



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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September 6, 2024,

via electronic delivery

Heather Brown
Irwin Hodson Company
2838 SE 9th Avenue
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Subject: DEQ Follow-Up Comments to the Request for a Feasibility Study
Irwin Hodson Site
Portland, Oregon
ECSI # 6399

Heather Brown,

The Oregon Department of Environmental Quality (DEQ) has prepared this letter as a follow-up to our response to our August 27, 2024, letter to you. Specifically, this letter is intended to clarify statements in the August 27 letter about the threat to human health from the site. Irwin Hodson is currently conducting cleanup work under a voluntary cleanup agreement. DEQ first requested a Feasibility Study (FS) in our October 24, 2023, letter, in which we expressed concern that volatile organic compounds (VOCs), particularly trichloroethene (TCE), at concentrations above hot spot thresholds in sub-slab vapor following excavation activities to remove TCE-impacted soil.

Indoor air sampling results at the site to date have been below risk-based concentrations for TCE. However, the methods of sample collection observed by DEQ personnel during the January 2024 indoor air sampling event raise questions on the validity of the results. DEQ personnel observed broken windows proximal to samples from the warehouse space and significant air movement into the building, which may have resulted in the collection of a non-representative sample. These results would generally offer reasonable assurance that exposures to warehouse occupants under current conditions do not pose an immediate risk to building occupants.

Other contaminants, such as benzene, ethylbenzene, and naphthalene, have been detected above the Risk Based Concentration in indoor air both during pre-and post-removal action. Please explain these consistent exceedances in the FS.

Hot spot concentrations remain below the building, posing a potentially unacceptable future risk. DEQ requested the FS to treat hot spots to the extent feasible, consistent with Oregon Cleanup rules, to ensure protective conditions for a range of potential future conditions. Until the FS is approved and implemented, DEQ recommends quarterly indoor air sampling to verify indoor air remains acceptable. DEQ also recommends close coordination with DEQ in advance of and during sampling to ensure indoor air samples are collected in a consistent manner that provides confidence that the samples are representative of indoor air conditions. Submit a work plan for indoor air sampling for DEQ review and approval.

Please promptly confirm Irwin Hodson's intent to move forward cooperatively and provide a schedule for submitting the FS within 5 days of receiving this letter.

Sincerely,

Jim Orr

Jim Orr

NWR DEQ Project Manager

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