Final Decision Document

Multiple Sites at Former Camp Adair
Adair Village, Benton County, Oregon

DERP-FUDS Project No. F10OR002904

U.S. ARMY CORPS OF ENGINEERS
KANSAS CITY DISTRICT
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Acronyms and Abbreviations

AOPC	Area of Potential Concern
ASR	Archives Search Report
BC	Boise-Cascade
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
DD	decision document
DERP	Defense Environmental Restoration Program
DoD	United States Department of Defense
EEWWA	E.E. Wilson Wildlife Area
FUDS	Formerly Used Defense Sites
mg/kg	milligrams per kilogram
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
ODEQ	Oregon Department of Environmental Quality
PA	Preliminary Assessment
PAH	polycyclic aromatic hydrocarbon
PCB	polychlorinated biphenyl
ppm	parts per million
RI	Remedial Investigation
SAGE	Semi-Automatic Ground Environment
SI	Site Inspection
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
UST	underground storage tank
VOC	volatile organic compound

Section 1 **Declaration**

This Decision Document (DD) presents the No Action decision for all Areas of Potential Concern (AOPCs), except one, at the former Camp Adair Cantonment Area (former Camp Adair) located in Adair Village, Oregon. The former Camp Adair Project is being conducted as part of the Formerly Used Defense Sites (FUDS) program (United States Army Corps of Engineers [USACE] 2004). "Area of Potential Concern" (AOPC) is a term used for an area that had sufficient activity to warrant a focused study, including collection of appropriate samples and assessment of risks to humans and the environment. The use of AOPCs is made to manage investigations and cleanup decisions efficiently.

The one AOPC where the No Action decision is not considered is the privately owned facility AOPC 5A. Since a right of entry was not granted by the owner, investigation of the AOPC could not be completed. Because no investigation was completed, there was no assessment regarding risk to human health and the environment, and no cleanup decision could be made. As a result, the main building within the AOPC 5 boundary (AOPC 5A) has been placed in an interim risk management phase until such time as a right of entry can be acquired.

1.1 Site Name and Location

- Site Name: Former Camp Adair Cantonment Area
- Site Location: Adair Village, Benton County, Oregon
- FUDS Property/Project Number: F10OR0029

The Project area addressed in this DD comprises the following AOPCs:

- AOPC 1 – Bomarc Missile Site
- AOPC 2 – Coal Storage Yard
- AOPC 3 – Sewage Treatment Plant, Incinerators, and Wash Rack
- AOPC 4 – Morgue
- AOPC 5 – Semi-Automatic Ground Environment (SAGE) Facility
  - AOPC 5B – SAGE Facility Generator Tank Site
  - AOPC 5C – 3rd Street and Vandenberg Avenue
  - AOPC 5D – Oil/Water Separator
- AOPC 6 – Salvage Yard
- AOPC 7 – Shops
  - AOPC 7A – Cantonment Utility Shops
  - AOPC 7B – Ordnance Repair Shop
  - AOPC 7C – Hospital Shops
  - AOPC 7D – Installation Engineer Shops
- AOPC 8 – Vehicle Fueling Areas

  - AOPCs 8A-1 to 8A-7 – Cantonment Vehicle Fueling Areas
  - AOPC 8B-1 – Adair AFS General Fueling Facility
  - AOPC 8B-2 – Adair AFS Vehicle Maintenance Building Vehicle Fueling
- AOPC 9 – Vehicle Maintenance Areas
  - AOPCs 9A-1 to 9A-13 – Camp Adair Cantonment Vehicle Maintenance Areas
  - AOPC 9B-1 – Adair Army Hospital Vehicle Maintenance Area
  - AOPC 9C – Air Force Auto Maintenance Facility
- AOPC 10 – Adair AFS Sewage Treatment Plant
- AOPC 11 – Boiler Houses *
  - AOPC 11A – Boiler House
  - AOPC 11B – Boiler House
  - AOPC 11C – Boiler House
- AOPC 12 – Electrical Substations
  - AOPC 12A – Electrical Substation
  - AOPC 12B – Electrical Substation
- AOPC 13 – Landfill
- AOPC 14 – Laundry Facility and Steam Plant
- AOPC 15 – Non-Military Industrial Process Areas

(*) Previous documents referred to the boiler houses collectively as AOPC 11. This DD identifies the boiler houses separately as AOPC 11A, 11B, and 11C.)

The Project area, located 9 miles north of Corvallis, Oregon, lies within the former Camp Adair Cantonment area, and covers approximately 57,000 acres (**Figure 1**). The Department of Defense (DoD) used the area from 1942 until 1970, after which the property was transferred to new owners that included federal, state, and local agencies, as well as industrial, commercial, educational, and agricultural operations.

1.2 Statement of Basis and Purpose

This DD presents a No Action decision for the AOPCs listed above. Investigation and cleanup decision activities at the site were conducted with the authorities of the Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS) within the USACE program for response actions addressing hazardous, toxic, and radioactive waste releases. These programs follow requirements and regulations of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision is based on the Administrative Record file for the Project. The stakeholders that have participated in the investigations and decision process are the USACE and the Oregon Department of Environmental Quality (ODEQ), and each concurs with the decision for No Action for the listed AOPCs at the former Camp Adair.

1.3 Description of the Selected Remedy

The USACE has determined that no unacceptable risks or ecological effects exist related to past DoD activities, and no remedial action is necessary to ensure protection of human health and the environment.

The results of the investigation and risk assessment activities and the current and future site uses for the areas discussed in this DD show that cleanup is not needed because the DoD-related contamination does not pose an unacceptable risk to human health or the environment. This was determined through completion of human health and ecological risk assessments that considered current and potential future land use.

1.4 Statutory Determinations

No remedial action is necessary to ensure protection of human health and the environment at the former Camp Adair because the risk assessments concluded that past DoD activities at the AOPCs covered under this DD did not result in unacceptable risks. Therefore, the CERCLA Section 121 statutory determinations (e.g., requirements to conduct a five-year review) are not required because no remedy is being selected.

1.5 Authorizing Signatures

The USACE Northwestern Division denotes acceptance of this DD as the final response action for the selected AOPCs addressed in this DD by signing the authorizing signature page at the end of this section. This DD will be part of the Administrative Record and available for public viewing at the public information repository at the Independence Public Library located at 175 Monmouth Street, Independence, Oregon.

FINAL DECISION DOCUMENT

FORMER CAMP ADAIR CANTONMENT AREA
ADAIR VILLAGE, BENTON COUNTY, OREGON

APPROVAL

This Decision Document (DD) presents the selected decision for the 45 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Areas of Potential Concern (AOPCs) at the Formerly Used Defense Site (FUDS) known as the former Camp Adair Cantonment Area, Adair Village, Oregon.

