

June 30, 2025

Dallas Mill Properties  
ECSI File #6710  
DEQ File and Report Review Comments  
By DEQ Project Manager: Nancy Sawka

## **Environmental Investigation Data Gaps**

DEQ has reviewed the file and the environmental investigation reports submitted by PES Environmental, Inc<sup>1</sup> and Farallon Consulting<sup>2</sup> for the Dallas Mill Properties located at 1551 SE Lyle Street in Dallas. DEQ has identified the following data gaps based on this review and a subsequent site visit on May 23, 2025:

### **Specific to Level I Review**

1. The former log pond located on the west side of the site (PES Level I) will need to be investigated for site contaminants of concern in the soil, groundwater, and soil gas (including methane). Also, please provide the location of this former pond on the site figures and if possible, provide the historical photo where it was identified.
2. Level I, Page 9, 1<sup>st</sup> paragraph – was soil in the area at the west end of the infeed decks where transformers were located sampled for PCBs or addressed by Weyerhaeuser? If not already addressed, then soil in this area needs to be sampled for PCBs and metals.
3. The Level I report identified several areas of anti-sapstain (pentachlorophenol) storage and/or use. Soils and possibly groundwater in these areas should be analyzed for pentachlorophenol and dioxin (a byproduct of penta) and other wood treating chemicals (if determined hazardous) historically used at the facility. Dioxin should be analyzed even if penta is not detected as it reacts differently in the environment and is often detected even in the absence of penta. These areas include:
  - the storage, mixing room, and equipment for treatment solutions on the west end of the planer building (Photos 17 & 19 of Level I),
  - a spray booth in the planar mill where anti-sapstain was applied,
  - a spray booth at the lumber exit of the planar where the chemical was applied (east side portion of planar mill),
  - the outfeed conveyor for lumber located on the north side of the planar building (Photo 16 of Level 1),
  - green chain exit and area on the east side of the sawmill where anti-sapstain was applied to lumber (sampled for penta, but not dioxin or other potential treatment chemicals), and
  - areas where treated lumber was dried and stored after anti-sapstain application.

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<sup>1</sup> PES Environmental, Inc., 2009 *Level I Environmental Site Assessment* and 2011 *Phase 2 Assessment Review and Data Evaluation Report*.

<sup>2</sup> Farallon Consulting, 2023 *Focused Subsurface Investigation*.

4. Level I, page 13, 1<sup>st</sup> paragraph – sediment sampling for contaminants of interest should be conducted in exposed areas of Ash Creek, Ash Creek outfalls, upstream area of Ash Creek (background) and any exposed ditches and their outfalls.
5. Level I, page 17, 1<sup>st</sup> paragraph – provide available documentation on the solid waste permit and the fill removal of the hillside waste fill.
6. Level I, general – review historical photos for locations of former hog fuel boilers and potential wigwam burners. These areas need to be investigated for contamination released during burning.
7. Level, Page 23, second to last paragraph and other text on site history identified historical agriculture land and orchards possibly on the site which could be sources of pesticides to the site. Historical pesticides are persistent and can remain as contaminants in the soil for years.
8. Level I, Page 27 and 28, discusses surface water runoff from the anti-sapstain areas and spill areas that flowed into catch basins onsite and then discharged to Ash Creek. These areas need further investigation to determine the location and if sampling is needed.

#### **Specific to Phase II, Focused Subsurface Investigation and Site Visit**

1. Metals analysis was not conducted on any of the samples. Metals are often associated with waste oils and should be analyzed in areas where used or waste oils could have been released including oils containing PCBs.
2. Please provide supporting documentation for the investigation work that was completed including soil boring logs and sampling forms.
3. At a minimum, DEQ requires that all sites (except for a few exempt situations) conduct a Tier I Exposure Pathway Assessment for potential ecological risks. Guidance on conducting the assessment can be found on DEQs public website at <https://www.oregon.gov/deq/Hazards-and-Cleanup/env-cleanup/Pages/ERA.aspx>.
4. During the site visit, significant staining was observed in the engine room on the north side of the planar building. This area needs to be cleaned, and subsequent subsurface sampling conducted for contaminants of concern

#### **Additional Questions (should be answered prior to addressing data gaps)**

1. Forestry shed was used for mixing pesticides and herbicides. Any idea what kind and what they were used for? Did they spray any areas of the ponds for mosquitos?
2. What is the chemical make-up and the carrier of the different anti-sapstains/wood treatments that were used including Diacon, Mycostat p20, cherry-tone stain, Kop-coat, NP-1 and Kop-coat Bazooka?