State of Oregon
Department of Environmental Quality Memorandum

Date: March 11, 2026

To: FILE

Through: Brad Shultz (Manager), Bruce Scherzinger (Lead Worker), Kaley Major (Toxicologist)

From: Tina Elayer (Project Manager)
Western Region

Subject: Amity Oaks ECSI # 6589; Staff Memorandum in support of a No Further Action determination

This document presents the basis for the Oregon Department of Environmental Quality's (DEQ's) recommended No Further Action (NFA) determination for the Amity Oaks site (Site), in Amity. As discussed in this report, contaminant concentrations in soil are below acceptable risk levels.

The proposed NFA determination meets the requirements of Oregon Administrative Rules Chapter 340 Division 122, Sections 010 to 0140; and ORS 465.200 through 465.455.

The proposal is based on information documented in the administrative record for this Site. A copy of the administrative record index is presented at the end of this report.

1. BACKGROUND

Site location.
The Site's location can be described as follows:

- Address: 1204 Oak Street, Amity, Yamhill, Oregon 97218.
- Latitude 45.11018º North, longitude -123.20405º West
- Map and Tax lot R5429AC 00700,Township 5 South, Range 4 West, Section 29

Site setting.
Total property is 9.80 acres, and there are no structures on the Site. Most recent operations included dryland agriculture. Adjacent properties to the north and east are family residential developments. Property to the south and west is a mix of agricultural land with single family residential developments and a Kroenig Tractor Supply business. Site is surrounded by the Ash Swale (low-lying or depressed and often wet stretch of land) on the south and west side. Land is zoned as 100 Residential Vacant.

Physical setting.
Site elevation is approximately 156 feet above mean sea level (amsl). General gradient of the Site slopes to the west. Site is located within the Willamette Valley physiographic province in an elongated basin extending southward from the Canadian border in Washington to Central Oregon. The Willamette Valley is characterized by unconsolidated beds of sand and gravel deposited during the last period of glaciation. The main soil type is Wapato Silty Clay Loam, comprising approximately 90 percent of the map unit. Inferred direction of the groundwater is to the west with static water level expected to be encountered at approximately 5 to 14 feet below ground surface (bgs). The closest surface water feature, Ash Swale, is located immediately adjacent to the west and south of the Site, approximately 70 feet in some areas.

Site history.
The Site was developed with a single-family residential dwelling from 1926 until demolition by city permit in 2020. The Site had multiple uses since 1936 including an orchard, agricultural land, and outbuildings until at least 1958. By 1954 it appears on aerial maps that most of the orchard land was replaced by dryland agricultural and several structures removed. The remaining small-scale orchard was no longer shown on environmental data resources (EDR) maps by 1982. The Site has remained vacant as undeveloped land since 2020.

2. BENEFICIAL LAND AND WATER USE DETERMINATIONS

Land use.
Community Home Builders (CHB), formerly Yamhill Community Development Corporation, is a private non-profit organization that has been building homes and investing in rural communities for over twenty-eight years. The Site was purchased by CHB and is in the process of being prepared for thirty-five (35) single family residential homes, roads, and associated infrastructure. CHB is working with multiple agencies to secure funding for infrastructure, remediation, and impacted soil removal from the legacy orchard and agricultural uses. The land is currently zoned for residential use.

Groundwater use.
Potable water for the Site and surrounding area is supplied by the City of Amity. The city collects surface water from wells by the Yamhill River.

Surface water use.
Ash Swale flows into Salt Creek, which then flows into the South Yamhill River located over three miles to the northwest. Stormwater generated at the Site directly infiltrates into the subsurface. There are currently no stormwater drainage systems at the Site. Site development plans include a stormwater facility to be located on the south side of the Site. There are plans for the stormwater to be collected from the street stormwater drains and then discharged into the stormwater retention basin.

3. INVESTIGATION AND CLEANUP WORK

Green Environmental Management (GEM) conducted a Phase I environmental site assessment (ESA) for the Site in the summer of 2023. The Phase I found the following recognized environmental condition (REC), past agricultural or orchard use may have impacted the subject property. The Phase I was followed by a Phase II ESA in November 2023 to determine whether the past agricultural and orchard use has impacted the subject property (Site).

The Phase II work included advancing 28 direct-push soil borings in pre-planned locations across the Site which was divided into seven (7) 1-acre zones (Zones 1-7). Each zone was further divided into quarter-acre subzones (a-d) for a total of approximately twenty-eight (28) ¼ - acre sampling quadrangles. Figure 1 shows the zones and subzones.

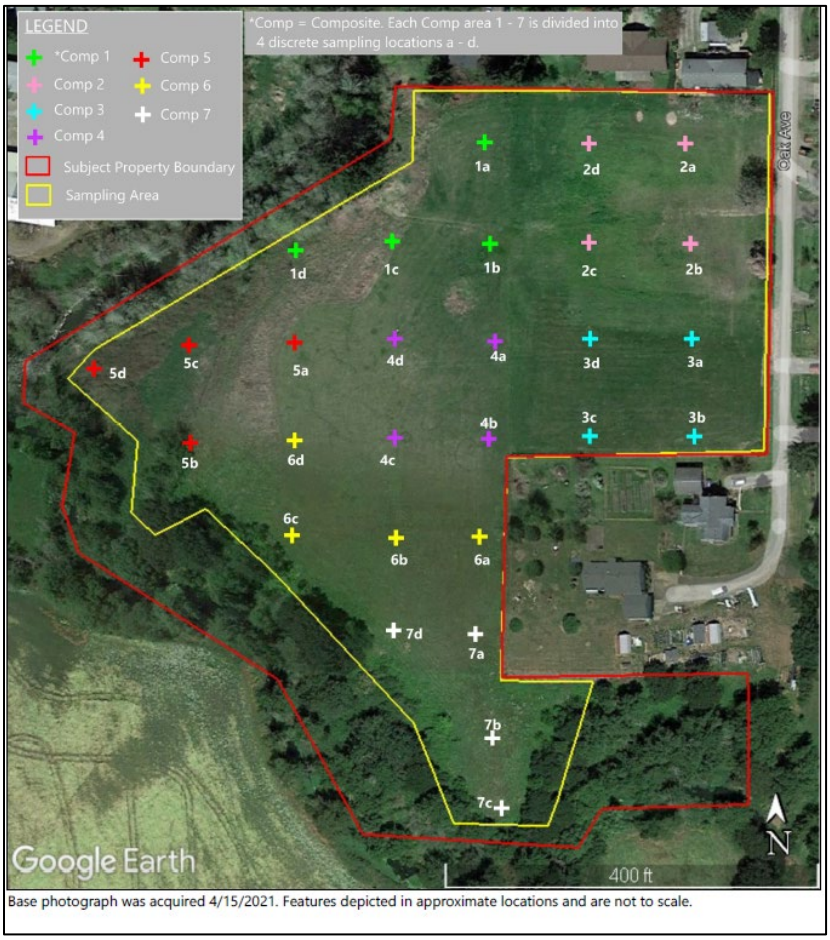


Figure 1: Zones and subzones (Retrieved from PII ESA, GEM, 11/20/2025).