The Project area addressed in this DD comprises the following AOPCs:

- AOPC 1 – Bomarc Missile Site
- AOPC 2 – Coal Storage Yard
- AOPC 3 – Sewage Treatment Plant, Incinerators, and Wash Rack
- AOPC 4 – Morgue
- AOPC 5 – SAGE Facility
  - AOPC 5B – SAGE Facility Generator Tank Site
  - AOPC 5C – 3rd Street and Vandenberg Avenue
  - AOPC 5D – Oil/Water Separator
- AOPC 6 – Salvage Yard
- AOPC 7 – Shops
  - AOPC 7A – Cantonment Utility Shops
  - AOPC 7B – Ordnance Repair Shop
  - AOPC 7C – Hospital Shops
  - AOPC 7D – Installation Engineer Shops
- AOPC 8 – Vehicle Fueling Areas
  - AOPCs 8A-1 to 8A-7 – Cantonment Vehicle Fueling Areas
  - AOPC 8B-1 – Adair AFS General Fueling Facility
  - AOPC 8B-2 – Adair AFS Vehicle Maintenance Building Vehicle Fueling
- AOPC 9 – Vehicle Maintenance Areas
  - AOPCs 9A-1 to 9A-13 – Camp Adair Cantonment Vehicle Maintenance Areas
  - AOPC 9B-1 – Adair Army Hospital Vehicle Maintenance Area
  - AOPC 9C –Air Force Auto Maintenance Facility
- AOPC 10 – Adair AFS Sewage Treatment Plant
- AOPC 11 – Boiler Houses *
  - AOPC 11A – Boiler House
  - AOPC 11B – Boiler House
  - AOPC 11C – Boiler House
- AOPC 12 – Electrical Substations
  - AOPC 12A – Electrical Substation
  - AOPC 12B – Electrical Substation
- AOPC 13 – Landfill
- AOPC 14 – Laundry Facility and Steam Plant
- AOPC 15 – Non-Military Industrial Process Areas

(*) Previous documents referred to the boiler houses collectively as AOPC 11. This DD identifies the boiler houses separately as AOPC 11A, 11B, and 11C.)

Under the Defense Environmental Restoration Program (DERP), The United States Army Corps of Engineers (USACE) is the lead FUDS agency and executes environmental cleanup on eligible properties that were formerly owned, leased to, or otherwise possessed by the Department of Defense. As required by DERP statute [10 USC 2701 (a)(2)], this DD has been developed in accordance with the CERCLA, as amended by the Superfund Amendments and Reauthorization Act, and the National Oil and Hazardous Substances Pollution Contingency Plan. This DD, presenting the No Action decision, is approved by the undersigned, pursuant to Memorandum, CENWD-ZA, December 19, 2017, Subject: Re-delegation of Assignment of Mission Execution Functions Associated with Department of Defense Lead Agent Responsibilities for the Formerly Used Defense Sites Program, and Engineer Regulation 200-3-1, FUDS Program Policy.

APPROVED:

David J. Ponganis, SES
Director, Programs
Northwestern Division

13 AUG 2018
Date

Section 2 **Decision Summary**

The Decision Summary identifies that no remedy is being selected, explains why no remedial action is necessary to ensure protection of human health and the environment, and provides a substantive summary of the Administrative Record file that supports the no action decision.

2.1 Site Name, Location, and Brief Description

Site Name:	Former Camp Adair Cantonment Area
Location:	Adair Village, Benton County, Oregon
Lead Agency:	U.S. Army Corps of Engineers
State Support Agency:	Oregon Department of Environmental Quality
Site Type:	Formerly Used Defense Site
Funding Source:	Funding for remedial activities is provided by the Defense Environmental Restoration Account, a funding source approved by Congress to clean up contaminated sites on DoD installations.
Site Description:	The former Camp Adair is located approximately 9 miles north of Corvallis, Oregon and comprises 56,815.17 acres. The Project Area consists of 46 AOPCs, of which the DD addresses 45 AOPCs. **Figure 2** shows the AOPCs addressed by this DD.

2.2 Site History

In 1941, the War Department selected the site for Camp Adair north of Corvallis, Oregon, centered around the small community of Wells, Oregon, in the Willamette Valley. The 56,815.17 acres for the site were acquired in fee between 1942 and 1945. The homes, farms, and cemeteries that made up the community of Wells were relocated in 1942 to allow for Camp Adair to be constructed. Built in six months, Camp Adair was 6 miles wide and 10 miles long, and contained over 1,700 buildings including barracks, machine shops, stores, kitchens, theaters, hospitals, and chapels.

Four Infantry Divisions trained at Camp Adair from 1942 to 1944. The Army began to reduce its operation in the area and transferred the hospital to the Navy in 1944. Camp Adair also served as a prisoner of war camp until 1946 when the Army declared Camp Adair as surplus and it was assigned for disposition. The land surrounding the cantonment was returned to its original farming use, and in 1950, approximately 1,700 acres of the cantonment area was established as the Oregon Department of Fish and Wildlife E.E. Wilson Wildlife Area (EEWWA).

The Air Force also used Camp Adair between 1958 and 1969 for a SAGE support facility and started, but never completed, construction of a Bomarc launch facility. In 1970, the remaining lands were transferred to various federal, state, and local governmental agencies; educational organizations; and private companies and individuals.

2.3 Community Participation

The Proposed Plan for the former Camp Adair Project was made available to the public on November 6, 2017 as part of the Administrative Record file. Copies of the Administrative Record file reside at the USACE Kansas City District office and in the information repository at the Independence Public Library. Selected documents are available online for review at: http://www.nwk.usace.army.mil/Missions/Environmental/Environmental-Projects/Camp-Adair. The notice of the availability of the Proposed Plan and the date of the public meeting were first published in the November 1, 2017 editions of the *Albany Democrat Herald* and the *Corvallis Gazette-Times*. A public comment period was held from November 6 through December 13, 2017, and a public meeting was held on November 15, 2017 at the Adair Village City Hall to present the proposed plan. The public was encouraged to participate in the decision-making process by providing comments on the Proposed Plan and attending the public meeting; representatives from the USACE and ODEQ were present at the meeting. No public comments were received.

2.4 Site Characteristics

This section summarizes the physical characteristics of the Project area, including the nature and extent of chemicals.

2.4.1 Geology and Hydrogeology

The alluvial deposits at the Camp Adair site are composed of silt and pebbly sands containing occasional lenses of gravel. Bedrock materials of the region underlie the alluvial deposits. Based on soil borings performed for site investigations, depth to bedrock at Camp Adair is approximately 26 to 27 feet below ground surface (bgs). Underlying soils at the site consist of well-drained silty to sandy clay with varying amounts of fine to medium-grained gravel.

The former Camp Adair site is a part of the Middle Willamette Agricultural Water Quality Management Area. Groundwater quantity and yield throughout the middle Willamette Valley is typically low due to the shallow thickness and fine-grained nature of soils that overlie the bedrock basalts and indurated sedimentary rock. The primary method of groundwater recharge is precipitation, which averages 42.7 inches annually, with late autumn through early spring being the primary period of aquifer recharge. Geologic information provided by drilling contractors estimated groundwater typically occurs at depths between 10 and 20 feet bgs. Records show that historical attempts to place deep wells at the cantonment area of former Camp Adair were unsuccessful, apparently due to extensive clay and silty soils beneath the site.

2.4.2 Surface Water

Soap Creek, part of the Luckiamute River drainage, is the main water body responsible for surface water drainage at the former Camp Adair site. Surface water flow from the site eventually drains into the Willamette River via Soap Creek. The Willamette River flows north into the Columbia River in Portland, Oregon, where flow continues a short distance west to the Pacific Ocean.

2.4.3 Ecological Setting

Native vegetation at former Camp Adair primarily consists of grass and widely spaced Oregon white oak, Douglas fir, wild rose, poison oak, snowberry, and bracken fern; as well as an abundance of invasive species such as Himalayan blackberry, Scotch broom, teasel, thistles, and a variety of nonnative grasses and naturalized flower species. Open wet meadows are present in the area, and are interspersed with wetlands, ponds, and natural and man-made channels. Roads and facility footprints are widespread throughout the former Camp Adair cantonment area, resulting in an extensive network of disturbances. Although threatened and endangered species are suspected to occur in the general vicinity of the former Camp Adair site, no Endangered Species Act designated critical habitat is within the cantonment area.

