



# Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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January 24, 2022

via electronic delivery

Kevin McGrath  
Director of Real Estate Development  
Progressive Casualty Insurance Company  
5920 Landerbrook Drive  
Mayfield Heights, OH 44124

Re: Progressive Insurance Property (former), 8155 SE 82<sup>nd</sup> Ave., Portland  
ECSI # 6207

Dear Kevin McGrath:

The Department of Environmental Quality has reviewed GHD Services' *Groundwater Monitoring Report Fourth Quarter 2021* dated December 21, 2021 for the former Progressive site located at 8155 SE 82<sup>nd</sup> Ave. in Portland, Oregon. This report represents the last quarterly groundwater monitoring event required by DEQ prior to evaluating the need for additional remedial actions.

The following actions are required to be completed and submitted to DEQ, by **March 31, 2022**, to determine if additional remedial actions are necessary at the site.

1. Update the conceptual site model (CSM) in accordance with DEQ's 2017 *Risk-Based Decision Making for the Remediation of Contaminated Sites* guidance. This includes determining the locality of the facility (LOF) as defined in Oregon Administrative Rule (OAR) 340-122-0115(35). The LOF should be depicted graphically in addition to written description.
2. Determine if the light non-aqueous phase liquid (LNAPL) is a hot spot as defined in OAR 340-122-0115(32).
3. Complete an ecological screening or determine the site is excluded in accordance with DEQ's September 2020 *Conducting Ecological Risk Assessments* guidance (<https://OregonDEQ/xt5YM>).
4. Screen all data, including soil gas and indoor air sampling data, collected by AAA on the former Progressive property (available on-line at <https://OregonDEQ/xt83h>) and from the Cartlandia site ECSI No. 6332 (available on-line at <https://OregonDEQ/xt83z>), against applicable risk-based concentrations (RBCs).

5. Summarize and discuss any exceedances of applicable RBCs and what, if any, remedial actions need to be performed for conditions to be protective of human health and the environment.

If you have any questions please contact me at 503-860-3943 or by email at [Katie.Daugherty@deq.oregon.gov](mailto:Katie.Daugherty@deq.oregon.gov).

Sincerely,

*Katie Daugherty*

Katie Daugherty, R.G  
Project Manager  
Cleanup and Leaking UST Section  
Northwest Region

cc: Randy Moore, GHD  
ECSI File No. 6207