



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

January 14, 2016

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

Dear Kerry:

DEQ has completed review of the following two draft final documents:

- 1) Interim Soil Management Plan, prepared by EVREN Northwest, Inc. for Townsend Business Park Inc, dated December, 28 2015, and;
- 2) Sampling and Analysis Plan, Lot 6, prepared by EVREN Northwest, Inc. for Townsend Business Park Inc, dated December 28, 2015.

After revision to address the comments included in this correspondence, a portion of which were also transmitted by email correspondence on January 5th, 2016, and as modified as described in email correspondence from EVREN NW to DEQ on January 11th 2016, these two plans are approved. While prepared for lot 6, the soil management plan is suitable for use at other lots that may be redeveloped, subject to any periodic amendments or revisions deemed appropriate by Townsend Farms, Inc. and Oregon DEQ.

Section 6 of the Soil Management Plan should be modified to indicate annual reporting to DEQ on the status of the interim soil management unit on lot 6, as long as it exists, including the findings from the periodic inspections.

Table 3-1 in the Soil Management Plan and Table 2-1 in the Sampling and Analysis Plan require revision in accordance with comments below, also provided in email correspondence on January 5th, 2016. The tables should include a footnote to indicate that they summarize data only for lots planned for redevelopment and do not summarize all data collected during the remedial investigation.

The following metals were detected above clean fill screening criteria (CFSL) at the following locations:

Lot 2: Copper.
Lot 6 Burn pile: Antimony, Cadmium, Copper, Lead, Selenium.
Lot 11: Copper.
Lot 21: Cadmium, Copper, Selenium.

The following organochlorine pesticides were detected at the following locations:

Lot 2: beta- BHC detected, methoxychlor detected (with L-qualifier)
Lot 6 Burn pile: Beta-BHC detected, Endrin detected below reporting limit.
Lot 11: Heptachlor epoxide, Endrin aldehyde, Endosulfan sulfate detected.
Lot 15: DDD, DDE, DDT detected above CFSL, Endosulfan isomers, Endrin, beta and gamma-BHC, Heptachlor and chlordane detected.
Lot 20: Endosulfan sulfate detected, Endrin detected below reporting limit.

Please include the full method 8081 analyte list in the analytical program, and add the additional metals detected above CFSLs to the analytical program.

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, flowing style.

Paul Seidel
Project Manager
Cleanup and Site Assessment Section

cc: Keith Johnson, DEQ
cc: Bob Williams
DEQ NWR files, ECSI# 4320