A total of 56 discrete soil samples were collected from the 28 soil borings: a “shallow” sample from 0 – 6 inches bgs and a “deep” sample from 2 – 3 feet bgs from each boring. The discrete soil samples were grouped by zone and depth into seven (7) deep composite soil samples and seven (7) shallow composite soil samples. The composite soil samples were designated by Zone and relative depth, e.g. “1-comp shallow” and “1-comp deep”.

Seven (7) shallow soil samples were submitted to the lab for multi-residue pesticides analysis using modified EPA methods 8270D, 8321B, and total arsenic/lead by EPA 6020A (ICPMS). The remaining seven (7) deep composite samples and fifty-six (56) discrete soil samples were placed on hold at the lab.

Six (6) pesticides and pesticide residues analytes were detected in the samples. Dieldrin was detected at concentrations exceeding risk-based concentrations (RBCs) in samples 1-comp and 2-comp shallow. Based on those findings the on-hold samples 1-comp deep and 2-comp deep were ordered for dieldrin analysis using EPA Method 8081B. An addendum was issued by GEM to the Phase II report in November 2023 that presented the results of the additional analysis.

The additional analysis found no detections of dieldrin above the laboratory method reporting limits (MRLs) of 2.33 and 2.38 micrograms per kilogram (µg/Kg) respectively; well below the most stringent applicable residential RBCs of 34 µg/Kg (Soil Ingestion, Dermal Contact and Inhalation, RBCss) and 10 µg/Kg (Leaching to Groundwater, RBCsw).

GEM concluded that the dieldrin impacts above RBCs were found to be constrained to the upper six (6) inches to two (2) feet bgs across zones 1 and 2, approximately most of the northern portion of the Site. GEM recommended resampling the shallow discrete (0-6") soil samples at each of the Zone 1 and 2 locations (a-d), for a total of eight (8) discrete soil samples for dieldrin analysis.

The analytical results found exceedances of RBCs for four (4) of the eight (8) newly collected shallow discrete samples. Samples 1c-re, 2b-re, 2c-re, and 2d-re were found to exceed the dieldrin RBCsw. Sample 1b-re was non-detect for dieldrin; however, the reporting limit was slightly higher than the leaching RBC, therefore, an exceedance could not be ruled out. Only 1c-re, 2b-re, and 2d-re were found to exceed the direct contact RBCss of 34 µg/Kg. The analytical results additionally found exceedances of the dieldrin clean fill criteria for samples 1a-re, 1c-re, 2b-re, 2c-re, and 2d-re. Based on the results of the additional sampling and analysis, the DEQ project team had determined additional sampling and analysis was required. DEQ determined data gaps existed for vertical horizons that were not analyzed. On this basis, GEM prepared a Data Gaps Assessment Work Plan for the additional DEQ-required sampling and analysis.

The previously used term "Zone" was replaced by decision units (DUs), the former Zones 1-7 were replaced by DU1 through DU7. DEQ recommended additional stepwise sampling; specifically, the collection of forty-four (44) composite soil samples from forty-eight (48) sampling points, including the breakdown of DU2 into four (4) quarter-acre zones for four (4) -point sampling (DU2a, DU2b, DU2c and DU2d); four (4) -point resampling of DU1, DU5, DU6 and DU7; with the addition of four (4) point composite creek bank samples: SB1, SB5, SB6 and SB7. Additionally, DEQ required three (3) discrete creek sediment samples (Swale Sed Down, Swale Sed MID and Swale Sed UP).

The data gap assessment soil sampling was conducted over a three-day period in October 2024. GEM advanced thirty-two (32) direct-push soil borings to three (3) feet bgs in pre-planned and staked locations at the Site. Borings were parsed into eight DUs, each with four (4) subgroups.

A total of 128 DU discrete soil samples were collected from the thirty-two (32) soil borings: four (4) per boring (0-6", 6"-1', 1'-2' and 2'-3').

A total of sixty-four (32 samples plus duplicates) discrete swale bank sediment samples (four each from SB1, SB5, SB6 and SB7) were collected by the grab method. Six (3 samples plus 3 duplicates) discrete swale sediment samples were collected by the grab method (SS UP [downstream], SS Mid and SS Down [upstream]). Swale bank and creek sediment samples were collected via kayak.

A total of 36 composite soil samples were compiled in the field. DU2 was parsed into ¼ acre decision units, notated 2a, 2b, 2c and 2d, which were each further divided into four units (2a1, 2a2, 2a3, 2a4, etc.). Each of the resultant sixteen (16) subdivided DU2 units was sampled at depths of 0 – 6", 6" -1', 1' – 2' and 2'-3' (using a 4-point composite) resulting in four (4) composite soil samples per depth zone. The discrete soil samples were collected into clean laboratory supplied 8-ounce jars and were immediately labeled. Fresh nitrile gloves were used for each new discrete grab sample and for each composite sample. Composite soil samples were composed by adding approximately 2 ounces of soil from each jar per set of discrete soil samples to a new clean 8-ounce jar (e.g., Comp-1 shallow was compiled from 2 ounces each of 1a-shallow, 1b-shallow, 1c shallow and 1d-shallow).

At 45 µg/Kg dieldrin, the October 2023 Phase II soil sample 2-comp shallow was shown to exceed the residential direct contact RBCss of 34 µg/Kg. Resampling and analysis (November 2023) at each of the ¼ acre shallow (0 – 6") sampling points of DU1 and DU2 found dieldrin more than the residential direct contact RBCss in samples 1c-re, 2b-re and 2d-re. The result for 1c-re was 38.7 µg/Kg dieldrin, which only slightly exceeded the RBCss of 34 µg/Kg.