2.5 Previous Investigations

The USACE began oversight in 1990 under the purview of DERP-FUDS (DoD 2012). The AOPCs were subject to a series of investigations leading to the Remedial Investigation (RI) Report (USACE 2017). The initial studies were used to determine sampling locations, media, and chemicals of interest for the RI phase. Data collected during the RI focused on specific areas related to the potential release of contamination from past DoD use. The RI evaluated potential threats to human health and the environment and the report conclusions are the basis for the No Action decision presented in this DD.

The investigations and studies followed the CERCLA phases represented by the documents and investigations listed below.

- Archives Search Report (USACE 2002)
- Preliminary Assessment (USACE 2007)
- Site Inspection (USACE 2012)
- Technical Memorandum: Background Desktop Exercise (USACE 2014)
- Technical Memorandum: AOPC Status Update (USACE 2015)
- Remedial Investigation (USACE 2017)

2.5.1 2002 Archives Search Report

USACE St. Louis District completed the Archives Search Report (ASR) to compile information obtained through historical research at various archives and records holding facilities, interviews with persons associated with Camp Adair, and an inspection of the former Camp Adair. The archive search uncovered evidence that the Army and the Air Force stored and utilized conventional ordnance at the former Camp Adair for training purposes and that the Army stored and utilized Chemical Warfare Material at Camp Adair for training purposes. The archive search did not reveal any additional areas of potential environmental concern associated with the military use of the former Camp Adair.

2.5.2 2007 Preliminary Assessment

Following the ASR, the USACE Seattle District performed the Preliminary Assessment (PA) to summarize existing information, identify environmental concerns and data gaps, and indicate where elements of the state close out requirements had been addressed. The PA also developed and presented the conceptual site model for the former Camp Adair.

2.5.3 2012 Site Inspection

The Site Inspection (SI) was conducted based on the recommendations of the PA, as well as ODEQ response to the PA recommendations. Twenty seven AOPCs were investigated in the SI. The SI included, as a first step, a site reconnaissance. If the reconnaissance indicated that additional investigation activities were necessary at a respective AOPC, then soil sampling was conducted as a second step. Collection of background soil samples was also conducted during the SI.

2.5.4 2014 Background Desktop Exercise Technical Memorandum

Following completion of the SI Report, ODEQ published revised data tables specifying new regional default background concentrations of various metals in Oregon soils. In the Background Desktop Exercise Technical Memorandum, USACE re-evaluated AOPC metals concentrations compared to these new background values to identify whether additional metals or entire AOPCs should be removed from further consideration. The Background Desktop Exercise Technical Memorandum also provided recommendations for additional site-specific background samples to evaluate whether observed metals concentrations at the AOPCs represented contamination above background levels or were indicative of typical background conditions.

2.5.5 2015 AOPC Status Update Technical Memorandum

The AOPC Status Update Technical Memorandum was prepared by USACE Seattle District to provide an update on all of the AOPCs identified during the PA, to recommend further investigation (as appropriate) on the basis of any new information, and to support subsequent development of the RI.

2.5.6 2017 Remedial Investigation

Based on the recommendations presented in the SI and the two technical memoranda described above, a RI was conducted, which included additional soil sampling at some AOPCs (2, 9A-6, 9A-8, 9A-12, 9A-13, 9C, 12A, 12B, and 14). The RI included baseline human health and ecological risk assessments to determine whether existing contamination at the impacted sites posed a threat to human and/or ecological receptors. Risk management decisions for the AOPCs covered by this DD are based on site history and (when applicable) comparison of sample results to the background, chemical, and risk-based regulatory criteria identified in the RI. These criteria included background criteria from ODEQ and other federal regulatory agencies. The risk-based comparison criteria for the project were identified and applied in the RI through collaboration between ODEQ and USACE.

2.6 Nature and Extent of Contamination

This section summarizes the nature and extent of chemicals detected in media at selected AOPCs based upon data collected in the 2012 SI and the 2017 RI. The USACE's investigations, including results from the baseline risk assessments, showed that past chemical releases in the AOPCs addressed by this DD did not leave significant levels or areas of contamination. To make risk-based decisions for the AOPCs, the USACE compared results for the soil samples collected during the SI and the RI against conservative (that is, health protective) screening levels from U.S. Environmental Protection Agency (USEPA) and ODEQ, and against other risk-based criteria as developed and presented in the RI. The screening process helped focus the risk assessments on chemicals that might pose a risk to human health or ecological receptors and was conducted to limit the number of contaminants included in quantitative risk assessment while also assuring that all significant contaminants were addressed. The screening process used conservative methods such that a chemical that may have very limited potential to pose any risk or hazard to human health or ecological receptors was included, rather than potentially excluding a chemical that might pose such risks or hazards. Thus, while finding a chemical at a concentration above a screening level indicates a need for further evaluation, it does not indicate that cleanup is required. The need for cleanup depends on factors such as site use and other considerations.

2.6.1 AOPC 1

AOPC 1 was investigated during the SI, including the collection of soil samples. The SI Report recommended AOPC 1 for no action for all analytes, based on no detections of analytes in the samples collected.

2.6.2 AOPC 2

During the SI, copper was detected at concentrations exceeding the existing local background value. Based on the SI, additional soil samples were collected in the RI and analyzed for copper. During the RI, the maximum detected concentration of copper was less than the lowest applicable human health risk screening criteria, therefore no human health risk assessment was considered necessary for this AOPC.

Results from RI sampling revealed that soils collected from AOPC 2 exceeded ecological screening criteria for copper. However, it was determined that a baseline ecological risk assessment was not required due to the lack of complete exposure pathways given the presence of the impervious and semi-impervious surfaces across AOPC 2 and lack of significant habitat. The presence of compacted surface layers and the anticipated future land use for the site for redevelopment also limit the habitat value for future ecological receptors. Based on the SI and RI recommendations, no further action was required at AOPC 2.

2.6.3 AOPC 3

AOPC 3 was investigated during the SI, including the collection of soil samples. The SI Report recommended AOPC 3 for no action for all analytes, based on no detections above local background of analytes in the samples collected.

2.6.4 AOPC 4

Site reconnaissance was conducted at AOPC 4 during the SI. The SI Report recommended AOPC 4 for no action for all analytes since the site reconnaissance did not identify any criteria that would warrant sampling such as a drain not connected to sanitary sewer, stressed vegetation, or site features such as spoil piles or other debris.

2.6.5 AOPC 5B

In 1994, the tanks and above-ground piping at AOPC 5B were removed, along with approximately 1,200 cubic yards of contaminated soils (Underground Storage Tank Decommissioning Report, Volume I, 1995). Contaminated soils were also discovered at a storm sewer line adjacent to the southern edge of the excavation. Portions of the storm sewer line found to contain diesel contamination were replaced. Confirmation soil samples were collected from the excavation floor and sidewalls and from the storm sewer excavation trench. All confirmation samples were non-detect for contaminants except for select metals that were determined to not be in excess of background levels. In addition, potential for groundwater contamination was considered low since the water table was not encountered during underground storage tank (UST) removal and soil confirmation samples were non-detect or below screening levels. Based on the 1995 USTs decommission report results and recommendation along with the additional analysis provided by the PA and SI reports, no further action is required for AOPC 5B.

