



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

Northwest Region Portland Office

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August 16, 2023

Gresham-Barlow School District No. 10Jt  
2020 Southeast Fleming Avenue  
Gresham, Oregon 97080

**Re: DEQ Comments on *Site Assessment Work Plan***  
East Gresham Elementary School (LUST #26-95-0187)  
900 Southeast 5<sup>th</sup> Street, Gresham, Oregon 97080

Dear Terry Taylor:

The Oregon Department of Environmental Quality (DEQ) has reviewed the document entitled *Site Assessment Work Plan* (work plan) submitted on your behalf by PBS Engineering and Environmental (PBS) on July 31, 2023, for the East Gresham Elementary School property located at 900 Southeast (SE) 5<sup>th</sup> Street in Gresham, Oregon (site). Based on DEQ's review of the work plan, DEQ has prepared the following comments:

- 1) DEQ agrees with the proposed locations for the three groundwater monitoring wells (MW-2R, MW-5R, and MW-7R) and three soil gas monitoring points (SG1 through SG3).
- 2) Due to the close proximity to the west adjacent residences, an additional soil gas monitoring point should be installed along the fence line near monitoring well MW-7R.
- 3) As of June 1, 2023, DEQ has adjusted its risk-based concentrations for the vapor intrusion pathway to align with the United States Environmental Protection Agency's Vapor Intrusion Screening Levels and is in the process of updating the DEQ vapor intrusion guidance document. Based on the anticipated changes, DEQ recommends collecting soil gas data from SG1 at two depths. The recommended default depths are 5 feet and 10 feet below ground surface; however, DEQ understands the ability to collect samples will depend on groundwater conditions at the site, which are known to vary seasonally.

DEQ requests the work plan is revised and submitted for DEQ approval prior to commencing work. Please contact me by phone (503) 926-2257 or email ([rebecca.digiustino@deq.oregon.gov](mailto:rebecca.digiustino@deq.oregon.gov)) if you have questions.

Sincerely,

Rebecca Digiustino  
Project Manager  
Northwest Region Cleanup Program

cc: Bret Waldron, PBS  
LUST File No. 26-95-0187