



State of Oregon Department of Environmental Quality
Response to Comments

Northwest Region
700 NE Multnomah Street, Suite 600
Portland, OR 97232

Summary and Response to Comments to Public Notice for the Proposed Beneficial Use Determination for soil excavated from the Linnton Plywood Association Mill

DEQ issued a public notice on January 17, 2019 requesting public comment on the draft DEQ beneficial use determination for reusing soil excavated from the Linnton Plywood Association Mill. DEQ provided public notice through email and placing the public notice document on DEQ's Public Notices website. The comment period closed at 5 p.m. on February 15, 2019.

DEQ received three written comments during the public notice period. The comments received are provided below, followed by DEQ's response. DEQ has added one additional condition to the beneficial use determination based on these comments.

Comment 1, From: Carol Lane, Engineering Technician II, Portland Water Bureau

"Hello, I think the beneficial use of the soil is a good idea.

Per the notice, it sounds like the soil is well below levels of concern, however, if it is used for utility trenching it would probably be best to avoid using around potable water pipeline."

DEQ response to comment 1:

DEQ agrees with the comment and has added the following condition to the beneficial use approval:
New condition for the beneficial use determination:

"7. The material may not be placed where it will be in contact with or adversely impact groundwater or surface water or be placed in utility trenches for potable water supply lines."

Comment 2, From: Dorothy Shoemaker

"I am commenting on the Proposed Beneficial Use Determination for Soil Excavated from the Linnton Plywood Association Mill permit. The permit is for beneficial use of soil dug up at the old Linnton Plywood Mill. I think this was a PRP in the Portland Harbor Superfund cleanup. I am not sure that this is a good way to get rid of the soil, but it might be OK.

The public notice is at this link:

<https://www.oregon.gov/deq/get-involved/documents/021519linnton.pdf>

The former LPA site is at 10504 NW St. Helens Rd., Portland, Oregon 97231.

The DEQ is proposing to issue a permit to let the soil be used as non-residential construction fill, utility trench fill, and/or road base course. It is too contaminated with PAHs, arsenic, and lead to use in residential construction. It will be important to reuse the fill carefully, as planned. I notice that the permit allows storing the fill for up to 6 months; it would be better to use it immediately.

The Linnton Plywood Association mill in Portland was quite contaminated. I'm glad to see the cleanup worked on. I see that you think neighbors of the place where the soil is reused may be affected, and I hope that this is not the case."

DEQ response to comment 2:

DEQ does not anticipate reuse of the soil in accordance with the beneficial use determination will impact neighboring properties.

Comment 3, From: Mark Pugh, Project Manager, DEQ

I am managing a project on the Columbia Slough. They want to use the Linnton material to build up their site. The Slough has an issue with PCBs. The accepted "background" level for source control purposes is 10 ug/kg. It looks like the Linnton material averages about 24 ug/kg, which I calculated using ½ detection limits for non-detect. The Clean fill criterion is 200 ug/kg. The potential users of this material are negotiating a settlement agreement for the Slough, which requires they demonstrate source control. The site is not a source of PCBs, but potentially could be if this material was used. A similar scenario would be using this material on (another) Portland Harbor site.

I am not suggesting that this BUD not be issued, but wanted to alert you that clean fill criteria may not always be the relevant criteria for certain types of projects. I will advise the owners of my concern using this material, and they can decide whether they want to proceed with using it.

DEQ response to comment 3:

DEQ has added the following condition to the beneficial use determination in response to this comment:

"7. The material may not be placed where it will be in contact with or adversely impact groundwater or surface water or be placed in utility trenches for potable water supply lines."

Alternative formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.