

Department of Environmental Quality

Northwest Region

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June 4, 2020

Andy Klopfenstein Point Source Solutions, LLC 10445 SW Canyon Rd., Suite 266 Beaverton, OR 97005

RE: Comments on May 2020 Project Update

for Allyn's Cleaning & Dyeing in Portland

ECSI #6199

Andy:

The Department of Environmental Quality (DEQ) has completed its review of the *May 2020 Project Update and Work Plan*, prepared by Point Source Solutions on May 13, 2020 for the former Allyn's Cleaning & Dyeing site, located at 1006-1024 SE Grand Avenue in Portland.

DEQ understands that environmental investigations at the site began in 2012, when Chugwater LLC conducted a Phase I Environmental Site Assessment (ESA) of the Arcoa Building property at 1006 SE Grand Avenue. The Arcoa Building occupied the northwest quarter of the city block bounded by SE Yamhill Street to the north, SE Taylor Street to the south, SE 6th Avenue to the east, and SE Grand Avenue to the west. A surface parking lot associated with the Arcoa Building covered the northeast quarter of the block. The Phase I ESA identified at least one Recognized Environmental Condition (REC): Allyn's Cleaning & Dyeing, which operated immediately south of the Arcoa Building from about 1909 to 1959. (The Arcoa Building was constructed in 1907).

In December 2012, Chugwater collected 14 soil samples and one groundwater sample from 10 borings at the Arcoa Building property, followed by three soil gas samples in February 2013. Soil samples near the center of the block showed diesel at a concentration of 7,100 parts per million (ppm) and gasoline-range hydrocarbons (identified as Stoddard solvent, a dry cleaning chemical) at 310 ppm. The groundwater sample, also from the center of the block, showed Stoddard solvent at a concentration of 2,200 parts per billion (ppb) and perchloroethene (PCE or "perc", another dry cleaning chemical) at 53 ppb. Volatile organic compounds (VOCs) were detected in the soil gas.

In October 2016, Point Source Solutions completed a Phase I ESA for the south half of the block, referred to as the Caldwell Property. The southeast quarter of the block was occupied by a warehouse (built in 1921) that currently housed several auto repair and detailing companies. A building on the southwest quarter of the block (constructed in 1920) had housed an auto repair shop in the 1920s and '30s and auto sales and service in the 1950s and '60s, but now housed a 7-

Eleven convenience store. (Allyn's Cleaning & Dyeing operated between the Arcoa Building and the 7-Eleven, in what is now an alleyway between the two buildings).

Point Source identified five former hydraulic hoists in the western half of the auto warehouse. Soil samples were collected beneath the hoists in December 2016. Gasoline-range hydrocarbons (Stoddard solvent) were detected in soils beneath the northernmost hoist (closest to the center of the block) at a concentration of 12,800 ppm. Soil samples collected on the 7-Eleven property in January 2017 identified Stoddard solvent beneath the east end of the store at concentrations up to 21,800 ppm. Additional soil sampling on both properties in March 2017 identified up to 18,300 ppm Stoddard solvent beneath the northwest quarter of the auto warehouse, along with VOCs. Point Source estimated that 1,000 to 1,100 cubic yards of solvent-impacted soils were present beneath the Caldwell Property.

Five groundwater monitoring wells were installed across the block in August 2019. A soil sample from MW-5, in the center of the block, showed 23,100 ppm Stoddard solvent at nine feet bgs, and a soil gas sample from the same location in December 2019 showed 1,500,000 micrograms per cubic meter ($\mu g/m^3$) of Stoddard, along with other VOCs. The monitoring wells were sampled in October 2019 and February 2020, finding up to 1,100 ppb Stoddard in the groundwater at the former Allyn's Cleaning location.

DEQ has a handful of comments on the *Project Update and Work Plan*:

- 1. The bore logs/well logs for the five monitoring wells should be included in the report.
- 2. The May 2020 sampling results and laboratory reports should be included in the report.
- 3. Information in some of the tables is missing or incomplete. For example, in Table 2, samples from SB-1 through SB-8 were collected on 12/5/12; samples from SB-3 through SB-6 should show "ND" for VOCs at both sampling depths, and SB-8 was not analyzed for VOCs. Information in the tables should be re-confirmed.

Additional sampling may also be needed to determine the extent of soil, groundwater, and vapor contamination at the site. In particular, DEQ recommends installing a sixth groundwater monitoring well near the southwest corner of the 7-Eleven building to determine the extent of the groundwater plume that appears to be migrating west or southwest from the center of the block.

Please prepare a revised and updated version of the *May 2020 Project Update and Work Plan*. DEQ requests one bound hard copy and one electronic copy for our records. If you have any questions, please contact me at (503) 229-5369, or via e-mail at dana.kevin@deq.state.or.us.

Sincerely,

Kevin Dana, Project Manager

Verin Dana

Northwest Region Cleanup Program

cc: Jeff Mincheff, Arcoa Partners

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