DU2 was further characterized in October 2024. Soil samples 2a Comp 6"-1', 2b Comp 6"-1', 2c Comp 6"-1' and 2d Comp 6"-1' were analyzed for dieldrin via EPA Method 8081B. The dieldrin analytical results were found to range from <2.17 to 20.1 µg/Kg. This result constrains exceedance of the direct contact residential RBC for dieldrin in DU2 to the upper 6 inches of soil across DU2, and possibly the upper 6 inches of DU1c (38.7 µg/Kg).

It was determined that based on the aggregate results for all pesticides sampling and analysis to date that there were three (3) ¼-acre DUs exceeding human health RBCss. Dieldrin exceeded the RBCss of 34 µg/Kg in units 1c, 2b and 2d. The 1c-re result only slightly exceeds the RBC. The dieldrin exceedances are constrained to the upper 6-inches of soil over the ¼-acre decision units. Arsenic exceeded respective background concentrations and residential direct contact RBCss in DU 2 sample 2c Comp 0-6". Lead also exceeded the residential RBCsw in all DU2 samples from 0-6" bgs although this pathway is considered incomplete because of the lack of a beneficial water use.

Figure 2 illustrates DEQ's general human health recommendations for the area of concern (AOC) in DU2. Note DU2 was further divided into approximate ¼ acre polygons identified as DU2b, DU2c, and DU2d.

These three DU2 sub-units were found to have concentrations of contaminants that exceed applicable human-health RBCss.

Specifically:

- Arsenic at 22.3 mg/Kg in unit DU2c from 0 – 6” bgs;
- Lead at 107 mg/Kg (DU2b) and 150 mg/Kg (DU2c) from 0 – 6” bgs;
- Dieldrin at 161 µg /Kg in DU2b from 0 – 6” bgs; and,
- Dieldrin at 259 µg /Kg in DU2d from 0 – 6” bgs.

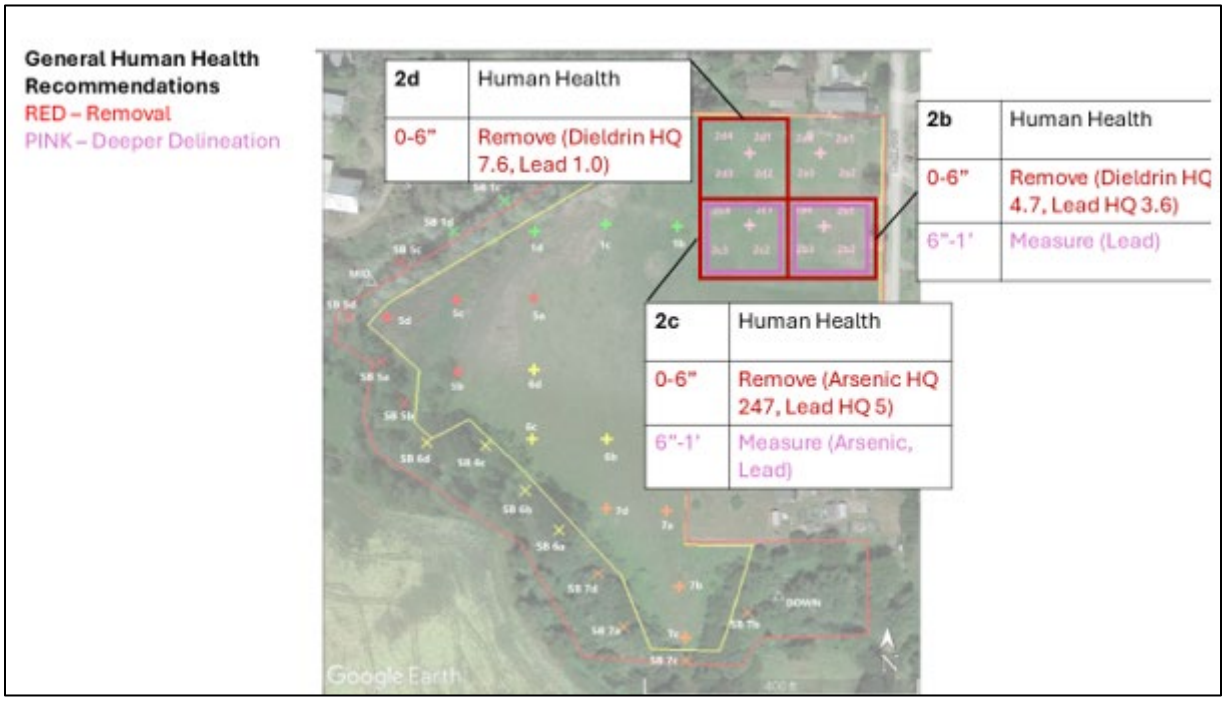


Figure 2: General Human Health Recommendations for impacted soil in AOC (DEQ Response Data Gaps Evaluation, 2/20/2025).

Following DEQ’s recommendations GEM oversaw the excavation and removal of the upper 6” of soil across the approximately ¾ acre AOC at the Site. The remedial action took place over a nine (9) day period beginning on September 11, 2025.

DU2b, DU2c, and DU2d impacted soil was completely removed to a 6” vertical datum across the AOC by September 18, 2025. A total of 930.81 tons of impacted soil was removed from the AOC and disposed of at the Coffin Butte landfill in Benton County.

Per DEQ’s request GEM collected eight (8) discrete delineation soil samples on September 18, 2025, from the excavation floor, representing the 6” – 1’ samples in the DU subunits, DU2b1, DU2b2, DU2b3 and DU2b4 (DU2b4 was combined to make Comp DU2b 6”-1’). DEQ required this additional delineation due to the previous exceedances of the residential RBCss for arsenic (18 mg/Kg) and lead (100 mg/Kg).

Two (2) sets of four (4) discrete soil samples were combined into two (2) composite soil samples: DU2c 6”-1’ and DU2b 6”-1’. The samples were submitted to Apex lab using EPA Method 6020B. 2c Comp 6”-1’ soil sample result for arsenic was 5.75 mg/Kg and for lead was 27.9 mg/Kg. 2b Comp 6”-1’soil sample result was 149 mg/Kg for lead. GEM requested the lab analyze the four (4) discrete soil samples that went into 2b Comp 6”-1’ (2b1, 2b2, 2b3, and 2b4). Results ranged from 19.3 mg/Kg to 44.2 mg/Kg for lead. Based on the results of the discrete follow up sampling GEM determined additional excavation of DU2 was not warranted. DEQ agreed with this determination via correspondence between the consultant and project manager.

