

January 22, 2026

Oregon Department of Environmental Quality
4026 Fairview Industrial Drive Southeast
Salem, Oregon 97320

Attention: Nancy Sawka (Nancy.Sawka@deq.oregon.gov)

Subject: Response to DEQ Comments on Work Plan
Project Number: DallasMill-1-02
Dallas Mill Properties
ECSI File #6710
1551 Southeast Lyle Street
Dallas, Oregon

INTRODUCTION AND PROJECT BACKGROUND

Central Engineering Services (Central) is pleased to provide this response letter, on behalf of Dallas Mill Properties, LLC, to Oregon Department of Environmental Quality (DEQ). The letter responds to comments provided by DEQ in an email dated January 6, 2026 (2026 DEQ Comments), which are included as an attachment to this letter. The 2026 DEQ Comments were related to the Voluntary Cleanup Program Work Plan prepared by Central and dated December 1, 2025 (2025 Work Plan) for the Former Weyerhaeuser Dallas Mill property at 1551 Southeast Lyle Street in Dallas, Oregon (Site; Figures 1 and 2).

The 2026 DEQ Comments are presented below, followed by Central's response in *blue italics*.

RESPONSE TO COMMENTS

1. If the smaller log pond area on Figure 3 was also infilled, a boring should probably be added at that location.

The historical smaller pond area is in the vicinity of the present-day Ash Creek, which is primarily culverted and daylights in a few areas across the Site. Based on the aerial photographs, the area was generally a creek inlet connected to the pond. However, in some aerial photographs, the creek appeared to be wider or flooded, likely influenced by the connecting pond, and the outline in Figure 3 shows the approximate maximum extent of the inlet. Based on this information, the depth of fill material is likely limited compared to the pond and it is unlikely we would be able to identify a native pond sediment layer in the area. To characterize the limited fill material, Central proposes advancing an additional boring, CESB-17, within the footprint of the historical small log pond area as shown on Figure 3 (revised and attached to this letter), and collecting one discrete soil sample of the fill material to be analyzed for the following:

- *Diesel- and oil-range organics (DRO/ORO) by Method NWTPH-Dx;*
- *Polycyclic aromatic hydrocarbons (PAHs) by U.S. Environmental Protection Agency (EPA) Method 8270E; and*
- *Waste oil metals, to include cadmium, chromium, and lead, by EPA Method 6020B.*

The sampling depth will be determined in the field based on evidence of impacts and depth of fill material.

2. Please add DDT to the log pond sample analysis as we discussed previously. Composites similar to dioxin/penta would be acceptable.

The proposed composite log pond sediment sample will be analyzed for DDT by EPA Method 8081B.

3. Please make sure Cd and Cr are included in the Ag metals for analysis.

Both total cadmium and chromium will be analyzed as part of the agricultural metal suite by EPA Method 6020B.

4. To cover more area, suggest adding two more sample points in the green chain area in addition to CESB-09 and collecting a composite from the three for the dioxin analysis. CESB-09 could still be used for collecting one discrete sample for penta and formaldehyde.

Three borings will be advanced along the green chain area (CESB-09a – 09c; see Figures 3 and 4) and soil samples will be collected approximately 1 foot below ground surface (bgs) or deep enough to collect the top 6 inches of recoverable soil. Soil from all three borings will be composited into one sample and analyzed for dioxins and furans by EPA Method 1613.

A discrete sample will be collected from CESB-09a and analyzed for:

- *Pentachlorophenol by EPA Method 8270E;*
- *Propiconazole by EPA Method 8321; and*
- *Formaldehyde by EPA Method 8315A.*

5. Did the boilers that burned wood have an emissions stack? If so, a composite surface soil sample should be collected around this area and analyzed for dioxins and metals.

It is our understanding that the hog fuel burner did have an emissions stack. However, Dave Williams, President of NorthWest Demolition, stated that Weyerhaeuser (prior owner) only used clean sawdust for the hog fuel burner. According to Dave Williams and other contacts at NorthWest Demolition, as a common industry standard, Weyerhaeuser would not accept other combustible materials or treated wood products for boiler fuel from either outside sources or their own Site operations.

6. Are there any other known treatment chemicals used that should be tested for?

Based on the Phase I ESA prepared by PEL and reviewed by Weyerhaeuser, all known treatment chemical operations, including application and storage areas, have been identified on the Site.

