



Oregon

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September 27, 2005

Mr. Jim Rue
Ross Island Sand and Gravel
P.O. Box 82249
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SUBJECT: revised Feasibility Study (FS)

Dear Jim:

Thank you for providing the revised Feasibility Study (August 2, 2005) for the Ross Island site. The majority of our comments have been addressed. We approve this document, but request an addendum, as described below, to provide additional detail on how the proposed remedial actions meld with the existing Reclamation Plan for the site, and to further clarify remedial action areas as we have discussed with your consultant by phone. In addition we provide several clarifications to the text. The addendum should be submitted to DEQ no later than October 24, 2005 so that it can be available for review prior to end of the public comment period which closes October 31, 2005.

Addendum

1. Additional details on the integration of the proposed capping and stabilization options with the Reclamation Plan should be provided. This should include the basis for the estimated cap volumes, indicating how much of the required cap thickness has already been achieved through existing reclamation fill, how much additional cap thickness will be achieved with planned reclamation fill, and how much material will need to be imported in addition to this to meet the estimated minimum cap thickness of 3 feet. Also, please describe the characteristics and thickness of the material that will be placed on top of the fill to provide aquatic habitat as required by the Reclamation Plan, and whether the material is expected to augment the cap. Cross section and plan view figures illustrating these areas should be developed.

Also, the basis for the reduced volume of cap material required for Alternate 3 for Area D in which hot spot material was removed should be provided.

2. The costs of completing the required capping, including the costs associated with material that will be brought to the area as part of reclamation, should be calculated for each remedial action area where a portion of the cap is provided by reclamation.
3. A revised Figure 6 should be prepared indicating that there are no cleanup areas in the central lagoon.
4. Tables 16 and 17 should be revised to reflect the following:

- a. The incomplete and inaccurate sentence at the end of the comment section for Area E removal options should be deleted (Table 16).
- b. Change "On-Site" to "Off-Site" in identification of Alternative 1 for Area A2 (Table 17).
- c. The description of Alternative 3 for Area D should clarify that the evaluation was made assuming the hot spot material would be taken off-site rather than indicating that the material would be placed either on- or off-site.
- d. Corrected cost estimate (accounting for the total volume of material that will need to be removed) and supporting revised cost table from the Appendix for the removal option for Area F (Table 17).

Clarifications

1. The text in Sections 3 and 4 contains incorrect designations of remedial action areas D, E, and F. The descriptions of these areas provided in Section 5 and illustrated in Figure 6 are correct.
2. Detail beyond that provided in Section 5.1.3 on the grading activities that have taken place in the vicinity of Area A will need to be considered in determining the necessary additional characterization to determine the extent of elevated contaminant levels in this area.
3. Alternative 2 for remedial action area F (CAD cells) should include the addition of fill material to provide slope stability adjacent to the CADs in addition to development of a long-term management/monitoring plan.
4. The long-term monitoring frequency described at the end of Section 6.9 is acceptable; however, it should be noted that some level of long-term monitoring will be required in perpetuity at this site due to the presence of confined highly-contaminated material. This will include implementation of contingency monitoring and possibly cap repair in the event of extreme storm or seismic events.

If you have any questions, please call me at (503) 229-6148.

Sincerely,

Jennifer Sutter, Project Manager
Cleanup and Lower Willamette Section

Cc: Dan Hafley, C&LW/NWR
Jill Kiernan, SR/NWR
Craig Ware, GeoDesign