In January 2025 CHB began a road excavation as they had to have some of the dedicated funding spent or they would lose it. Approximately 3000-4000 yards of soil were removed and placed in stockpiles. GEM collected four (4) soil samples from each approximately 50-yard pile and composited into eleven (11) stockpile samples. Some of this soil may have come from the AOC. Analysis was run on all samples for pesticides and target analyte metals (17 metals). There were some exceedances and the stockpiles with exceedances were disposed at Coffin Butte landfill. The remaining stockpiles exceeding clean fill criteria are still in the process of being removed from the Site and disposed at the Kamph Rock quarry under a solid waste letter of authorization (SWLA).

DEQ requested bills of laden for all the soil leaving the Site regardless of being impacted or not. This was due to the sensitive nature of the project and the multiple funding sources (state, federal).

A 30-day public comment period was opened on October 1, 2025, with a public notice submitted to the Secretary of State (SOS) bulletin, News Register Legal ad and posting on DEQ’s website. Copies of the public notice were sent via hard copy to all the adjacent properties. The public comment period ended on October 31, 2025, with no comments received.

Nature and extent of contamination.
Contaminants of concern on-site include dieldrin, arsenic, and lead. Soil in the AOC was the most impacted media. After removal of the AOC soil and stockpiles there is no unacceptable risk remaining on-site from pesticides or metals based on the residential, construction worker, or excavation worker human health soil ingestion, dermal contact and inhalation RBCss.

Although some metals and DDX were detected in bank soil near Ash Swale, none exceeded ecological soil contact RBCs. Contaminants of concern in Ash Swale sediment include DDX, lead, and mercury which exceed ecological direct contact sediment RBCs. Further discussion is in the ecological risk section.

4. RISK EVALUATION

Conceptual site model.
To evaluate human exposure to residual chemical contamination requires an assessment of the type and extent of that exposure. This is based on current and reasonably likely future site use. DEQ publishes risk-based concentrations (RBCs) for contaminants commonly encountered, for

different types of exposure scenarios. These RBCs are conservative estimates of protective levels of contaminants in soil, groundwater and air. Table 1 shows potential exposure pathways and receptors for this site. Based on this, applicable RBCs are identified and used for risk screening.

Table 1. Identification of applicable RBCs, based on pertinent pathways and receptors

	Pathway	Receptor	Is pathway complete?	Is RBC Exceeded?	Comments
Soil	Ingestion, Dermal Contact, and Inhalation	Residential and/or Urban Residential	Yes	No	Impacted soil was removed in the AOC shallow soil and disposed of at Coffin Butte Landfill.
		Occupational	No	No	
		Construction Worker	Yes	No	
		Excavation Worker	Yes	No	
	Volatilization to Outdoor Air	Residential and/or Urban residential	NA	NA	
		Occupational	NA	NA	
	Leaching to Groundwater	Residential and/or Urban residential	No	NA	Impacted soil was removed in the AOC shallow soil and disposed of at Coffin Butte Landfill. No beneficial water use determined.
		Occupational	NA	NA	
Groundwater	Ingestion & Inhalation from Tap Water	Residential and/or Urban residential	No	NA	Municipal water will be provided to the residences at the Site.
		Occupational	NA	NA	
	Vapor Intrusion into Buildings	Residential	NA	NA	
		Commercial	NA	NA	
	Groundwater in Excavation	Occupational	NA	NA	
Soil Vapor	Vapor Intrusion into Buildings	Residential	NA	NA	
		Commercial	NA	NA	
Ecological	Soil	Non-Threatened & Endangered ground feeding and top consumer birds and mammals, plants and invertebrates	Yes	No	Although some metals and DDX were detected in bank soil, none exceeded ecological soil contact RBCs .
	Sediment	Direct contact with freshwater fish and invertebrates	Yes	Yes	Ash Swale exceeds sediment direct contact eco risk RBCs for DDX, lead, and mercury.

Notes:
NA – not applicable

Contaminant concentrations.
Pesticide impacted soil was removed from 0-6" bgs in the area of concern (AOC) at the Site. Impacted soil from 6"-1' bgs in the AOC did not exceed Human Health Residential RBCs for dieldrin, arsenic, and lead.

Sediment in the swale exceeds direct contact ecological RBCs for DDX, lead, and mercury and is discussed further in the ecological risk section.

Human health risk.
After impacted soil from the AOC was remediated, there is no unacceptable human health risk (soil ingestion, dermal contact and inhalation) for residential receptors, construction workers, or excavation workers.

Ecological risk.
There is currently a total of nine threatened, endangered, or candidate species in the area according to USFWS IPaC report.

Mammals –
- Pacific Marten (*Martes caurina*) – Threatened. There is proposed critical habitat for this species, however the Site location does not overlap the critical habitat.

Birds –
- Marbled Murrelet (*Brachyramphus marmoratus*) - Threatened. There is final critical habitat for this species, however the Site location does not overlap the critical habitat.
- Northern Spotted Owl (*Strix occidentalis caurina*) – Threatened. There is final critical habitat for this species, however the Site location does not overlap the critical habitat.
- Streaked Horned Lark (*Eremophilia alpestris strigata*) – Threatened. There is final critical habitat for this species, however the Site location does not overlap the critical habitat.

Insects –
- Fender's Blue Butterfly (*Icaricia icarioides fenderi*) – Endangered. There is final critical habitat for this species, however the Site location does not overlap the critical habitat.
- Monarch Butterfly – (*Danaus Plexippus*) – Candidate. No critical habitat has been designated for this species.

Flowering Plants-
- Kincaid's Lupine (*Lupinus sulphureus ssp. Kincaidii)* – Threatened. There is final critical habitat for this species, however the Site location does not overlap the critical habitat.
- Nelson's Checker-mallow (*Sidalcea nelsoniana)* - Threatened. No critical habitat has been designated for this species.
- Willamette Daisy (*Erigeron decumbens)* - Endangered. There is final critical habitat for this species, however the Site location does not overlap the critical habitat.