7. I don't see where you would be collecting field QA/QC samples.

Quality Assurance/ Quality Control (QA/QC) samples were not proposed in the Work Plan, as the field investigation was originally conceived as an independent action.

We propose collecting field duplicates at a frequency of 10 percent for analytes with at least five proposed samples per media. This would include DRO/ORO, PAHs, waste oil metals, PCBs, dioxins/furans, and pentachlorophenol for soil samples and DRO/ORO and waste oil metals for groundwater samples.

Field duplicates will be collected in the same manner and at the same locations and times as the primary samples. These samples will be used to evaluate the accuracy and precision of the field sampling techniques, and sample representativeness. The duplicate samples will be submitted to the analytical laboratory and labeled with the prefix "DUP" and without specifying the location being duplicated. Information pertaining to the duplicate sample locations will be recorded on a field note

form. Central will use the field duplicate data to calculate the relative percent difference (RPD). The RPD for results greater than 5 times the reporting limit must be less than 50 percent. The RPD for results that are less than 5 times the reporting limit must be less than +/- 2 times the reporting limit. If either of these criteria are exceeded, the detected result will be qualified as estimated values.

CLOSING

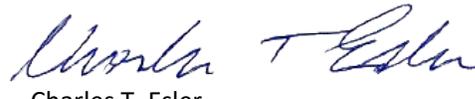
We hope this response to comments and the revisions outlined herein are acceptable to DEQ. Please contact the undersigned with any questions or additional comments.