2.6.6 AOPC 5C

A review of possible sources of contamination in the vicinity of AOPC 5C concluded that the SAGE Facility Tank Site was not a contributor. USACE recommended AOPC 5C for no action in the April 2015 Technical Memorandum, based on unlikely contribution from past DoD activities.

2.6.7 AOPC 5D

During excavation and decommissioning activities at AOPC 5B, the oil-water separator at AOPC 5D was discovered and subsequently removed, but associated underground piping was not removed. During the SI, soil samples were collected beneath the two identified piping runs and below the suspected location of the former piping. Barium, copper, nickel, and zinc were the only analytes detected in the soil samples above local background values and project screening levels. Zinc concentrations were less than the Oregon regional background levels. The results for petroleum hydrocarbons were all below the screening levels. Subsequently, the previously identified metals were re-assessed and AOPC 5D was recommended for no action based on the findings of the Background Desktop Exercise Technical Memorandum and the AOPC Status Update Technical Memorandum.

2.6.8 AOPC 6

Site reconnaissance was conducted at AOPC 6 during the SI. The SI Report recommended AOPC 6 for no action for all analytes since the site reconnaissance did not identify any criteria that would warrant sampling such as a drain not connected to sanitary sewer, stressed vegetation, or site features such as spoil piles or other debris.

2.6.9 AOPC 7

Site reconnaissance was conducted at the four shops areas (AOPCs 7A, 7B, 7C, and 7D) during the SI. The SI Report recommended AOPC 7 for no action for all areas since the site reconnaissance did not identify any criteria that would warrant sampling such as a drain not connected to sanitary sewer, stressed vegetation, or site features such as spoil piles or other debris.

2.6.10 AOPC 8A-1 through 8A-6

All USTs were removed from AOPCs 8A-1 through 8A-6 by parties other than the DoD sometime in the 1970s. Sampling conducted in 1995 found no contamination. However, no sampling was done in the former tank pits or along the distribution piping. During the SI, soil samples in these areas were collected, and no contamination was found above local background values. Based on the SI, no further action was required at AOPC 8A-1 through 8A-6.

2.6.11 AOPC 8A-7

AOPC 8A-7 is located on lands formerly owned by Boise-Cascade (BC) that were transferred to the City of Adair Village. AOPC 8A-7 was sampled during PAs performed by BC in 1990. The investigation showed contamination in tank pits, and excavation was performed to remove petroleum contaminated soil. In March 1991, ODEQ stated that the soil removal activities were complete, and no further action was required at AOPC 8A-7.

2.6.12 AOPC 8B-1

AOPC 8B-1 consists of a former fuel station which was used for fuel dispensing, oil changing, and light repair. The site contained former USTs (two gasoline, one waste oil, and one heating oil). The gasoline and waste oil USTs were decommissioned by USACE in 1994, and the heating oil UST was decommissioned by a post-military owner in the 1990s. The dispenser island pumps were also removed during decommissioning, but the island and underground piping were left in place. During tank excavation, petroleum contaminated soils were encountered and removed. Excavation bottom and sidewall samples were collected, as well as samples of water encountered in the excavations. Based on the results of the samples, the 1995 UST Decommissioning Report recommended no further remedial actions. However, the PA recommended further action at AOPC 8B-1 with respect to the automotive fuel and waste oil tanks, specifically along the pipe runs because they were not characterized during the decommissioning. During the SI, sampling was conducted at the approximate location of the piping at a depth of 9.5 feet bgs (approximately 0.5 to 1 foot below the depth of the UST piping). Copper, manganese, and nickel were the only analytes detected in the SI soil samples above the project screening levels. All other analytes were non-detect or below screening levels. Subsequently, the previously identified metals were re-assessed and AOPC 8B-1 was recommended for no action based on the findings of the AOPC Status Update Technical Memorandum.

2.6.13 AOPC 8B-2

AOPC 8B-2 is located on property owned by the Northwest Laborers-Employers Training Trust Fund, within the commercial area of Adair Village. Historical documents indicated that there were two USTs

located at the Adair AFS Vehicle Maintenance Building Vehicle Fueling site, but the 1994 - 1995 decommissioning project only found one 2,800-gallon gasoline tank located west of the former maintenance center, which was subsequently removed. The dispenser island and underground piping associated with AOPC 8B-2 were left in place, but the tank pit was filled in during the decommissioning project. The dispenser island was later removed by the current property owners. No petroleum hydrocarbon contamination was detected at this site during tank removal. In 2005, ODEQ requested additional assessment to determine if AOPC 8B-2 could be a source of the petroleum contamination at AOPC 5C that was identified during road construction in 1991. The PA included a detailed discussion of more plausible sources of the petroleum contamination observed at AOPC 5C. Although no contaminated soils were found during tank excavation, the PA recommended additional sampling along the distribution piping in order to fulfill ODEQ requirements. Two samples were collected at AOPC 8B-2 during the SI. Diesel and volatile organic compound(s) (VOCs) were not detected in samples collected during the SI, and the concentrations of gasoline and heavy oil were below screening levels. Copper and nickel were present at concentrations slightly above background levels and above their respective ecological risk-based screening levels. Subsequent evaluation noted that copper and nickel were recommended in the SI for further investigation because sample concentrations exceeded ecologically based screening criteria. However, all of AOPC 8B-2 is paved and there is no ecological habitat near the site. Additionally, soil contamination within 3 feet of ground surface due to a UST petroleum release is unlikely, not only because the tank was underground, but also because clean imported material was used as backfill. Based on the analysis in the ODEQ PA and the SI report, no further action was required at AOPC-8B-2.

2.6.14 AOPC 9A-1

AOPC 9A-1 was investigated during the SI, including the collection of soil samples. The SI Report recommended AOPC 9A-1 for no action for all analytes, based on no detections above local background or screening levels.

2.6.15 AOPC 9A-2

AOPC 9A-2 was investigated during the SI, including the collection of soil samples. The SI Report recommended AOPC 9A-2 for no action for all analytes, based on no detections above local background or screening levels.

2.6.16 AOPC 9A-3

AOPC 9A-3 was investigated during the SI, including the collection of soil samples. The SI Report recommended no action for all analytes except nickel, based on no detections above background or screening levels. Subsequently, the Background Desktop Exercise Technical Memorandum recommended no action for nickel, based on comparison to updated background values.

2.6.17 AOPC 9A-4

AOPC 9A-4 was investigated during the SI, including the collection of soil samples. The SI Report recommended AOPC 9A-4 for no action for all analytes, based on no detections above local background or screening levels.

2.6.18 AOPC 9A-5

AOPC 9A-5 was investigated during the SI, including the collection of soil samples. The SI Report recommended AOPC 9A-5 for no action for all analytes, based on no detections above local background or screening levels.

2.6.19 AOPC 9A-6

AOPC 9A-6 was investigated during the SI, including the collection of soil samples. The SI Report recommended no action for all analytes except lead, nickel, and zinc, based on no detections above background or screening levels. Subsequently, the Background Desktop Exercise Technical Memorandum recommended nickel and zinc for no action based on comparison to updated background values. During the SI, lead was detected above background and regulatory levels in one surface soil sample within the drainage ditch on the western boundary of the site. During the RI, soil samples were collected from upstream and downstream of the elevated SI sample. The RI sampling identified the elevated lead detection from the SI to be an isolated occurrence and limited to a single sample point. RI samples collected immediately on either side of this location were not similarly elevated. Based on the RI report, no further action was required at AOPC 9A-6. Further discussion of the risk assessment conducted for AOPC 9A-6 is provided in Section 2.7.