A biodiversity report was provided for species in the area and adjacent Ash Swale. Multiple species were identified in the area with salmon as the only threatened and endangered (T&E) species noted in the Willamette River. DEQ's toxicologist noted that all swale bank soil samples

were below the most sensitive terrestrial ecological RBCs for non-threatened and endangered animals. Ecological sediment RBCs were used to evaluate the protection of aquatic life within the swale itself. Some concentrations of contaminants were above sediment RBCs in the swale.

Table 2 refers to corrections that were made to the leaching to groundwater, ecological most sensitive non-threatened & endangered species, ecological sediment RBC screening level values, and background concentrations in the Data Gaps Evaluation report.

Table 2: Corrections to Screening Level Values - Numbers indicate places where revision or addition is needed. Blank spaces indicate correct values in the Data Gap Evaluation report.

Chemical	RBCss	RBCss(cw)	RBC leaching to Groundwater (mg/kg)[1]	Eco Most Sensitive (MS) Non-T&E	Eco Sed RBC [3]	Eco Sed RBC[3]	Background Concentration
DDD	2,200 ug/kg	9,700 ug/kg	1.1	99 ug/kg (applied to combined DDX)	4 ug/kg	7 ug/kg (applied to combined DDX)	
DDE			1.6		1.5 ug/kg		
DDT			12		4 ug/kg		
Dieldrin			0.010	9 ug/kg	3 ug/kg		
Chlordane		61,000 ug/kg	0.45	1400 ug/kg	4.5 ug/kg		
trans-Nonachlor				1400 ug/kg			
Sb			21				
As			0.09				
Ba			9600				
Be			1200				
Cd			8.4				
Cr			2.4E+09				
Co			16.2				43 mg/kg[4]
Cu			1680				
Pb			30				
Hg			1.98				
Mo			120				2.1 mg/kg[4]
Ni	1,500[2] mg/kg		1560				
Se			31.2				
Ag			48				
Tl			8400				
Va			5160				
Zn	23,000[2] mg/kg		22200				

[1]Leaching to groundwater pathway values are EPA RSLs x 60 to incorporate DEQ's dilution attenuation factor for all except lead, which has its own DEQ RBC.
[2]These are the correct values – transcription error in earlier values recommended by DEQ.
[3]In DEQ's Table 3: Risk Based Concentrations for Sediments; inorganics (including metals) are in units of mg/kg; organics are in units of ug/kg.
[4]Values taken from 95% UPL calculated using USGS data for Oregon from Smith et al 2013, Geochemical and mineralogical data for soils of the conterminous United States: *U.S. Geological Survey Data Series 801* (p. 19). http://pubs.usgs.gov/ds/801/

The ecological evaluation (Table 3) considers 1) the magnitude of sediment RBC exceedances as established through hazard quotients (HQ) and 2) whether there is evidence that the Site has contributed to sediment contamination based on upstream sediment, and co-located bank and soil concentrations on-site. For clarification, although sediment UP and DOWN samples were mislabeled in the Data Gap Evaluation report, up/upstream' and 'down/downstream' in the following paragraphs refers to up and true down based on the swale's flow from south to north.

The upstream sediment sample for the Site was analyzed relative to the mid and downstream samples (i.e. considered as non-site related contribution). Table 3 summarizes the overall ecological sediment findings using the lines of evidence described above. HQ above 1.0 indicates unacceptable ecological risk to the sediment-dwelling animals. Of the pesticides and metals evaluated in swale sediment, DDX (the sum of DDT, DDE, and DDD) and some of the individual compounds (DDT, DDD, and/or DDE) had HQ ranging from 1.0 to 2.1 and at least some evidence of contribution from the Site based on swale bank and upland soil sample concentrations. Additional sampling in the swale to delineate the extent of the contamination is recommended. Additional bank sampling (opposite of the Site) may determine whether additional sources of contamination exist along the swale.

Table 3: Summary Findings of Ecological Evaluation in the Swale - Sediment

Sediment Sample Location	Contaminant	HQ	Detected Upstream?	Concentration in Nearby Banks?	Concentration in Nearby Site Soil?	Conclusion
Middle	DDX (DDE, DDT, DDD)	1.6-2.1 (individual compounds or sum of DDX)	No	Non-Detect or Below Sediment Concentration	Higher than Sediment Concentrations	Some evidence for transport from site into swale, but bank samples are inconsistent with site as the only source.
Down	DDX (DDE, DDT, DDD)	1.0 - 1.7 (individual compounds or sum of DDX)	No in Upstream Sample, Yes in Middle Sample	Some Areas above Sediment Concentrations for DDE and DDX, Others Non-Detect	Higher than Sediment Concentrations	DDX (HQ of 1.0) and DDE (HQ of 1.1) may be transported from Middle area (upstream) and/or could be transported from swale and land on-site. DDD (HQ of 1.7) has the least evidence of transport off-site into the swale (non-detect on bank, low detect on land).
	Lead	1.7	Yes, in Upstream and Middle Samples, both below background	Below Sediment Concentration	Below Sediment Concentration	Unlikely that site is the source of this contamination downstream
	Mercury	7.7	No in Upstream and Middle	Below Sediment Concentration	Below Sediment Concentration	Unlikely that site is the source of this contamination downstream

5. RECOMMENDATION

Additional sediment sampling in the swale to delineate the extent of the contamination is recommended. Additional soil bank sampling (opposite of the Site) may determine whether additional sources of contamination exist along the swale. However, in a memorandum, dated February 20, 2025, DEQ stated that they are not requiring CHB to further assess the swale at this time. The recommendation will be documented in the ECSI 6589 file and in Your DEQ Online (YDO).

Following removal of contamination and based on sample results for soil, acceptable risk levels are not exceeded, and a No Further Action determination is recommended for this Site.

The No Further Action determination should be recorded in DEQ's YDO database (ECSI # 6589.

6. ADMINISTRATIVE RECORD

GEM, Phase I Environmental Site Assessment, Vacant Land, 1204 Oak Street, Amity, Yamhill County, Oregon 97101, GEM Project No. KB081423, August 28, 2023.

GEM, Phase II Environmental Site Assessment, 1204 Oak Street, Amity, Yamhill County, Oregon 97101, GEM Project No. CB092023, November 3, 2023.

GEM, Additional Analysis Addendum, Vacant Land, 1204 Oak Avenue, Amity, Oregon 97101, GEM Project No. CB110623, November 15, 2023.

