

April 16, 2018

Re: White Hawk Site Remediation
718 Beebe Road, Central Point, Jackson County, Oregon

Dear Neighbor:

You are receiving this letter because you live within 1/4 mile of the proposed White Hawk Development (the site). Prior to development, Oregon Department of Environmental Quality (DEQ) is requiring remediation of soil that contains arsenic from past site uses as an apple orchard. The work is being performed by the current property owner (Peoples Bank of Commerce). This letter is to notify you of the planned remediation and provides a description of the work to be done.

PROJECT BACKGROUND

Several investigations were carried out at the site in 2005, 2006, and 2016. Lead arsenate was formerly used at most orchards in the region as a pesticide, and it appears to have been used at the fruit orchard that was previously present in the northeast corner of the site. As a result, arsenic and lead were found at levels higher than the regional background levels in soils. A cleanup plan was developed for the site under the guidance of the DEQ.

Results of groundwater sampling show that the arsenic and lead in the shallow soil at the site have not and will not impact groundwater.

SOIL REMEDIATION

The remedy for the site requires capping soil that has arsenic above background levels and then conducting long-term cap maintenance. The remedy focuses on arsenic because the lead concentrations both within and outside of the former orchard area are below DEQ risk-based cleanup levels (RBCs). The proposed development of the site includes a recreational park in the former orchard area and residential properties surrounding the park. The park area is referred to as Area A or the Soil Management Area in the soil remediation plan¹. The park (Area A) will be capped with either 2 feet of imported soil in landscaped areas, or by asphalt or concrete pavement in hardscape areas. Specifically, the soil remediation includes:

- Preparing an Erosion Control Plan and Site Grading Plan prior to the initiation of any site remediation activities that will layout the required techniques to be used by the construction crew to mitigate dust and minimize erosion. The Site Grading Plan will also include the construction specifications of the cap for Area A.
- Excavating soil from two areas outside of Area A that have arsenic concentrations above background and placing this soil in Area A.
- Collecting soil samples from areas not previously sampled to confirm that the remaining soil has arsenic at background levels.
- Placing a demarcation fabric over the soil surface in Area A to allow easy delineation between native and cap materials. In this way, if excavation is performed in this area in the future - after the cap has been constructed - it will be clear what soil is the clean cap material and what soil may contain arsenic above background.

¹ Titled the Revised Soil Management Plan.

- Constructing the cap as specified in the Site Grading Plan and consistent with the soil remediation plan.

Once the soil excavation identified above is complete, Area A will contain the soil at the site that has arsenic concentrations above background levels and will be the Soil Management Area. Long-term maintenance of the Soil Management Area is required and includes:

- Visual inspection of the cap annually; the cap shall be inspected for evidence of wear that could lead to a breach of the cap.
- Preparing a cap inspection report documenting the inspection, the performance of any required maintenance, and overall quality of the cap, and submitting this inspection report to the DEQ annually.

Soil outside the Soil Management Area will no longer contain average arsenic concentrations above background levels and therefore will not need to have long term management.

DEQ OVERSIGHT

The DEQ provided oversight of the investigation and development of the remedial action plan under its Voluntary Cleanup Program. DEQ reviewed and approved of the soil remediation plan, titled the Revised Soil Management Plan, following a public comment period to allow for public input on the plan. The DEQ then prepared a Staff Report summarizing the key elements of the project and mitigation plan.

SCHEDULE FOR SOIL MITIGATION

Soil excavation and capping is planned for spring 2018.

RESOURCES AND ADDITIONAL INFORMATION

Additional detail on the investigation and proposed cleanup can be found in the following documents:

1. *Independent Cleanup Program Report*, 718 Beebe Road, Apex (Apex, June 13, 2016)
2. *Revised Soil Management Plan 718 Beebe Road, Apex* (Cascadia Associates; June, 2017)
3. *Oregon DEQ Staff Memorandum in support of a Conditional No Further Action determination (DEQ, May 25, 2017)*

Hard copies of these documents are maintained at the Central Point branch of the Peoples’ Bank of Commerce located at 1017 E. Pine Street, Central Point, Oregon 97502.

CONTACT SOURCES:

Peoples Bank of Commerce: Ken Trautman 1311 E. Barnett Rd., Medford, Oregon 97504 541.774.7654	City of Central Point: Stephanie Holtey 140 S 3rd Street, Central Point, Oregon 97502 541.423.1031
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A **public meeting** has been **tentatively** scheduled for **May 2, 2018 at 6pm at Shepherd of the Valley Catholic Church (600Beebe Road, Central Point, OR 97502)**. **If you are interested in attending this public meeting for more information or to provide comments on the soil remediation plan, please contact Ken Trautman at the contact information above within 14 days of this notice.** The meeting will be held if 10 or more people have stated that they will attend.