2.6.20 AOPC 9A-7

As part of the PA conducted by BC, soil and groundwater samples were collected outside of the four oil houses at AOPC 9A-7. All results were non-detect, with the exception of the presence of lead in one groundwater sample. On the basis of this information, the BC PA concluded that cleanup levels had not been exceeded. In March 1991, ODEQ responded that no further action was required. The oil houses sampled during the BC PA represent only the southernmost portion of AOPC 9A-7; no samples were collected from the other associated maintenance areas of AOPC 9A-7. The PA recommended that AOPC 9A-7 not be included in the subsequent project on the basis of non-military industrial operations that have occurred since military use. ODEQ responded in December 2007 that post-military beneficial use did not seem likely to obscure the former military use and recommended that further investigation be conducted. The SI did not include AOPC 9A-7 in its sampling investigation on the basis of FUDS ineligibility. In the 2015 Technical Memorandum, USACE recommended AOPC 9A-7 for no action based on investigation results.

2.6.21 AOPC 9A-8

AOPC 9A-8 was investigated during the SI, including the collection of soil samples. The SI Report recommended no action for all analytes except nickel, based on no detections above background or screening levels. Additional soil samples were proposed to be collected for nickel analysis during the RI, but due to rainfall prior to fieldwork, the proposed sampling area was completely underwater. Although the RI was unable to supplement the SI data as planned, additional background samples collected during the RI increased the site-specific background data to higher concentrations than the previous background studies. After the SI results were re-evaluated the highest concentration of nickel was found to not be elevated relative to site-specific background. Based on the SI and the follow up background metals

evaluation, no further action or human health or ecological risk assessment was required at AOPC 9A-8. The RI report determined no further action was required at AOPC 9A-8.

2.6.22 AOPC 9A-9

AOPC 9A-9 was investigated during the SI, including the collection of soil samples. The SI Report recommended no action for all analytes except barium and copper, based on no detections above background or screening levels. Subsequently, the Background Desktop Exercise Technical Memorandum recommended barium and copper for no action based on comparison to updated background values.

2.6.23 AOPC 9A-10

AOPC 9A-10 was investigated during the SI, including the collection of soil samples. The SI Report recommended no action for all analytes except nickel, based on no detections above background or screening levels. Subsequently, the Background Desktop Exercise Technical Memorandum recommended no action for nickel based on comparison to updated background values.

2.6.24 AOPC 9A-11

AOPC 9A-11 was investigated during the SI, including the collection of soil samples. The SI Report recommended AOPC 9A-11 for no action for all analytes, based on no detections above local background or screening levels.

2.6.25 AOPC 9A-12

AOPC 9A-12 was not included in the SI due to FUDS ineligibility (post-DoD beneficial use). According to the PA, AOPC 9A-12 lies within the footprint of AOPC 9A-11. AOPC 9A-11 was investigated (and granted No Action) during the SI. On this basis, USACE recommended AOPC 9A-12 for No Action in the AOPC Status Technical Memorandum. ODEQ's response recommended that the location of AOPC 9A-12 be determined based on research and/or site reconnaissance and also recommended subsurface sampling in order to confirm no contamination at this AOPC. This recommended investigation was conducted during the RI, including collection of soil samples adjacent to each of the former structures and analysis for metals, diesel and motor oil, VOCs, and polycyclic aromatic hydrocarbons. Metals were detected in all samples at a wide range of concentrations depending on the analyte. The maximum concentrations of diesel and heavy oil did not exceed the screening levels. Several VOCs and several polycyclic aromatic hydrocarbons (PAH) were detected at the site. Based on the RI report, no further action was required at AOPC 9A-12. Further discussion of the risk assessment conducted for AOPC 9A-12 is provided in Section 2.7.

2.6.26 AOPC 9A-13

AOPC 9A-13 was investigated during the RI, including the collection of soil samples. AOPC 9A-13 consisted of an oil house and main building where ordnance repair activities occurred. The specific location of ordnance repair activities was not identified in records research nor during site visits to the area. Based on the lack of specific locations for biased sampling, surface soil samples were collected on

each side of the main site building and in the vicinity of the former oil house building. Samples were analyzed for explosives residue. No analytes were detected so no human health or ecological risk assessment was necessary, and the site was recommended for no action in the RI Report.

2.6.27 AOPC 9B-1

Site reconnaissance was conducted at AOPC 9B-1 during the SI. Site reconnaissance did not identify any criteria that would warrant sampling such as floor drains, areas of stained soils or stressed vegetation, mounds, depressions, or other man-made features that could be a source of contamination. However, the SI Report mistakenly omitted the no action recommendation for AOPC 9B-1. USACE recommended AOPC 9B-1 for no action in the 2015 Technical Memorandum, based on no indication of environmental impacts from past practices at the site.

2.6.28 AOPC 9C

The PA recommended No Action due to subsequent non-military beneficial use at AOPC 9C. ODEQ denied the No Action request and recommended further investigation. AOPC 9C was not investigated in the SI, however USACE conducted the recommended investigation during the RI. During the RI, subsurface soil samples were collected below each side of the grease interceptor associated with AOPC 9C. The detected concentrations of analytes were all below screening levels. Based on the RI report, no further action was required at AOPC 9C. Further discussion of the risk assessment conducted for AOPC 9C is provided in Section 2.7.

2.6.29 AOPC 10

All components of the former Air Force wastewater system are being beneficially used by the City of Adair Village. As such, the PA recommended the former sewage treatment plant for no action.

2.6.30 AOPC 11 (A, B, C)

Although a hazardous substance release may have occurred from the ash/cinders during the two to four years of use of the boiler houses associated with AOPC 11, no further investigation was proposed in the PA because of the minimal time of use, the likely minimal amount of ash/cinders released during operation, and the time since the release. (Note: Previous documents referred to the boiler houses collectively as AOPC 11. This DD identifies the boiler houses separately as AOPC 11A, 11B, and 11C.)

2.6.31 AOPC 12A

During 1985 site visits, USACE discovered “abandoned” transformers. The transformers were tested and found to contain less than 50 parts per million (ppm) polychlorinated biphenyls (PCBs). The transformers were then disposed of as non-PCB transformers. The PA recommended AOPC 12A for no action but ODEQ requested evidence that would show that the transformers disposed in the 1980s were the original transformers. Due to the lack of available historic information, further investigation was performed during the RI. The RI Work Plan proposed to collect soil samples in the vicinity of the concrete pad(s) for the former transformers. Despite a comprehensive search, no evidence of concrete pads or former transformers was encountered at the site. As a result, no samples were collected and no human health or ecological risk assessment was conducted. The RI recommended no action for AOPC 12A.

2.6.32 AOPC 12B

In the 1980s, USACE personnel visited AOPC 12B (located at the Adair Village Supply Water Pumping Plant) to look for abandoned transformers. Documentation did not show a discovery of any transformers, and the absence of abandoned transformers was subsequently confirmed with the plant operator. The PA recommended AOPC 12B for no action, but ODEQ suggested that further investigation may be warranted for AOPC 12B. During the RI, soil samples were collected in the vicinity of a concrete pad and analyzed for PCBs. PCBs were not detected in any of the samples collected and no human health or ecological risk assessment was necessary. The RI recommended no action for AOPC 12B.

2.6.33 AOPC 13

The PA recommended no action for the former landfill at AOPC 13 since it is located within the confines of the current landfill. The cell of the landfill that the military used has been reworked and altered since military use, and the current landfill is a privately owned landfill actively regulated through the state.

