



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

March 16, 2016

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

Dear Kerry:

Townsend farms Inc (TFI), recently submitted a final Interim Soil Management Plan and Final Sampling and Analysis Plan, both documents dated January 26th, 2016. Both documents have been previously approved by DEQ. I understand that sampling results have been received from the laboratory and sampling work is complete. It is our understanding that sampling results may be below applicable soil screening criteria, and TFI would like to propose not placing a soil cover over the Interim Soil Management Unit (ISMU) , since it may be unnecessary for protection of human health and the environment.

At this time, DEQ would like to see the soil management work completed, and work begin on the remaining project components identified in the remedial investigation, as well as the groundwater investigation. Accordingly, please prepare an estimated schedule for the following project items. DEQ appreciates that based on capacity, it may not be possible to work on each of these items simultaneously. Please consider work sequencing in the proposed project schedule. However, completion of documentation and recommendations for lot 6 is a top priority.

- 1) Prepare a final report or technical memorandum documenting the results of soil sampling performed on lot 6 for the administrative record. In the report, review options and make a recommendation for DEQ review regarding soil capping or cover on lot 6. Options may include planting and maintaining vegetated cover on existing soil surface, or new clean cover and vegetation. Please update your land use compatibility Statement (LUCs) given the new ISMU on lot 6. The LUC is available at: <http://www.deq.state.or.us/pubs/permithandbook/lucs.pdf>
- 2) Prepare a work plan for groundwater investigation. This is the first element of the investigation to understand the onsite source of ethylene dibromide (EDB).
- 3) In accordance with the 2007 voluntary program (VCP) agreement, please prepare a focused feasibility study consistent with OAR 340-122-0085 to begin the remedy selection to address the items identified in the remedial investigation (RI) as exceeding State acceptable risk levels. Because the remedies for the two areas identified in the RI are likely to be relatively straightforward, we envision this process to be streamlined and focused while including sufficient detail to support the remedy selection process and meet State requirements.

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" and a long, sweeping underline.

Paul Seidel
Project Manager
Cleanup Section

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