

Belmont Arco LLC  
2430 NE 163<sup>rd</sup> Ave  
Portland, OR 97230

Friday, October 18, 2024

**RE: Vapor Intrusion Pathway Investigation**  
**Belmont Auto Services**  
**3840 SE Belmont St**  
**Portland, Oregon 97214**

**Point Source Proposal OR220822-1C**

The following is a proposal to conduct a Vapor Intrusion Pathway Investigation at the above referenced property ("Site").

**BACKGROUND**

In August 2022 Point Source was engaged by Belmont Arco LLC to investigate the reported release of petroleum hydrocarbons to the subsurface identified as LUST ID #26-23-0326. Upon review, Point Source determined that the identified release was attributable to a past, conditionally closed release LUST ID #26-89-0067. This position was presented to the ODEQ and the assigned ODEQ Project Manager has subsequently agreed with this assessment. The ODEQ has requested that in order to close the new release under the prior LUST ID #26-23-0326, the property owner needs to evaluate soil gas conditions relative to vapor intrusion risk to the west adjoining residential property as well as to the Site building.

On behalf of Belmont ARCO LLC, Point Source performed the above-mentioned soil gas investigation which commenced on September 11, 2024. Based on the results of that investigation, the ODEQ has requested the following further actions be performed.

1. Inspect, provide descriptions, and take photos of the floor's conditions (cracks etc.).
2. Measure pressure differentials.
3. Collect multiple outdoor background samples.
4. Collect indoor air sample(s).
5. Collect 1-2 more sub-slab samples.
6. If possible collect samples when station/building is closed to limit outdoor air intake.

The following scope of work has been prepared to address the recommendations provided by the ODEQ.

**SCOPE OF WORK**

The following scope of work has been prepared to address the recommendations provided by the ODEQ:

- Measure pressure differentials within the Site building footprint to locate areas where positive pressure is most likely forcing sub slab vapors into the Site building.
- Inspect floor areas for cracks and breakthrough to the sub slab. Report conditions.
- Collect two sub slab soil gas vapor samples in two more locations to assess if there is a vapor intrusion risk to the Site building once areas with the greatest pressure differential have been determined.

- Collect two indoor and two outdoor ambient air samples to evaluate indoor air conditions in the Site building and establish background levels of contaminants of concern.

**Task 1 – Project Coordination**

Point Source will develop a site-specific health and safety plan for the proposed sampling activities and coordinate the efforts of subcontract services including analytical laboratory and geophysical survey services.

**Task 2 – Subsurface Investigation**

Point Source will complete the following activities:

- Point Source will direct a geophysical subcontractor to ensure proposed boring locations are free of underground utilities.
- Point Source will advance a 5/8-inch drill bit through the sub slab in approximately 6-8 locations within the footprint of the Site building and install Geoprobe Vapor Pin test ports. Based on manometer readings indicating where the areas of greatest pressure differential are located, as well as floor cracks identified during the slab condition evaluation, two of the Geoprobe test ports will be utilized for sub slab soil gas sampling locations.
- Two indoor and two outdoor (ambient) air samples will be deployed.

**Task 3 – Analytical Services**

Point Source will transport the samples to an ODEQ approved laboratory for sub-slab vapor and indoor/ambient sample analysis that will include volatile organic compounds by EPA Method TO-15.

**Task 4 – Reporting**

A report summarizing the scope of work, methodology, results, and conclusions/recommendations will be prepared by Point Source Solutions and delivered upon completion of the investigation. Analytical results for the submitted samples will be compared with the ODEQ vapor intrusion RBCs presented in the manual titled *“Risk-Based Decision Making for the Remediation of Contaminated Sites”* prepared by ODEQ revised March 2024.

The report will include a statement about whether the results represent a reporting requirement or remediation obligation.