



# Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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Portland, OR 97232

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TTY 711

May 3, 2016

Kerry Rea  
Townsend Farms, Inc.  
23400 NE Townsend Way  
Fairview OR 97024

Dear Kerry:

DEQ has completed review of the document entitled "Incremental Sampling Investigation and Residual Risk Assessment: Surface Soil, dated March 22, 2016, prepared by EVREN Northwest on behalf of Townsend Farms, Inc. The report documents sampling performed on soil stored in the Interim Soil Management Unit (ISMU) created on Lot 6. DEQ approves this document with the following comments. Please revise the document to incorporate DEQ comments and send DEQ two copies of the final report for the administrative record.

Please revise Section 4 tables to present statistics to two significant digits.

Please re-check table and figure call-outs.

The RBC exceedance of dieldrin at DU6N for dieldrin corresponds to a  $1.2 \times 10^{-6}$  risk. As such, this does not exceed State standards after rounding to one significant figure. For ecological receptors, the levels of DDT and metabolites do not exceed the site specific screening values. Moreover, these do not exceed levels associated with a lowest observed adverse effect level (LOAELs) using US EPA methodologies. Similarly, the concentrations measured on DU6S are below applicable human health and ecological screening levels. Accordingly, DEQ has determined that risk from residual pesticides on lot 6 are currently below acceptable levels for workers and ecological receptors. If additional soil is placed on lot 6, conditions will change and will require re-assessment.

The metals concentrations in soil are consistent with background concentrations. EVREN Northwest calculated a 90<sup>th</sup> upper confidence limit of 34.6 mg/kg for copper. However this estimate is likely within the range of variability of sampling and analytical measurement and is not indicative of significant soil contamination or a significant exceedance of DEQs background estimate.

As documented in the report, and described in the preceding paragraphs, concentrations of hazardous substances in soil stored on lot 6 do not exceed acceptable risk levels for occupational workers or ecological receptors. Therefore, a protective cap is not required to maintain the ISMU. However, it is necessary to maintain the ISMU in stable condition and prevent erosion. Please seed and vegetate the soil pile as recommended in the report. Moreover, maintain erosion control fencing and other protective measures as described the approved soil management plan.

Please proceed with preparation of a workplan for groundwater investigation and a focused feasibility study as presented in our letter of March 16, 2016.

I can be reached at (503) 229-5614 if you have questions or comments.

Sincerely,

A handwritten signature in blue ink that reads "Paul Seidel". The signature is written in a cursive style with a large initial "P".

Paul Seidel  
Project Manager  
Cleanup and Site Assessment Section

cc: Scott Manzano, DEQ  
cc: Bob Williams  
DEQ NWR files, ECSI# 4320