2.6.34 AOPC 14

No action was recommended for AOPC 14 in the PA as well as in the AOPC Status Update Technical Memorandum, but ODEQ did not concur with these recommendations. During the RI, soil sampling was conducted in the vicinity of basins and drainage traverses at AOPC 14. Detected petroleum hydrocarbons and VOCs were below their respective lowest applicable screening level, and the RI recommended no action for AOPC 14. Further discussion of the risk assessment conducted for AOPC 14 is provided in Section 2.7.

2.6.35 AOPC 15

AOPC 15 is non-localized, pertaining to general industrial activities at the former Camp Adair. The non-DoD industrial process areas at AOPC 15 shared areas with DoD-era vehicle maintenance facilities, paint warehouse, and coal storage. In the PA, AOPC 15 was recommended for no action because the industrial processes are not of military origin, and any need to address possible DoD hazards in adjacent or overlapping areas would be done under other active AOPCs (specifically AOPC 2, the coal storage yard). As stated in Section 2.6.2, based on the SI and RI recommendations, no further action was required at AOPC 2.

2.7 Current and Potential Future Land Use

This section describes the current and future land uses for the site, with specific focus on the AOPCs addressed in this DD.

Prior to the Army's acquisition and occupation of the former Camp Adair lands, farming was the predominant land use. The surrounding area was also predominantly used for agriculture and forestry. Farming varied from small berry farms, orchards, and vineyards to larger general purpose and livestock farms. A significant portion of mountainous land was unfarmed and forested. Upon closure, all but 736 acres of the former Camp Adair lands were transferred to various federal, state, and local governmental agencies; educational organizations; private companies; and individuals. The majority of the former

Camp Adair is owned by Oregon Department of Fish and Wildlife and used for public day-use recreation, with a hunting season from September through February. There are three AOPCs (AOPC 9A-6, AOPC 9A-8, and AOPC 9A-13) that are located within the EEWWA. The EEWWA covers approximately 1,788 acres and is a game management area used for recreational activities.

Portions of the former Camp Adair are industrial-zoned property. A Georgia-Pacific plywood plant occupied a portion of former Camp Adair from 1960 to 1973. In 1973, BC purchased the property and converted the operation from plywood to veneer production until it was closed in 1981. The industrial-zoned property is currently under development and owned by the City of Adair Village. Other industrial operations at the former Camp Adair site are conducted on property owned by Valley Landfill, Inc., where the processing and recovery of yard debris compost and urban wood recycling take place. The City of Adair Village owns other areas including the former Army hospital and U.S. Air Force housing and operations areas. Current land use zones in Adair Village are residential, public, limited industrial, educational facilities, and commercial. Adjacent areas to the north and west of former Camp Adair are residential.

The USACE expects the areas of the AOPCs to continue to be used as industrial and open space, and future residential use is unlikely. Based on available data and the current and expected future land use, no cleanup is required under CERCLA for these AOPCs.

2.8 Summary of Site Risks

The human health risk and ecological assessments in the RI evaluated potential threats to human health and ecological receptors associated with exposure to specific chemicals, for current and future anticipated conditions, and in the absence of any remedial action.

The purpose of the cleanup decision process is to implement cleanup activities, if determined necessary, that eliminate, reduce, or control risks to human health and the environment. The human health risk and ecological assessments for the AOPCs covered in this DD determined whether chemicals within each of the AOPCs posed risks that warranted action or potentially triggered cleanup. The risk assessments were consistent with USEPA guidance and generally followed State of Oregon guidance.

CERCLA provides a range of acceptable risk values to assess whether federal cleanup is necessary based on potential threats to human health. The USEPA established an acceptable excess cancer risk range, from 1 in 10,000 (or 10^{-4}) to 1 in 1,000,000 (or 10^{-6}) over a person's lifetime. An excess lifetime cancer risk of 1 in 10,000 indicates that an individual experiencing the reasonable maximum exposure estimate for current and future land use has a 1 in 10,000 chance of developing cancer because of site-related exposure.

Non-cancer human health effects are evaluated by comparing an exposure level over a specified period (e.g., lifetime) with a reference dose that represents a maximum level an individual may be exposed to without adverse effects. The USEPA (and ODEQ) established a non-cancer hazard index threshold of 1 to indicate that adverse non-cancer effects are unlikely.

Effects to ecological receptors are assessed using the hazard quotient approach. This method is based on the ratio of an exposure concentration to an effects concentration. HQs greater than 1.0 (i.e., where the

exposure concentration exceeds the effects concentration) indicate significant potential for adverse effects. HQs less than 1.0 are considered insignificant and adverse effects are unexpected. Higher HQs are not necessarily indicative of more severe effects, but instead, may suggest a greater likelihood of adverse effects.

2.8.1 Human Health Risk Assessment Summary

The human health risk evaluation examined all data collected previously for the respective AOPC. It compared available soil data with relevant human health screening level benchmarks. Potentially complete exposure pathways, or lack thereof, were also evaluated as part of the risk evaluation. The human health risk assessment provides a quantitative estimate of cancer risk and health hazards associated with exposure to chemicals of concern for the Project. Risk assessment methods and procedures used during the RI were consistent with ODEQ and CERCLA guidance.

2.8.1.1 AOPC 9A-6

The SI and Background Desktop Study Technical Memorandum determined that lead was the only remaining analyte of concern for this AOPC. The single elevated SI sample location (AOPC9A6-SL-05; 420 milligrams per kilogram (mg/kg) lead) was found to be a statistical outlier. The sample was collected from a ditch very close to the roadway. Without this outlier, the on-site concentrations of lead were not statistically significantly greater than site-specific background. RI samples collected immediately below and on either side of this location were not similarly elevated. Since this AOPC is located within the wildlife management preserve area and the current and future usage is commercial, the applicable human health soil risk-based criteria are Occupational, Construction Worker, and Excavation Worker. The maximum detected concentration of lead (420 mg/kg) was less than the lowest human health screening criteria (800 mg/kg for Occupational, Construction Worker, and Excavation). As the SI findings at location AOPC9A6-SL-05 could not be replicated in the RI sampling and the concentrations of lead in the remaining 13 on-site samples were consistent with the site-specific background lead concentrations, based on the RI recommendation, no further human health risk evaluation was necessary.

2.8.1.2 AOPC 9A-12

This AOPC was not sampled during the SI. RI soil samples from this AOPC were analyzed for metals, petroleum hydrocarbons, VOCs, and PAHs. Soil samples from this former fuel distribution site resulted in certain metal concentrations greater than regional background (South Willamette Valley) for antimony, copper, lead, and selenium. The RI data for antimony, copper, lead, and selenium were statistically compared to site-specific background concentrations, and antimony and copper were found to be statistically significantly elevated relative to background. No site-specific background data were available for selenium. Since this AOPC is located within the wildlife management preserve area and the current and future usage is commercial, the applicable soil risk-based criteria are again Occupational, Construction Worker, and Excavation Worker. The maximum detected concentrations of antimony, copper, and selenium, were less than their respective lowest direct contact screening levels.

The detected concentrations of petroleum hydrocarbons (diesel and waste oil) and VOCs were below the applicable risk-based criteria and therefore were determined not to be analytes of concern for this AOPC.