Respectfully,

Central Engineering Services



Megan Masterson, R.G.
Senior Geologist



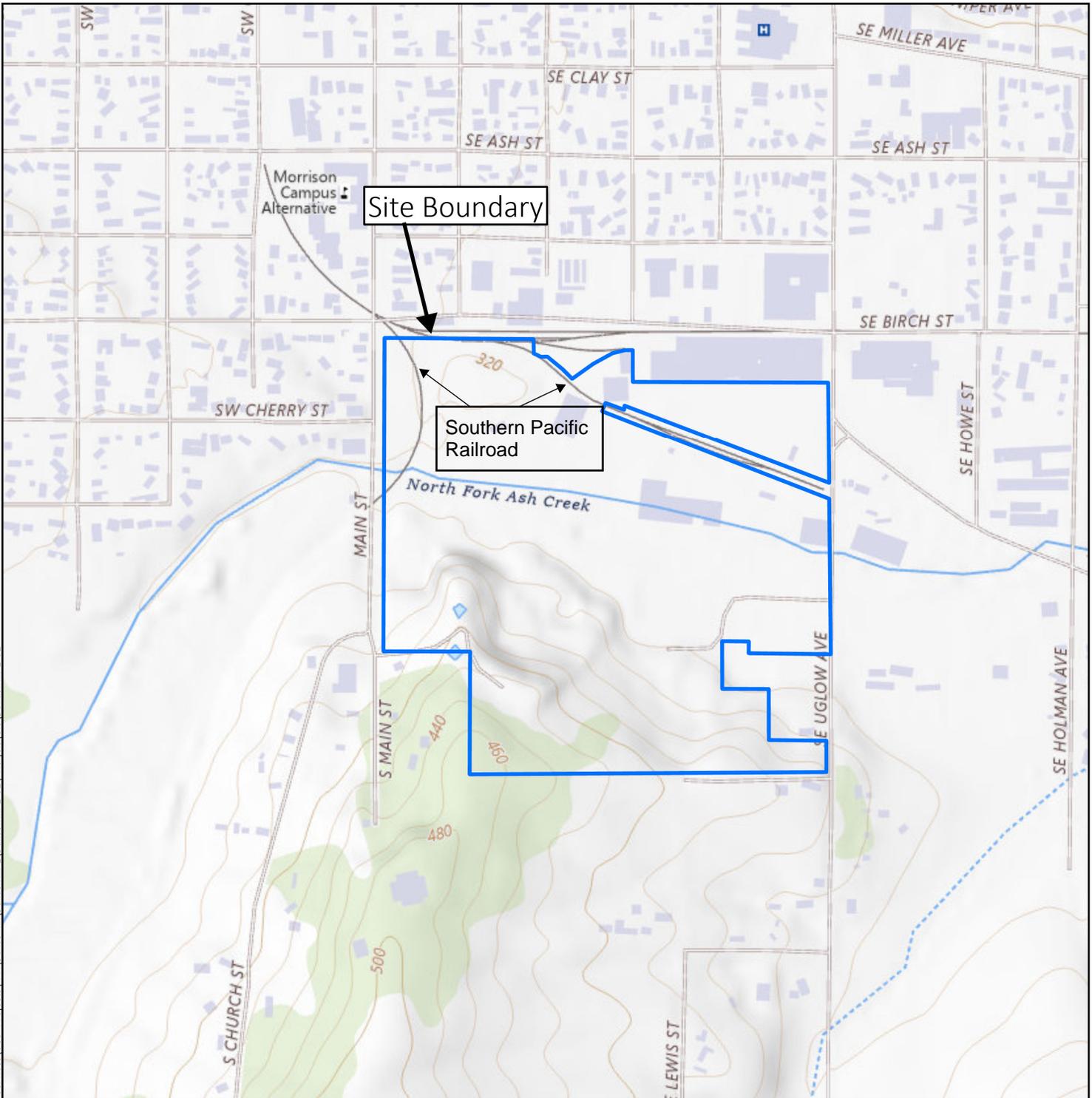
Charles T. Esler
Principal Scientist

Attachments:

- 2026 DEQ Comments
- Figures



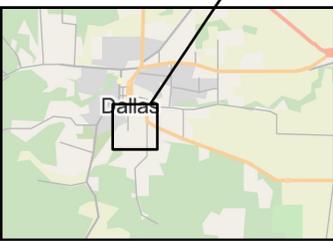
2026 DEQ Comments



Site Boundary

Southern Pacific Railroad

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DallasMill-1-02	
Site Location	
1551 SE Lyle Street, Dallas, OR	
	Figure 1

USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road data; Natural Earth Data; U.S. Department of State HIU; NOAA National Centers for Environmental Information. Data refreshed October 27, 2025. Map data © OpenStreetMap contributors, Microsoft, Facebook, Inc. and its affiliates, Esri Community Maps contributors, Map layer by Esri



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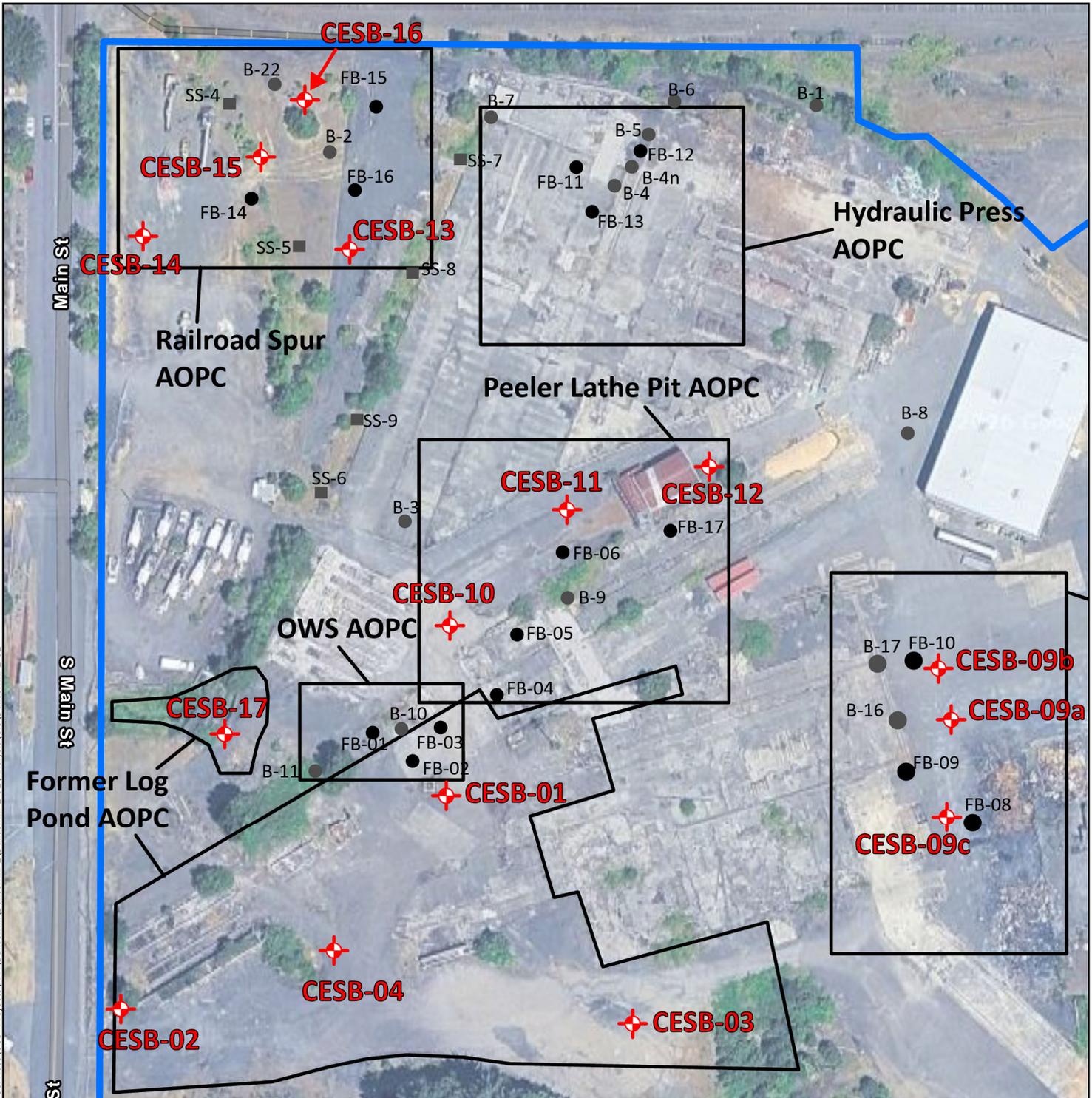
Legend

