



Oregon

Northwest Region

Kate Brown, Governor

Department of Environmental Quality

700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5263
FAX (503) 229-6945
TTY 711

October 29, 2018

via electronic delivery and US Mail

Mr. Bryan McCampbell
PCC Structural, Inc.
4600 SE Harney Drive
Portland, Oregon 97206-0898

Re: ODEQ Comments – Johnson Creek Sediment Data Report – Large Parts Campus
ECSI #274

Dear Mr. McCampbell,

This letter provides Oregon DEQ's comments on the document entitled "Johnson Creek Sediment Sampling Data Report", prepared for PCC Structural, Inc., by Landau Associates, Inc., dated August 21st, 2018. This document reports analytical data collected during the 2017 sampling event. Please make revisions for a final document consistent with DEQ comments herein.

Section 4.1: The text in this section may have been due to a misunderstanding between DEQ and Landau Associates (Landau). DEQ did not intend for a standard deviation to be compared to a mean concentration (e.g., upgradient levels in DU1). The standard deviation of the mean is useful indicator to assess the amount of variability between replicates within each decision unit (DU), with a greater degree of variability potentially indicative of anthropogenic inputs or sources. However, comparing the standard deviation to measured concentrations in other DU's is not informative. It would be useful to present the mean concentrations and standard deviations in the text or in a separate table. Please revise the text and add a table showing means and standard deviations (where available) in each DU.

Section 4.1.1: Aroclor 1242 was not detected in DU2. Inclusion of error bars on Figure 7 for DU1 and DU3 would be useful to illustrate the likelihood of overlap in concentrations between DU's 1 and 3. Please revise accordingly.

Section 4.1.1: The outfall does not appear to be current source of PCB contamination. The Aroclor 1254 detections in DU3 are consistent with residual (i.e., not ongoing) site source of contamination to Johnson Creek.

Please contact me with questions regarding this letter.

Sincerely,

A handwritten signature in blue ink that reads "Paul Seidel". The signature is written in a cursive, flowing style.

Paul Seidel, Acting NWR Cleanup Section Manager
Northwest Region Cleanup Section

Electronic copies to:

Dana Bayuk, DEQ

Dan Hafley, DEQ

Colette Ganoa, Landau Associates

Paper copy to:

NWR Cleanup files, ECSI #274