The concentrations of detected carcinogenic PAHs were multiplied by their respective toxicity equivalency factor to estimate their toxicity relative to benzo(a)pyrene. The resulting concentrations were summed to define a total benzo(a)pyrene toxic equivalent concentration. The maximum calculated concentration of PAHs as benzo(a)pyrene equivalents was less than respective lowest direct contact screening levels. Based on the field results and analysis within the RI report, no further action is required at AOPC 9A-12.

2.8.1.3 AOPC 9C

This AOPC was not sampled during the SI. RI soil samples from this AOPC were analyzed for metals, petroleum hydrocarbons, VOCs, and PAHs. Soil samples from this former fuel distribution site resulted in certain metal concentrations greater than regional background (South Willamette Valley) for chromium, copper, nickel, and selenium. The RI data for chromium, copper, and nickel were statistically compared to site-specific background concentrations, and chromium, copper, and nickel were found to be statistically significantly elevated relative to background. No site specific background data were available for selenium. As AOPC 9C is owned by the Northwest Laborers-Employee Training Trust Fund and the current and future usage is commercial, the applicable soil risk-based criteria are Occupational, Construction Worker, and Excavation Worker. The maximum detected concentrations of aluminum, chromium, cobalt, copper, iron, nickel, and selenium were less than their respective lowest direct contact screening levels. Therefore, no further human health risk evaluation for metals was necessary.

The detected concentrations of petroleum hydrocarbons (gasoline and waste oil), VOCs (methylene chloride and tetrachloroethene), and PAHs (naphthalene, fluoranthene, and benzo(g,h,i)perylene) were below the lowest applicable risk-based criteria. Therefore, no further human health risk evaluation for these analytes was necessary. Thus, based on the field samples and the analysis within the RI report, no further action was required at AOPC 9C.

2.8.1.4 AOPC 14

This AOPC was not sampled during the SI. Based on the site history, VOCs and petroleum hydrocarbons were identified as possible analytes of concern for this AOPC. The detected petroleum hydrocarbons (gasoline range) and VOCs were below their respective lowest applicable direct contact risk-based screening criteria. Therefore, no further human health risk evaluation was necessary.

2.8.2 Ecological Risk Assessment Summary

A Screening Level Ecological Risk Assessment was conducted as part of the RI. This evaluation examined all data collected previously for the respective AOPC. It compared available soil data with relevant ecological screening level benchmarks. Exposure pathways, or lack thereof, were also evaluated as part of the risk evaluation. Summary of risk assessment activities for each applicable AOPC follows.

2.8.2.1 AOPC 9A-6

Given the single elevated detection of lead at this AOPC, as well as the marginal habitat value present and future land use for this area, the exposure and associated risk to ecological receptors are considered to be low. Therefore, an ecological risk assessment was not necessary.

2.8.2.2 AOPC 9A-12

Aluminum, copper, and iron were evaluated in the ecological risk assessment. Evaluation indicated that copper exceeded both its background concentration and its lowest applicable ecological screening level. Aluminum and iron lacked corresponding background and ecological screening values.

The lowest ecological screening value for copper falls below both the site-specific background concentration and the regional background concentration. Based on this comparison, the screening value appears to be overly conservative for this site. Copper is known to have phytotoxic properties and any denuded areas lacking vegetative cover should be viewed with scrutiny relative to the presence of elevated levels of copper at these locations. However, results of the site reconnaissance revealed the presence of an established herbaceous plant community and, as such, phytotoxic effects do not appear to be present or significant.

Aluminum is a non-essential element for terrestrial flora and fauna. USEPA states that aluminum should only be identified for evaluation for soils with a pH below 5.5. The Willamette soil series has a pH that ranges from 5.6 to 5.9 SU which is greater than the 5.5 threshold for associated toxic effects for this metal. Therefore, aluminum was not retained for evaluation.

Iron is an essential macro-element for terrestrial flora and fauna, and species have adapted to respond to its availability through a variety of mechanisms. Negative effects from iron deficiency or iron toxicity are not expected in soils within a pH range from 5 to 8. Therefore, iron was not retained for evaluation.

2.8.2.3 AOPC 9C

While several metals were tentatively identified as potentially of ecological concern, the presence of an impervious cover makes contact with surface soils unlikely. The presence of opportunistic weed growth in imperfections and cracks of this cover indicates that toxic effects to plants are not occurring. Based on anticipated future use of this area, there is minimal potential risk of exposure to any metals on this site to ecological receptors.

2.8.2.4 AOPC 14

The maximum detected concentrations of analytes were well below their respective lowest screening criteria. Therefore, no ecological risk evaluation was necessary.

2.8.3 Site Risk Conclusions

Petroleum compounds, PAHs, VOCs, and metals were detected in several samples in soil. However, based on the human health risk and ecological assessments, the USACE found no actionable human health or ecological effects attributable to past DoD activities at the AOPCs addressed in this DD. Results from previous investigations and expected land use show that no cleanup is required for the AOPCs. The current land use of each area is expected to continue into the foreseeable future, therefore, land use restrictions or other institutional controls to prevent future residential use are not needed.

2.9 Documentation of Significant Changes

The Proposed Plan detailing the No Action recommendation for the AOPCs was released for public comment on November 6, 2017. No comments were received from the public during the comment period. Therefore, no significant changes to the proposed No Action recommendation were necessary.

As noted in Section 2.6.30, previous documents referred to the boiler houses collectively as AOPC 11. This DD identifies the boiler houses separately as AOPC 11A, 11B, and 11C. The designation of AOPC 11 as three separate AOPCs resulted in the total number of AOPCs addressed by this DD to increase to 45 (compared to the 43 AOPCs identified in the Proposed Plan).

Section 3 **Responsiveness Summary**

3.1 Stakeholder Issues and Lead Agency Responses

The USACE placed a public notice in the *Albany Democrat Herald* and the *Corvallis Gazette-Times* soliciting comments on the No Action Proposed Plan. The notice was published on November 1, 2017 and November 4, 2017, and a public comment period was open from November 6 through December 13, 2017. In addition, the USACE sponsored a public meeting on November 15, 2017 in Adair Village, Oregon to present the Proposed Plan, including a summary of the investigation and risk assessment results and to accept public comments. Only one member of the public attended the meeting. No comments were received during the public comment period or at the public meeting. Consequently, no changes were made to the no action Proposed Plan that will be implemented with approval of this No Action DD. A transcript of the meeting is available in the Administrative Record file at the USACE Kansas City District office and at the Independence Public Library.

The ODEQ concurs with the USACE's decision of No Action at the AOPCs addressed by this DD.

3.2 Technical and Legal Issues

No technical or legal issues were identified during the public review period of the Proposed Plan.