GEM, Soil Remediation Work Plan & Contaminated Media Management Plan, Amity Oaks Planned Residential Development, 1204 Oak Avenue, Amity, Oregon 97101, GEM Project No. 24-00047, February 6, 2024.

GEM, Data Gaps Evaluation, Amity Oaks Planned Residential Development, 1204 Oak Avenue, Amity, Oregon 97101, GEM Project No. 24-00047, December 17, 2024 (revised June 3, 2025).

DEQ Response to Data Gaps Evaluation, Memo to Community Home Builders, February 20, 2025.

GEM, Dieldrin and Arsenic Contaminated Soil Remediation Work Plan (truncated), Vacant Land, 1204 Oak Avenue, Amity, Oregon 97101, August 29, 2025.

GEM, Dieldrin and Arsenic Contaminated Soil Remediation in DU2 (DU2 Remediation Memo), Vacant Land, 1204 Oak Avenue, Amity, Oregon 97101, October 14, 2025.

Oregon Department of Environmental Quality, Guidance for Evaluating Residual Pesticides on Lands Formerly Used for Agricultural Production, January 2006.

Oregon Department of Environmental Quality, Risk-Based Decision Making for the Remediation of Contaminated Sites, 2003, updated 2023.

7. ATTACHMENTS

1. Figure 3: Site Location map
2. Figure 4: Site Plan map
3. Figure 5: Refined Eco Sediment Data Summary from DEQ Data Gaps Evaluation
4. Figure 6: Amity Oaks DU2 Remediation Area of Concern

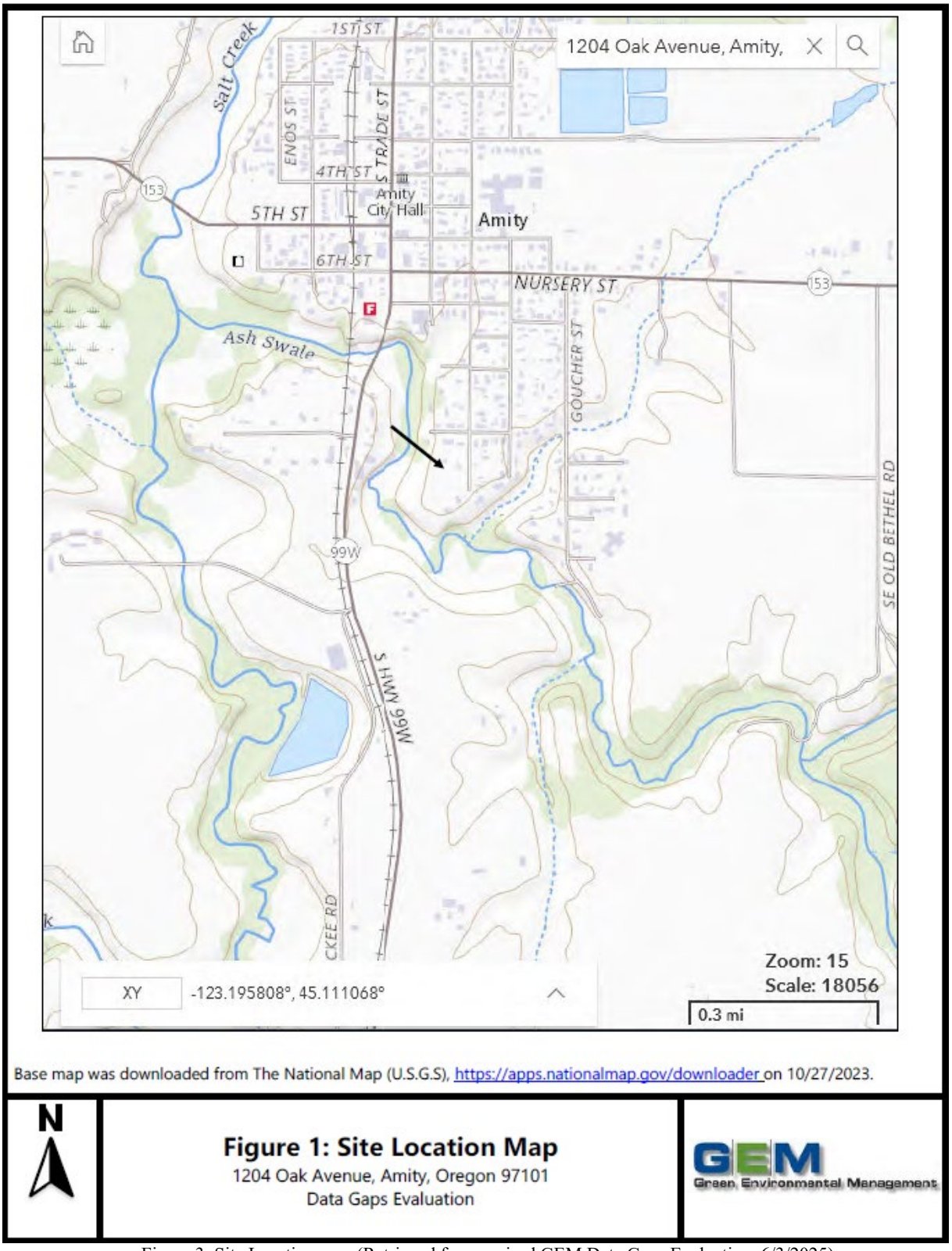


Figure 3: Site Location map (Retrieved from revised GEM Data Gaps Evaluation, 6/3/2025).

