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Geologic and Environmental Consulting Services



Jim Orr, R.G.
Project Manager, NWR Cleanup Section
Oregon Department of Environmental Quality
Northwest Region
700 NE Multnomah Street, Suite 600
Portland, OR 97232

June 26, 2026

**Subject: Response to DEQ Comment Letter dated March 25, 2026 — Lawrence Oil
August-November 2025 Site Investigation Report
Lawrence Oil Company Bulk Plant
845 N. Columbia River Hwy, St Helens, OR
ECSI #6720**

Dear Mr. Orr,

Martin S. Burck Associates, Inc. (MSBA) has prepared the attached final August-November 2025 Site Investigation Report for the Lawrence Oil Company Bulk Plant in St. Helens, Oregon (ECSI# 6720). The final report incorporates revisions to address the comments provided in your letter dated March 25, 2026.

Your comments and our corresponding responses are provided below.

General Comments

GC-1. OERS Number / ECSI Number

DEQ Comment:

The Oregon Emergency Response (OERS) number listed on the cover is no longer applicable. Please change the cover sheet to reference ECSI# 6720. You should reference the OER's spill number in the release description.

Response:

The cover sheet has been revised to reference ECSI# 6720. The OERS spill number (2024-2684) is now referenced in the release description in Section 2.0.

GC-2. Release Timeline — Potential July 2024 Release

DEQ Comment:

An unknown quantity of off-road diesel was released into the wetland, which was contained with booms and pumped out. Off-road diesel is dyed red to distinguish it from fuel used on state highways. The Google Earth captured image indicates the distribution of red diesel to the west. This photo also indicates the release may have occurred in July 2024, earlier than October 2024, as stated in Section 2. Please revise the release description to reflect this potential release in July 2024.

Response:

The release description in Section 2.0 has been revised to acknowledge the potential for an earlier release in July 2024 based on Google Earth imagery referenced by DEQ. The text now describes the release as potentially occurring as early as July 2024, with the release being reported in late October 2024.

GC-3. Additional Wetland Sampling

DEQ Comment:

Previous cleanup concentrated on the upper 1 to 2 feet of gravel fill above basalt bedrock in the upland release area. The following lines of evidence indicate the need to evaluate additional removal of contamination in the wetland:

- a) The highest sediment concentration was found in Sed 1 with a diesel concentration (NWTPHDx) of 18,300 ppm. Figure 3 shows additional potential seeps in this area. Red diesel is observed in this area in the aerial photo above.*
- b) Elevated concentrations were detected by PID in soil locations WS2, WS3, and WS5.*
- c) Sheen was noted at most locations in wetland bank soils, including WS1 at the westernmost location in the wetland.*

The Revised report should propose additional wetland sampling to evaluate nature and extent of contamination to allow a remediation plan to be proposed.

Response:

A proposal for additional wetland sampling has been included in Section 7.0 of the revised report. The proposed scope includes additional soil, sediment, groundwater, and surface water sampling. The sampling is designed to further delineate the nature and extent of petroleum contamination in the wetland to support development of a remediation plan.

Specific Comments

SC-1a. Metals Analytical Selection (Section 3.1)

DEQ Comment:

Please indicate why only arsenic, chromium, copper, and lead are reported. Please provide an explanation for metals analysis.

Response:

An explanation of the metals analytical selection has been added to Section 3.1. The reported suite (arsenic, chromium, copper, and lead) was established during project coordination with the DEQ in May 2025 and was documented in the DEQ-approved *Wetland Sampling Plan* (July 2025). The suitability of this suite was further verified through supplemental screening of "worst-case" samples for the full RCRA 8 metals list. In correspondence dated April 2, 2026, the DEQ confirmed that this historical justification is sufficient.

SC-2a. Silica Gel Cleanup — Water Samples (Section 3.4.1)

DEQ Comment:

Silica gel cleanup in soil is acceptable as a default given the naturally occurring organic matter. However, natural organic matter is not expected in groundwater. Therefore, groundwater samples should be analyzed without the silica gel. Please indicate if groundwater and surface water samples were completed with or without silica gel.

Response:

The water samples were analyzed without a silica gel cleanup. A clarification has been added to Section 3.4.1 confirming that the water samples were analyzed for diesel/oil without silica gel cleanup.

SC-2b. Gasoline as COI / Red Dye Additives (Section 3.2)

DEQ Comment:

Gasoline should be retained as a contaminant of interest (COI). Additionally, a Safety Data Sheet for red dye additives for diesel fuel should be included. The toxicity of the solvent red dye added to the diesel for identification purposes should be considered. Some additives may show up in the more volatile gasoline range. There may be other releases appearing in this range. Please include potential red dye contaminants in the COI screening.

Response:

Gasoline has been retained as a COI. A Safety Data Sheet for the specific red dye additive utilized at the site (Unisol® Liquid Red BK-50) has been included in Appendix F of the revised report. Review of the SDS indicates the additive is a mixture composed predominantly (60-70%) of petroleum-related hydrocarbons. Therefore, as proposed to DEQ on April 27, 2026, and subsequently approved, the analytical suite will include gasoline-range organics (NWTPH-Gx), diesel-range organics (NWTPH-Dx with and without silica gel cleanup), VOCs (EPA

8260), and PAHs (EPA 8270E SIM). This suite will evaluate both the bulk diesel product and the volatile/semi-volatile petroleum constituents associated with the red dye additive.

