



Oregon

Theodore R. Kulongoski, Governor

Department of Environmental Quality

Northwest Region - East Side Office
1550 NW Eastman Parkway, Suite 290
Gresham, Oregon 97030
(503) 667-8414
Fax: (503) 674-5148

October 24, 2008

Jeff Townsend
Townsend Farms
23303 NE Sandy Boulevard
Fairview OR 97024

Re: Townsend Business Park
ECSI #4230

Dear Mr. Townsend:

The Department of Environmental Quality (DEQ) has reviewed the "Sampling Recommendation Memorandum" dated September 22, 2008, submitted by GeoDesign and Pascoe Environmental Consulting on your behalf. The memorandum is approved for implementation, no additional correspondence is needed prior to execution of the recommended work. Completion of a draft human health and Level II ecological risk assessment and completion of a revised remedial investigation (RI) report that includes the risk assessments and other appropriate RI elements specified in OAR 340-122-0080. DEQ has the following comments regarding the proposed sampling and preparation of the RI report.

General Comments

DEQ concurs with the scope of work proposed in the memorandum. In particular, we agree with points made by Pascoe Environmental Consulting with regard to adequacy of detection limits for the additional sampling. DEQ anticipates that advance coordination with the analytical laboratory will be essential to achieve the necessary limits. If the specific compounds of interest are identified to the laboratory prior to analysis, the laboratory may be able to achieve better than usual instrument-specific detection limits. These detection limits should be reported in addition to the usual reporting limits. Additional samples at lower detection limits will improve the reliability of any exposure point calculations or confirm the absence of detections at risk-based levels.

DEQ comments in the July 15, 2008 letter must be addressed in the revised RI report.

Specific Comments

1. The sampling proposed in the lowland area is potentially adequate for delineation of impacts in this area, assuming adequate detection limits are achieved for screening level risk assessment. When preparing the RI report, it should be noted that delineation and screening risk assessment are the primary and secondary objectives of this sampling, respectively. DEQ would like to note that dependent on the results, some additional sampling in this area could be necessary;
2. With respect to the fish consumption pathway, Fairview and No Name Creeks discharge to Fairview Lake, Fairview Lake discharges to the Columbia Slough. The fish consumption pathway is complete at these locations. However, it is uncertain if the locality of facility (LOF),



as defined in OAR 340-122-0115 might extend this far. The data reported in the May 2008 draft RI report suggest that it does not, but as discussed in the sampling recommendation memorandum, the detection limits do not clearly rule this out. Previously collected data at location CS-1 are not consistent with other samples. Therefore, the objective of the additional sampling should be to support a decision with regard to whether the LOF does or does not extend into Fairview and No Name Creeks and potentially further down gradient;

If a determination is made that the LOF does extend into one or both of these creeks, but not as far as Fairview Lake, then a determination needs to be made regarding the potential presence of fish relative to whether the human exposure pathway is potentially complete, and the significance of that portion of the LOF for ecological risk assessment. Specifically, it would likely be necessary to screen against criteria relevant for benthic organisms, and perform some risk calculations to assess significance for aquatic-dependent wildlife. If no pesticides are detected above screening-level values and detection limits achieve SLVs, then a conclusion that the LOF does not include the creeks may be supported and included as a figure in the RI report;

3. The memorandum briefly discusses why aquatic exposure pathways are incomplete in the lowland area. As stated in comments #2 and #3 of the July 15, 2008 DEQ letter, additional information on process water management and what happens to this process water is needed. Is there a path for this water to reach Blue or Fairview Lakes? The basis for an incomplete exposure pathway needs to be supported;

I am available to discuss the scope of risk assessment in more detail or answer any questions you may have. My phone number is (503) 667-8414 x55002.

Sincerely,



Paul Seidel
Project Manager

cc: Bob Belding, GeoDesign
Jason O'Donnell, GeoDesign
Bruce Gilles, DEQ
Robert Williams, DEQ