Section 4 **References**

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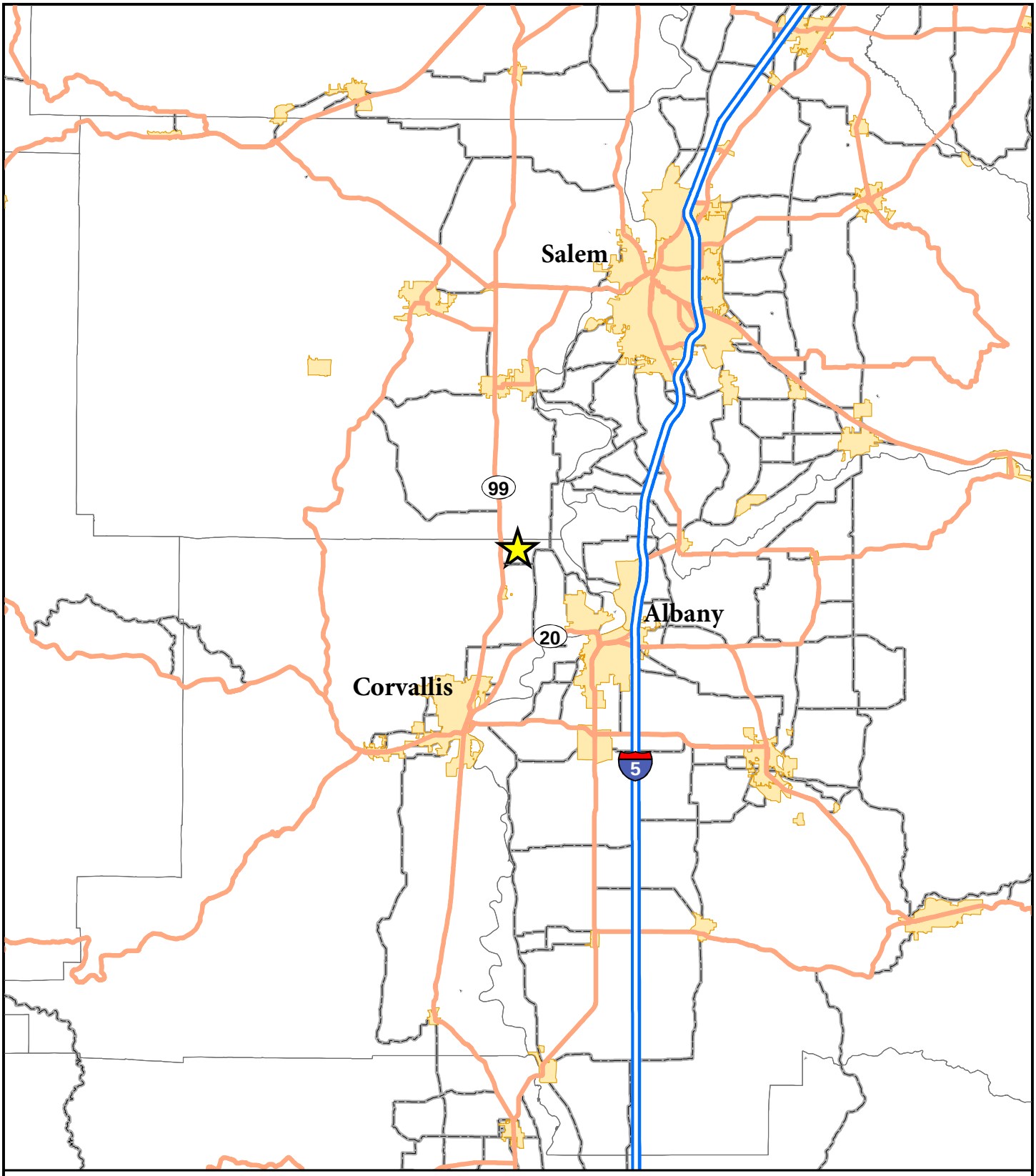
Figures



CAMP ADAIR

INTERSTATE

HIGHWAY

ROAD

N

4 0 4 8

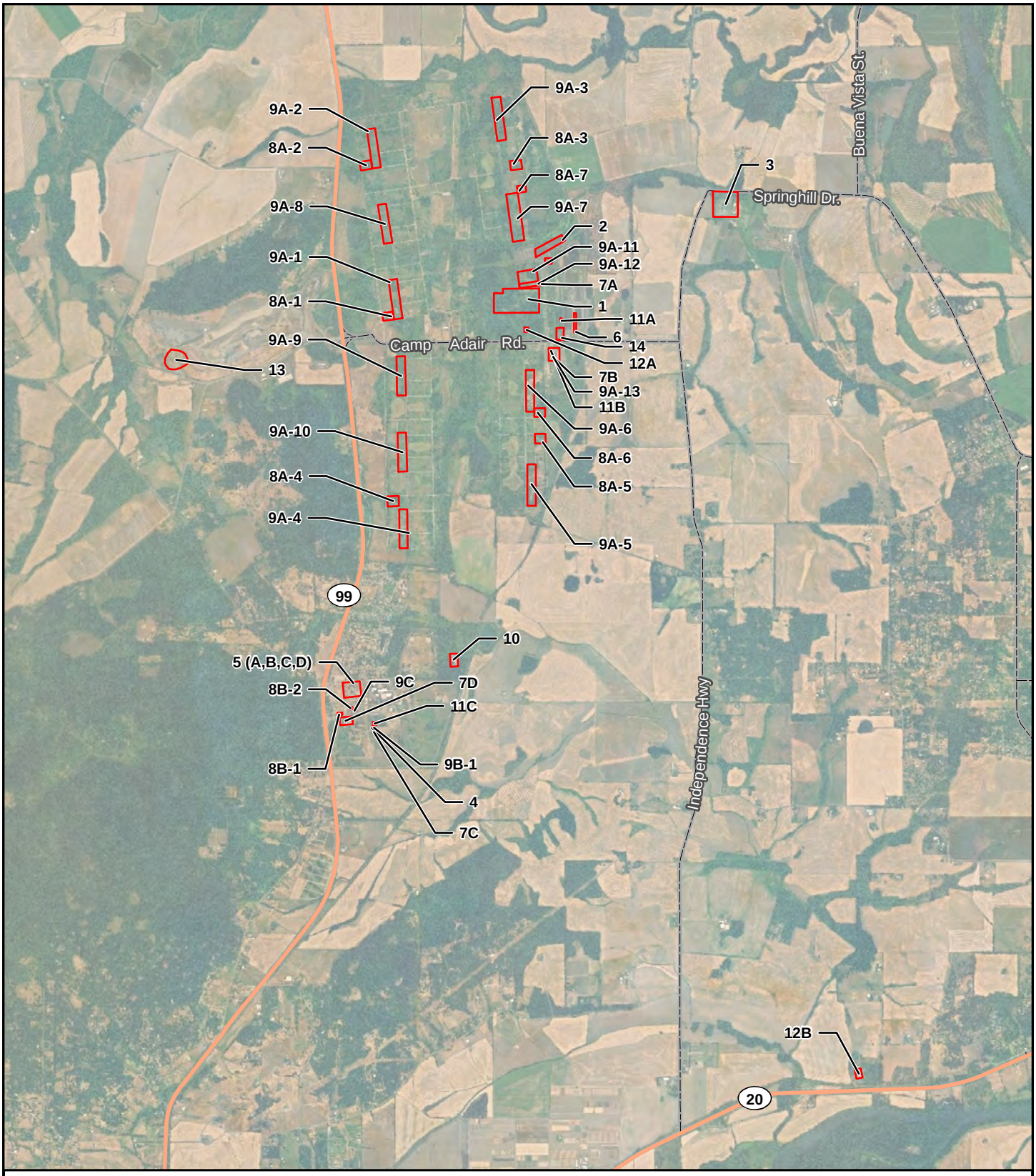
Miles

TriEco
A Joint Venture

Former Camp Adair
Adair Village, Oregon

FIGURE 1
CAMP ADAIR LOCATION MAP

Record of Decision



AOPC SITE

HIGHWAY

Notes:
AOPC Area of Potential Concern

AOPC 15 consists of industrial process areas co-located with other active AOPCs at the site and therefore this AOPC is not shown on the figure.

N

0.5 0 0.5 1
Miles

TriEco
A Joint Venture

Former Camp Adair
Adair Village, Oregon

FIGURE 2
AOPC LOCATIONS

Record of Decision