- Approximate Site Boundary
 - Area of Potential Concern (AOPC)
 - Ash Creek
- OWS = oil/water separator



DallasMill-1-02	
Site Areas of Potential Concern	
1551 SE Lyle Street, Dallas, OR	
CENTRAL ENGINEERING SERVICES	Figure 2

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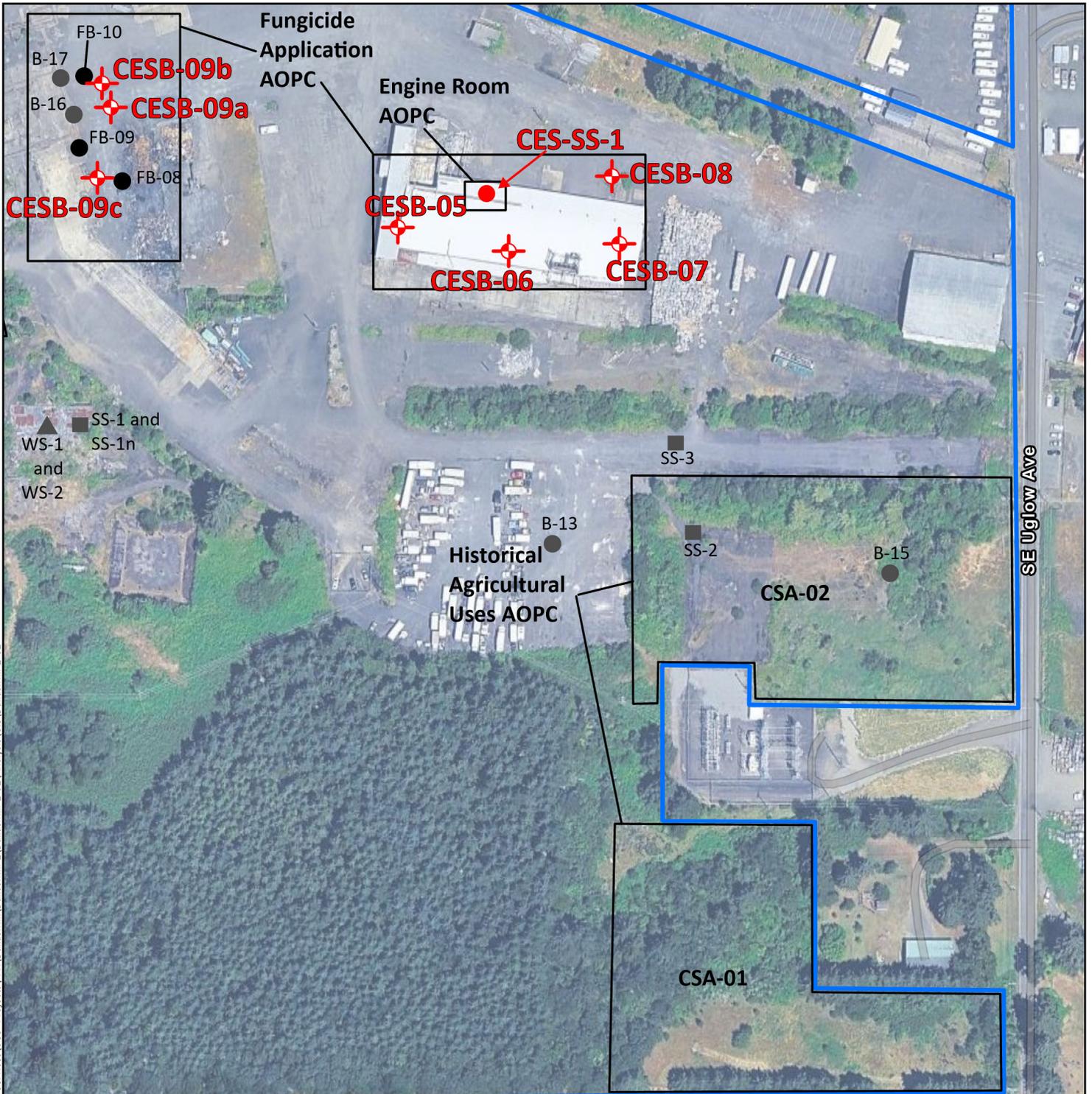
Legend

