



Oregon

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September 29, 2016

via electronic delivery

Mike and Margaret Townsend
Townsend Farms, Inc.
23400 NE Townsend Way
Fairview OR 97024

Re: Townsend Farms Business Park, ECSI# 4230

Mr. and Mrs. Townsend:

DEQ Northwest Region Cleanup Section staff reviewed the document entitled "*Townsend Farms – EDB Addendum lot 11, and well head at south entrance*" dated August 26th 2015, prepared on your behalf by Rapid Soil Solutions, LLC. The purpose of this letter is to provide comment on that document.

The submitted document provides a very brief summary of the results of soil and groundwater sampling completed on the property (for ethylene dibromide or EDB). It also presents an analysis of groundwater elevation information from the area, and concludes that EDB has not "accumulated in the soils" on the property, groundwater flow is northerly, and therefore not a source of contamination to city of Fairview supply wells located to the south.

Two main problems with the submitted document: 1) investigation work was completed without consultation with DEQ, which is inconsistent with the voluntary cleanup agreement entered into with DEQ in 2007; and 2) there are numerous technical problems or deficiencies with the submittal. These problems are discussed in the following paragraphs.

Completion of Work Independent of DEQ. DEQ was not aware that this work was planned or in progress until receiving the document on August 28th, 2015. Within the DEQ voluntary cleanup (VCP) program, work is performed under various agreements. In the case of Townsend Farms, Inc. and DEQ, work is performed under provisions of the 2007 agreement number LQVC-NWR-07-02. Sections II.A.3, II.F and II.K of the agreement discuss the agency review requirements in more detail. In accordance with such agreements, it is typical to prepare workplans for DEQ review and approval prior to completion of site work, and in particular where field work that involves sampling, preparation of sampling and analysis and quality assurance plans. The purpose of this review is to ensure that proposed work will meet the objectives (goals) for which it is intended, and confirm that the resulting analytical data can be evaluated for consistency with agency quality assurance (QA) requirements. Moreover, it allows DEQ to provide advice, recommendations and concurrence on the proposed scope of work and methods. For reference, the current agency QA policy applicable to DEQ VCP program requirements may be found in *EPA PA/SI Investigations Quality Assurance Project Plan* dated August 14, 2012. <http://www.deq.state.or.us/lq/pubs/docs/cu/QualityAssuranceProjectPlanEPAPASIIInvestigations.pdf>

Technical Deficiencies: Testing and documentation

- The purpose (and adequacy) of soil sampling is not discussed. Six shallow soil samples from the former Lot 11 do not rule out the site as a source of contamination to underlying groundwater.
- Groundwater purging and sampling methods, sampling equipment used, sample collection depth, etc., are not presented, making it impossible to evaluate the representativeness of the data. DEQ also notes

that the reporting limit for contaminant analysis in the Apex report is an order of magnitude higher than US EPA's drinking water standard (MCL) for EDB.

- There is no discussion of field and laboratory QA/QC measures, including whether generated data are of acceptable quality.
- Included figures are poorly-prepared, and lacking important elements such as north arrows, scales, sample identifiers, source of the base maps, etc.
- Groundwater elevation and flow analysis is based on disparate data sources, and does not acknowledge potential confounding factors including influence on gradients from local pumping wells.
- Focus is on off-site supply well EP-B (City of Fairview #6), which is currently inactive. Other nearby wells including nearby (active) well #5 are not discussed.
- The letter references "RSS research" on likely sources of EDB in groundwater without any supporting documentation.

The information presented is insufficient to either include or exclude the site as a source of EDB contamination to both the (private) onsite well, or nearby supply wells in the vicinity. We understand that additional information is being prepared that may shed light on the contaminant attribution issue. DEQ will review the document and provide comments once submitted. Thank you for the opportunity to comment.

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

Respectfully,



Paul Seidel
Project Manager
NWR Cleanup Section

Ec: Keith Johnson, DEQ
Bob Williams, DEQ
Dan Hafley, DEQ

Cc: DEQ NWR files, ECSI# 4320