Management Plan Review), see attached. She said it needs to be filled out with attachments. She said you don't need to worry about the Active Chemical Treatment System as it does not pertain to us. Could you please fill this out along with any maps you may have? I have attached our ESCP plans that you may refer to within your document for any information that might be covered there. Please let me know if you need anything!

Thank You,

Sarah Miles

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