



Oregon

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Department of Environmental Quality

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Andy Klopfenstein
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RE: Comments on RBCA Determination
for Allyn's Cleaning & Dyeing in Portland
ECSI #6199

Andy:

The Department of Environmental Quality (DEQ) has completed its review of the *Site-Specific Risk-Based Corrective Action Determination* report, prepared by Point Source Solutions on February 18, 2021 for the former Allyn's Cleaning & Dyeing site, located at 1006-1024 SE Grand Avenue in Portland.

The Allyn's Cleaning project site covers 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. The Arcoa Building, a 3-story office building, occupies the northwest quarter of the block, and a surface parking lot is on the northeast quarter. A 7-Eleven convenience store (southwest quarter) and the former Japanese Auto Repair warehouse (southeast quarter) cover the rest of the block. Allyn's Cleaning & Dyeing operated from 1909 to 1959 from a small building near the center of the block, in what is now an alleyway between the Arcoa and 7-Eleven buildings.

Investigations conducted at the project site since 2012 have identified dry cleaner solvents and volatile petroleum hydrocarbons in the soil, groundwater, soil gas, and sub-slab vapors at the site. As summarized in the *RBCA Determination* report, most of these contaminants are present at concentrations below DEQ's risk-based concentrations (RBCs) for commercial occupants, and no additional action is needed to protect occupants of the site from the contamination. However, there are exceptions that need to be addressed.

First, carbon tetrachloride and chloroform are present in soil gas and/or sub-slab vapors on the Arcoa Building property at concentrations exceeding RBCs for vapor intrusion into occupational buildings. Chloroform has also been detected inside the Arcoa Building at concentrations exceeding occupational inhalation RBCs. Although a leaking water supply line is suspected as the source of the chloroform contamination, no source has actually been identified. Also, the presence of chloroform vapors inside the building suggest that carbon tetrachloride vapors may enter the building via the same route(s). Additional actions are necessary to demonstrate that the occupants of the Arcoa Building are protected from chloroform exposures and potential carbon tetrachloride exposures.

Second, in March 2017, tetrachloroethene (PCE) was detected in soils beneath the Japanese Auto Repair building at concentrations up to 12.9 parts per million (ppm), exceeding the RBC of 2.3 ppm for vapor intrusion into commercial buildings. No sub-slab or indoor air samples have been collected to determine if PCE vapors pose an unacceptable risk to current or future occupants of the building. Additional actions are necessary to demonstrate that occupants of the Japanese Auto Repair building are protected from PCE exposures.

There is also a data gap concerning potential ecological risks. Stoddard solvent (measured as gasoline-range organics) was detected in monitoring well MW-4 at concentrations up to 2,200 parts per billion (ppb), exceeding DEQ's freshwater ecological screening level value (SLV) of 640 ppb. Monitoring well MW-4 is on the western, downgradient side of the block, and the downgradient extent of the Stoddard solvent has not been determined. Please evaluate the potential ecological risks in accordance with DEQ's guidance on *Conducting Ecological Risk Assessments* (September 14, 2020).

Finally, there are two long-term concerns that apply to the project site. First, Stoddard solvent is present in soils on the Arcoa, 7-Eleven, and Japanese Auto Repair properties at concentrations exceeding RBCs for direct contact by construction workers. Second, 12 contaminants are present in soils and/or soil gas on the block at concentrations exceeding urban residential vapor intrusion RBCs. Although not currently planned, redevelopment of some or all of the block for urban residential use is allowed under the current zoning. To protect future residents and provide notice to future construction workers, deed restrictions should be placed on each of the three tax lots on the block requiring DEQ review and approval of a Soil Management Plan prior to conducting subsurface work on the site. The restrictions will not prohibit construction or redevelopment, but only require DEQ approval of construction and redevelopment plans to ensure the health and safety of any future construction workers and/or residents at the site.

Once the data gaps regarding vapor intrusion and ecological risks have been addressed, and once deed restrictions have been recorded on the lots, DEQ believes that the Allyn's Cleaning & Dyeing site will qualify for a Conditional No Further Action determination (subject to a 30-day public notice and comment period).

Please let me know if you have any questions or comments about this letter. I can be reached via phone at (503) 229-5369, or via e-mail at kevin.dana@deq.state.or.us.

Sincerely,



Kevin Dana, Project Manager
Northwest Region Cleanup Program

cc: Jeff Mincheff, Arcoa Partners
Michael Greeninger, WYSE Real Estate Advisors
ECSI #6199 File