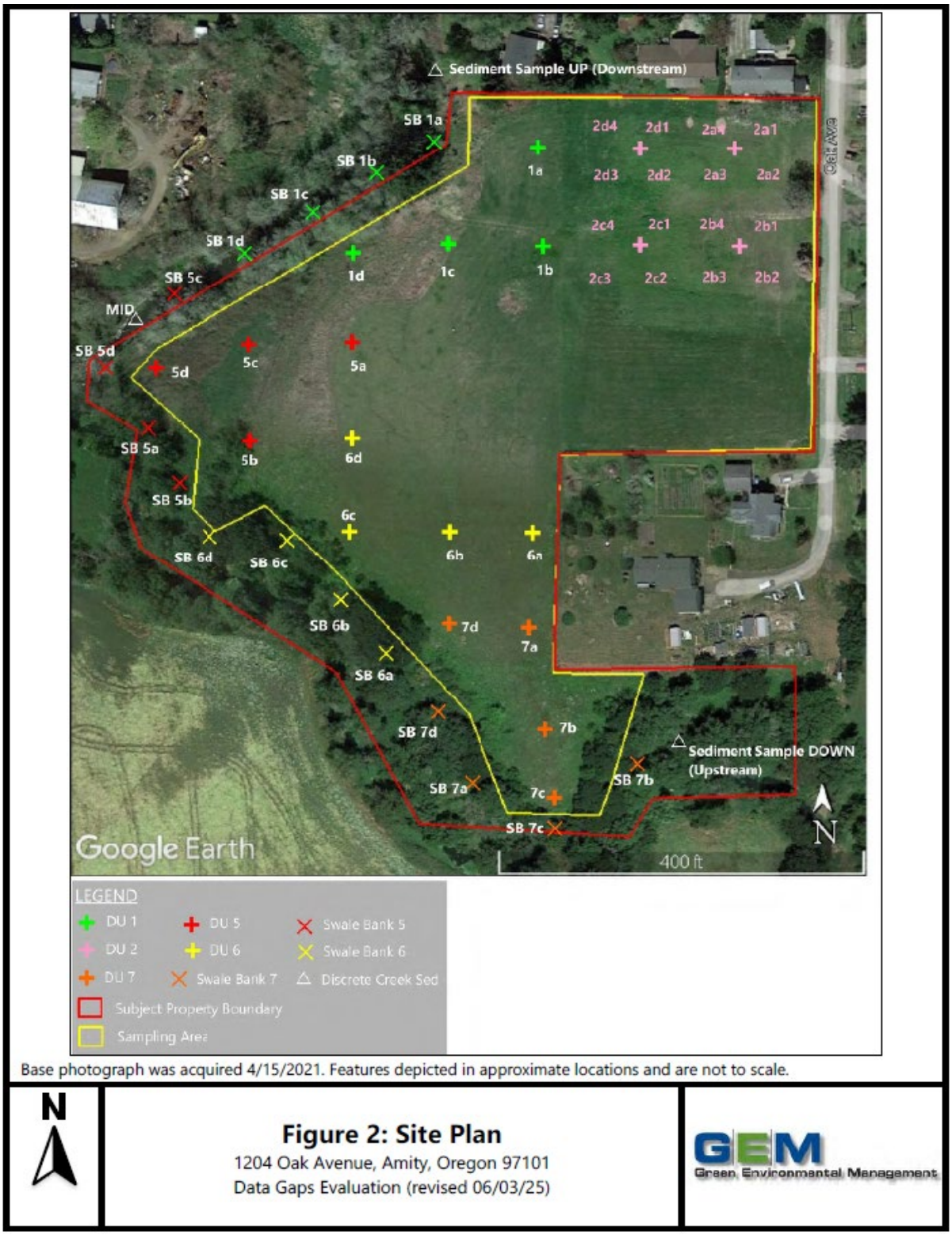


Figure 4: Site Plan (Retrieved from revised GEM Data Gaps Evaluation, 6/3/2025).

Refined Eco Sediment Data Summary from Data Gaps Eval

True Up

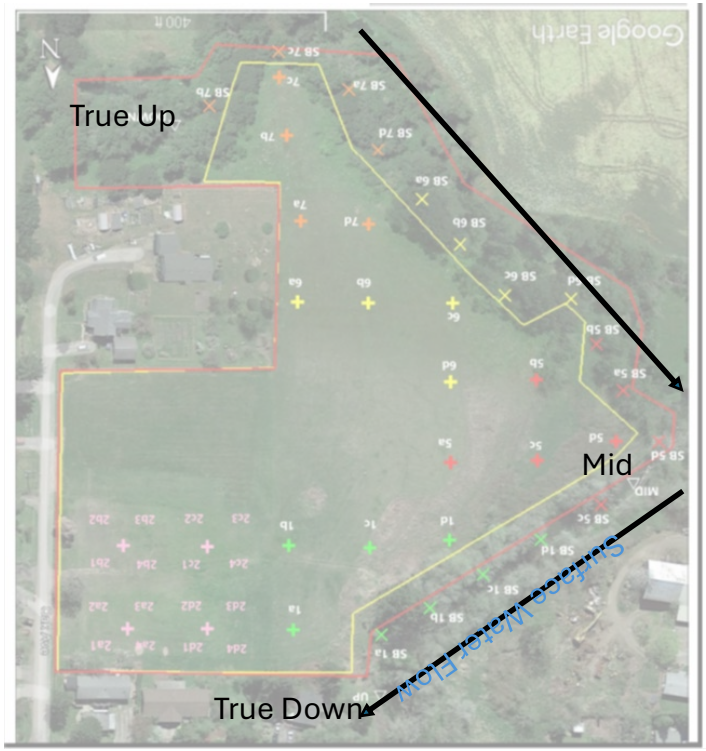
Sed "DOWN" (UP)	HQ (Conc/RBC)	Conc
DDX, DDT, DDE, DDD, Hg	<1	Non-Detect
Pb	<1	15.5 mg/kg
Zn	9.1	1,120 mg/kg

Middle

Sed Mid	HQ (Conc/RBC)	Conc	Swale Upstream Source Concentrations (0-6")	Land Source Concentrations (0 - 6")
DDX	1.6	11.12 ug/kg	Swale: **SB5 - <2.44 ug/kg** **SB6 - <2.35 ug/kg** SB7 – 9.34 ug/kg	Land: **5 (a-d) – 89 ug/kg** **6 (a-d) – 140 ug/kg** 7 (a-d) - <6.7 ug/kg
DDE	1.7	2.55 ug/kg	Swale: **SB5 - <2.44 ug/kg** **SB6 - <2.35 ug/kg** SB7 – 4.24 ug/kg	Land: **5 (a-d) – 52 ug/kg** **6 (a-d) – 140 ug/kg** 7 (a-d) - <6.7 ug/kg
DDT	2.1	8.57 ug/kg	Swale: **SB5 - <2.44 ug/kg** **SB6 - <2.35 ug/kg** SB7 – <2.14 ug/kg	Land: **5 (a-d) – 37 ug/kg** **6 (a-d) - <6.7 ug/kg** 7 (a-d) -<6.7 ug/kg

