



THE
IRWIN-HODSON
COMPANY

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September 10, 2024

via electronic delivery to all recipients

Mr. Jim Orr
NWR DEQ Project Manager
700 NE Multnomah Street, Suite 600
Portland, OR 97232

Subject: Irwin Hodson Follow-Up Comments to the Oregon Department of Environmental Quality (DEQ)
Letters dated August 26, 2024 and September 6, 2024

Dear Mr. Jim Orr,

This letter responds to your two letters dated August 26, 2024 and September 6th, 2024.

In response to the request in your August 26th letter, Irwin Hodson wishes to remain in the Voluntary Clean Up Program and Irwin Hodson commits to promptly submit a Feasibility Study under DEQ oversight in the Voluntary Clean Up Program (VCP). Irwin Hodson will submit this Feasibility Study (FS) from Lynn Green at EVREN Northwest, Inc. within the next ninety (90) days.

I would like to correct a number of misstatements in your letters. First, our records indicate that the last on-site observation by DEQ personnel was in January of 2023, not January 2024 as stated in the letter. DEQ personnel have not been on-site in almost two years. DEQ's statements in its September 6, 2024 letter regarding broken windows and "significant air movement" on-site are not current nor are these statements accurate. Irwin Hodson has been sampling indoor air on a quarterly basis since 2022 and DEQ's dated observations should not inform its characterizations of or confidence in the recent indoor ambient air sampling results. As requested in your September 6, 2024 letter, Irwin Hodson's consultant Evren Northwest will submit a work plan for future indoor sampling for DEQ review and approval.

This indoor air sampling work plan also will address your new concerns about benzene, ethylbenzene, and naphthalene, first raised in your September 6, 2024 letter. As you know from our consultant's quarterly monitoring reports, ambient indoor air concentrations of benzene and naphthalene are within the range of these constituents detected in outdoor air. This suggests that the source is outside rather than inside the building, according to our consultant. Additionally, as suggested in all our prior monitoring reports, detections of benzene, ethylbenzene, and naphthalene are likely from products stored onsite containing petroleum distillates identified in the pre-testing inventory.



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Further, your statements about “repeated requests” for a FS were a surprise to us. Our consultant EVREN Northwest communicated to DEQ that we have been collecting additional data over the first half of this year and it was Irwin Hodson’s understanding that DEQ would review the recent data that was collected in order to clarify the objectives of the FS. This data was submitted in June 2024. It is also our understanding that EVREN Northwest requested, and was denied, a technical meeting with DEQ to discuss this data and clarify the next steps in this process.

Irwin Hodson would like to work cooperatively with DEQ to cleanup and close this site in the VCP. Irwin Hodson is hopeful that the parties can move forward in a collaborative manner and in a way that is productive. As stated above, Irwin Hodson will submit a FS within the next ninety (90) days for DEQ review and approval. Irwin Hodson’s consultant will reach out to you directly to determine what changes from the existing work plan for indoor sampling is necessary. Please let me know if you have any questions whatsoever.

Sincerely,

TJ McDonald
The Irwin Hodson Company

Ec:

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Mark McDonald, IHCO
Lynn Green, EVRENORTHWEST
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