



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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October 7, 2024

Kyle Ferguson
Northwest Housing Alternatives
2316 SE Willard Street
Milwaukie, OR 97222

via electronic delivery (email)

**Re: DEQ Comments on the Independent Cleanup Pathway Final Report
Future Powellhurst Place Apartments
Portland, Oregon
ECSI# 6595**

Dear Kyle Ferguson:

The Oregon Department of Environmental Quality (DEQ) reviewed the *Independent Cleanup Pathway Final Report*¹ (ICP Report) submitted by EVREN Northwest, Inc. (ENW) on behalf of Northwest Housing Alternatives. The ICP Report was prepared for the Powellhurst Place Apartments property (the property) to provide the necessary information to support a No Further Action determination from DEQ.

Please revise and resubmit the ICP Report to address our comments below.

General Comments

- 1) The ICP Report must identify/evaluate the current and reasonably likely future beneficial water uses, consistent with DEQ's *Guidance for Conducting Beneficial Water Use Determinations at Environmental Clean Sites*².
- 2) The ICP Report appears to screen total lead data against background concentrations DEQ developed³ for the South Willamette Valley. DEQ recommends screening against background concentrations developed for the Portland Basin. The total lead background concentration for the Portland Basin is 79 mg/kg⁴.

Specific Comments

- 1) **Executive Summary.** The seventh paragraph states that laboratory analysis identified total lead in one of the four confirmation borings collected after site grading activities identified total lead above screening level risk-based concentrations (RBCs). DEQ requests that this paragraph clarify that total

¹ EVREN Northwest, Inc. 2024. Independent Cleanup Pathway Final Report, Future Powellhurst Place Apartments. Prepared for Northwest Housing Alternatives. October 2.

² DEQ. 1998. Guidance for Conducting Beneficial Water Use Determinations at Environmental Cleanup Sites, Environmental Cleanup Program. July 1. Updated November 2017.

³ DEQ. 2013. Development of Oregon Background Metals Concentrations in Soil, Land Quality Division Cleanup Program. March.

⁴ DEQ notes that anthropogenic sources likely influence the Portland basin total lead background concentration, and screening against the South Willamette Valley background concentrations may provide a conservative (albeit unnecessary) approach for removing the anthropogenic influences on Portland Basin background values.

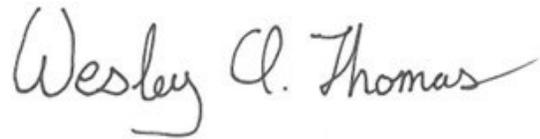
lead concentrations are below applicable background concentrations and residential direct contact RBCs.

- 2) **Section 2.5.1, Early Operations.** The second paragraph states that no information in the historical records indicated that the site was used for anything other than residential use. DEQ understands that past use possibly included automotive repair. Please clarify that previous property use was primarily residential but may have included commercial activities.
- 3) **Section 5.3, Phase II ESA (2021).** The second to last paragraph characterizes the leaching to groundwater pathway as “less likely to be complete.” If the groundwater beneficial use determination concludes that there are no known current or potential beneficial uses for groundwater at and near the property, DEQ recommends identifying the leaching to groundwater pathway as incomplete.
- 4) **Section 7.1.1, Land Use – Potential Receptors.** The second sentence states that the site is expected to remain “urban residential” for the foreseeable future. DEQ notes that we no longer distinguish between ‘urban residential’ and ‘residential’ use.
- 5) **Section 7.1.2, Pathways of Concern.** DEQ has the following comments:
 - a) Please revise the first potentially exposed population in Table 7-1 to state “Current/Future Resident and Occupational Worker.”
 - b) If supported by the groundwater beneficial use determination, DEQ recommends revising the leaching to groundwater pathway as incomplete. Refer to Specific Comment #3, above.
 - c) DEQ requests that the vapor pathway(s) be identified as ‘considered.’ Note that we generally agree that the vapor pathway is addressed based on the rationale provided in Section 7.4.
- 6) **Section 8.3, Further Discussion of Risk – Surface Soil.** DEQ recommends revising the first sentence of the second paragraph to state that site development involved excavation of surface soils, and that this excavation work likely removed most of the contamination identified in the Phase II ESA.
- 7) **Table 1 – Summary of Analytical Data, Soil.** Update the lead background concentration to 79 mg/kg.
- 8) **Figure 4, Conceptual Site Model (Human Health).** Please revise this figure to identify the following pathways as primary sources of exposure:
 - a) Subsurface soils direct contact exposure pathways for construction and excavation workers.
 - b) Subsurface soil volatilization to air pathway.
 - c) Groundwater pathways associated with current or potential future beneficial uses of groundwater, if any are identified.

Note that a complete pathway in Figure 4 does not imply unacceptable risk. Rather, complete pathways identify pathways that warrant further consideration for potential risk.

Please do not hesitate to contact me at (971) 263-8822 or Wesley.Thomas@deq.oregon.gov if you have any questions regarding this letter.

Sincerely,

A handwritten signature in black ink that reads "Wesley A. Thomas". The signature is written in a cursive style with a large initial 'W' and a long, sweeping underline.

Wesley A. Thomas, P.E.

Project Manager

NWR Cleanup Section

EC: Amanda Wozab, DEQ
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ECSI No. 6595 File