True Downstream

Sed "UP" (DOWN)	HQ (Conc/RBC)	Conc	Swale Upstream Source Concentrations (0-6")	Land Source Concentrations (0-6")
DDX	1.0	7.01 ug/kg	Swale: **SB 1 - 9.84 ug/kg** **SB5 - <2.44 ug/kg** SB6 - <2.35 ug/kg SB7 – 9.34 ug/kg	Land: **1 (a-d) – 202.3 ug/kg** **5 (a-d) – 89 ug/kg** 6 (a-d) – 140 ug/kg 7 (a-d) - <6.7 ug/kg
DDD	1.7	4.52 ug/kg	Swale: **SB 1 - <2.14 ug/kg** **SB5 - <2.44 ug/kg** SB6 - <2.35 ug/kg SB7 – <2.14 ug/kg	Land: **1 (a-d) – 7.3 ug/kg** **5 (a-d) – <6.7 ug/kg** 6 (a-d) – <6.7 ug/kg 7 (a-d) - <6.7 ug/kg
DDE	1.1	2.49 ug/kg	Swale: **SB 1 - 6.86 ug/kg** **SB5 - <2.44 ug/kg** SB6 - <2.35 ug/kg SB7 – 4.24 ug/kg	Land: **1 (a-d) – 140 ug/kg** **5 (a-d) – 52 ug/kg** 6 (a-d) – 140 ug/kg 7 (a-d) - <6.7 ug/kg
Pb	1.7	58.1 mg/kg	Swale: **SB 1 - 22.8 mg/kg** **SB5 – 12.8 mg/kg** SB6 – 13.3 mg/kg SB7 – 16.3 mg/kg	Land: **1 (a-d) – 16.6 mg/kg** **5 (a-d) – 14.4 mg/kg** 6 (a-d) – 14.1 mg/kg 7 (a-d) - 12.5 mg/kg
Hg	7.7	1.53 mg/kg	Swale: **SB 1 - 0.0635 mg/kg** **SB5 – <0.122 mg/kg** SB6 – <0.118 mg/kg SB7 – <0.0995 mg/kg	Land: **1 (a-d) – 0.152 mg/kg** **5 (a-d) – <0.104 mg/kg** 6 (a-d) – <0.114 mg/kg 7 (a-d) - <0.0950 mg/kg



Bolded swale and land source values indicate those that are assumed to be most relevant to the sediment sampling

Figure 5: Refined Eco Sediment Data Summary from DEQ Data Gaps Evaluation (Memo to Community Home Builders, February 20, 2025).

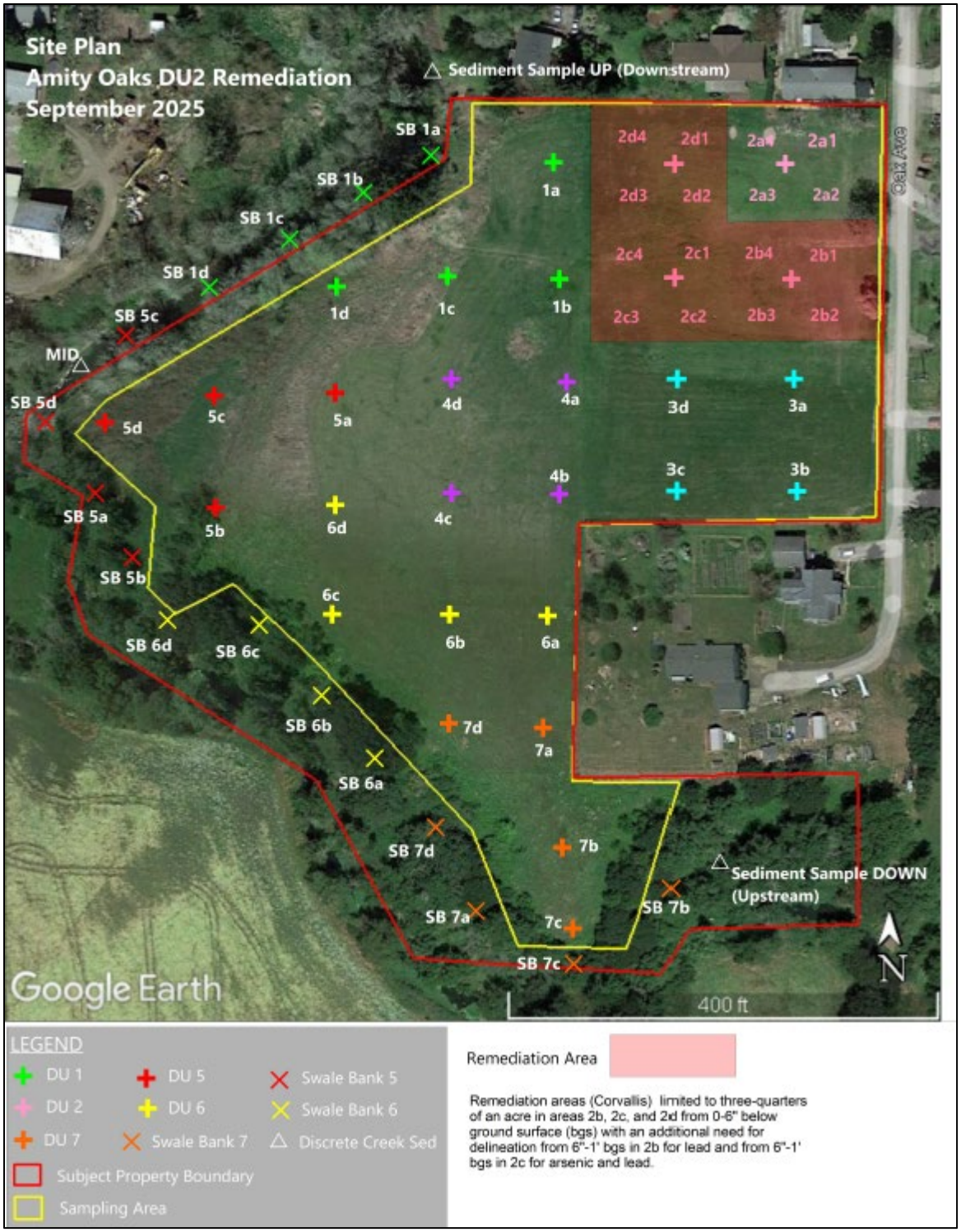


Figure 6: Amity Oaks DU2 Remediation Area of Concern (Retrieved from DU2 Remediation Memo, GEM 11/20/2025).