



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

August 5, 2021

S.E. Moores II, LLC
c/o Kenneth M. Simpson
4007 NE 3rd St.
Gresham, OR 97030

RE: Further Action Required
for SE Moores Site in Milwaukie
ECSI #6352

Dear Mr. Simpson:

The Department of Environmental Quality (DEQ) has completed its review of the *Limited Soil Gas Investigation* report prepared by GeoDesign, Inc. DBA NV5 on May 7, 2021 for the SE Moores Site, located at 2405-2415 SE Moores Street in Milwaukie.

DEQ understands that an oil/water separator (OWS) on the west side of the Tice Industries building was decommissioned by removal on June 1, 2020. Confirmation soil samples collected from the edges of the excavation pit were analyzed for diesel and heavy oils. Heavy oils were present in three of the four pit wall samples at levels exceeding site-specific risk-based concentrations (RBCs) for direct contact by construction workers.

One pit wall sample, from the east edge of the excavation (against the building), was analyzed for additional contaminants of interest. Gasoline and naphthalene were detected at concentrations exceeding screening-level RBCs for vapor intrusion into indoor air.

GeoDesign/NV5 collected two soil gas and two sub-slab vapor samples in February 2021 to investigate the potential vapor concerns at the site. Naphthalene was not detected in the vapor samples, and gasoline concentrations were below levels of concern. However, trichloroethene (TCE) was detected in a sub-slab vapor sample at a concentration above screening-level RBCs. GeoDesign/NV5 collected another sub-slab vapor sample from the same location in March 2021 to verify the result. The TCE concentration in the second sample was higher than in the first sample.

Based on the results from the soil gas and sub-slab vapor sampling, it appears that gasoline and naphthalene vapors are not a concern at the SE Moores Site. However, DEQ is concerned with the TCE detections.

TCE is a chlorinated solvent that can pose significant risks at relatively low concentrations. The source of the TCE vapors and the extent of the TCE contamination is unknown, so it is not known where on your property the highest concentrations of TCE may be located, or if those

concentrations exceed occupational RBCs. Further investigation of the TCE contamination is necessary to determine potential risks to the occupants of the Tice Industries building.

In addition, the oil-contaminated soils around the former OWS that exceed construction worker RBCs may require a deed restriction to be placed on your property, if the soils are not removed or further delineated. The deed restriction (formally known as an Easement & Equitable Servitudes, or EES) would not prohibit redevelopment or reuse of your property, but would require future construction work near the former OWS to follow a Soil Management Plan approved by DEQ.

Please provide DEQ with a proposed scope of work for determining the nature and extent of TCE contamination at your site. I can be reached at (503) 229-5369 or by e-mail at kevin.dana@deq.state.or.us if you have any questions or concerns about this letter. DEQ appreciates your efforts in investigating and remediating the residual contamination on your property.

Sincerely,

A handwritten signature in blue ink that reads "Kevin Dana".

Kevin Dana, Project Manager
Northwest Region Cleanup Program

cc: Lon Yandell, GeoDesign/NV5
ECSI #6427 File