- Approximate Site Boundary
- Area of Potential Concern (AOPC)
- ✦ Proposed Boring
- Soil Boring (PES Environmental, INC., 2011)
- Surface Sample (PES Environmental, INC., 2011)
- Soil Boring (Farallon, 2023)

Sources: © OpenStreetMap (and) contributors, CC-BY-SA, Esri Community Maps Contributors, Oregon Metro, Oregon State Parks, State of Oregon GEO, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, USFWS



DallasMill-1-02	
AOPCs with Proposed Sample Locations	
1551 SE Lyle Street, Dallas, OR	
CENTRAL ENGINEERING SERVICES	Figure 3



Legend

- Approximate Site Boundary
- Area of Potential Concern (AOPC)
- Proposed Surface Sample
- ⊕ Proposed Boring
- Soil Boring (PES Environmental, INC., 2011)
- Surface Sample (PES Environmental, INC., 2011)
- ▲ Wipe Sample (PES Environmental, INC., 2011)
- Soil Boring (Farallon, 2023)

0 600
Feet



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Figure 4



Figures

Megan Masterson

From: SAWKA Nancy * DEQ <Nancy.SAWKA@deq.oregon.gov>
Sent: Tuesday, January 6, 2026 4:41 PM
To: Megan Masterson; 'Peter Cairns'
Cc: 'rwayper@nwdemolition.com'; Charles Esler
Subject: RE: Former Weyerhaeuser Dallas Mill - VCP Investigation Work Plan

Follow Up Flag: Follow up
Flag Status: Flagged

One question I forgot. I didn't see where you would be collecting field QA/QC samples. Did I miss that somewhere?

From: SAWKA Nancy * DEQ <Nancy.SAWKA@deq.oregon.gov>
Sent: Tuesday, January 6, 2026 3:16 PM
To: 'Megan Masterson' <meganm@centralengr.com>; 'Peter Cairns' <cairnpeterl@gmail.com>
Cc: 'rwayper@nwdemolition.com' <rwayper@nwdemolition.com>; Charles Esler <charlese@centralengr.com>
Subject: Former Weyerhaeuser Dallas Mill - VCP Investigation Work Plan
Importance: High

Thank you for the submittal of the revised January 6, 2026, Voluntary Cleanup Program Work Plan for the Dallas Mill Site, Cleanup Project #6710. I appreciate all the work you put into the workplan and found it clear, complete and easy to follow. I finished my review and have the below questions and comments. Any needed revisions can be done as an addendum or response to comments instead of revising the entire report.

1. If the smaller log pond area on Figure 3 was also infilled, a boring should probably be added at that location.
2. Please add DDT to the log pond sample analysis as we discussed previously. Composites similar to dioxin/penta would be acceptable.
3. Please makes sure Cd and Cr are included in the Ag metals for analysis.
4. To cover more area, suggest adding to more sample points in the green chain area in addition to CESB-09 and collecting a composite from the three for the dioxin analysis. CESB-09 could still be used for collecting one discrete sample for penta and formaldehyde.
5. Did the boilers that burned wood have an emissions stack? If so, a composite surface soil sample should be collected around this area and analyzed for dioxins and metals.
6. Are there any other known treatment chemicals used that should be tested for?

Please let me know if you'd like to discuss or have any questions.

Nancy Sawka

Nancy Sawka, RG (she/her)
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