SC-3. Table Revisions — RBC Citations

DEQ Comment:

All Tables, Ecological RBCs: Add citations for the source of the Risk-Based Concentrations (RBCs) to tables. Please incorporate comments and revise the Contaminants of Potential Concern (COPCs) screening tables for the different media.

Response:

Source citations have been added to the screening tables, identifying the origin of RBC values. The COPC screening tables have been revised for all media as described in the specific responses below.

SC-3a. Soil Ecological RBCs (Tables 1b, 1c)

DEQ Comment:

Ensure the most current RBCs are used. For example, RBCs are available for all Polynuclear Aromatic Hydrocarbons (PAHs) (“NA” is not applicable). Soil RBCs for ecological exposure scenarios can be found at: <https://www.oregon.gov/deq/Hazards-and-Cleanup/Documents/cleanupTable1a1bEcoRBCs.xlsx>

Response:

Tables 1b and 1c have been revised using the most current DEQ ecological RBCs for soil. PAH entries previously marked “NA” have been populated with the applicable RBC values from the referenced DEQ spreadsheet.

SC-3b. Sediment Ecological RBCs — Unit Correction (Tables 2a, 2b)

DEQ Comment:

i) The sediment tables present the RBCs for PAHs in units of ppm (e.g., Table 2). The correct units for sediment is ppb. Refer to sediment RBCs for ecological exposure scenarios found at: <https://www.oregon.gov/deq/Hazards-and-Cleanup/Documents/ECOimdTable3RBCs.pdf>. Please revise and check all tables to ensure units match analytical results and RBCs.
ii) If an RBC is not present for freshwater sediment, use DEQ’s marine sediment RBC as a surrogate (qualify as surrogate), and Washington DOE SMS Freshwater sediment cleanup objective (SCO) SQVs secondarily. For TPH, the WA DOE SCUM SQV is 340 mg/kg for the NW-Total Petroleum Hydrocarbon Diesel (NW-TPH Dx) result.

Response:

Tables 2a and 2b have been revised. Applicable analytical results and RBC values have been converted to consistent ppb (µg/kg) units for organic compounds.

The unit correction was made and freshwater sediment ecological RBC exceedances at Sed 1 were added, including exceedances for phenanthrene, pyrene, fluorene, naphthalene, acenaphthene, anthracene, and chrysene.

Where no freshwater sediment RBC was available (e.g., 2-methylnaphthalene), the DEQ marine sediment RBC has been used as a surrogate and is qualified accordingly. The WA DOE SCUM SQV of 340 mg/kg (340,000 ppb) for NW-TPH Dx has been added to the sediment tables.

SC-3c. Surface Water Ecological RBCs (Tables 3a, 3b)

DEQ Comment:

Ensure consistency with the surface water RBCs for aquatic life found at: <https://www.oregon.gov/deq/Hazards-and-Cleanup/Documents/cleanupAppWaterSLVs.xlsx>

Response:

Tables 3a and 3b have been reviewed and revised to ensure consistency with the current DEQ surface water RBCs for aquatic life from the referenced spreadsheet. Source citations have been added.

SC-3d. PAH Chemical Class Totals

DEQ Comment:

Calculate total Low Molecular Weight PAHs, total High Molecular Weight PAHs, and Total PAHs to compare to the RBCs. 1- and 2-methylnaphthalenes fall into the LPAH class. For more information, please see: <https://www.oregon.gov/deq/filterdocs/Cleanup-Chemicalclasses.pdf>

Response:

Total LPAH and total HPAH sums have been calculated and added to the screening tables for the applicable media. 1-methylnaphthalene and 2-methylnaphthalene are included in the LPAH class total per the referenced DEQ chemical classes guidance. The PAH class totals are compared to the applicable freshwater sediment ecological RBCs (Total LPAH: 76 ppb; Total HPAH: 193 ppb; Total PAH: 1,610 ppb).

SC-4. Diesel/Oil Sum Calculation

DEQ Comment:

Diesel/oil and NWTPH-Dx results include the sum of diesel and oil range organics. Please correct the Diesel/Oil sum calculation.

Response:

The analytical tables have been revised to include a combined Diesel/Oil (Total Dx) row presenting the sum of diesel-range and oil-range organics for comparison to the applicable NWTPH-Dx cleanup levels. Previously, diesel-range and oil-range results were shown as separate rows without a combined total.

Please contact me at (541) 387-4422 or jowen@msbaenvironmental.com if you have any questions regarding this response or the enclosed final report.

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Owen". The signature is fluid and cursive, with the first name "Josh" and last name "Owen" clearly distinguishable.

Josh Owen
Senior Project Manager
Martin S. Burck Associates, Inc.

Attachments: August-November 2025 Site Investigation Report (Rev 1)

cc: Wesley Thomas, DEQ
Todd Vanek, DEQ
Jenn Peterson, DEQ
Dave Lawrence, Lawrence Oil Company