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November 28, 2023
Project No. M2473.01.001

Kevin Dana
Project Manager
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232
Sent via email: kevin.dana@deq.oregon.gov

Re: Shortstack Belmont Data Evaluation, 2721-2731 SE Belmont Street, Portland, Oregon, ESCI Site ID#5731

Dear Kevin Dana:

Maul Foster & Alongi, Inc. (MFA) has prepared this data evaluation letter on behalf of Shortstack Belmont, LLC (Shortstack) for the Shortstack Belmont site located at 2721-2731 SE Belmont Street in Portland, Oregon (the Site).

Shortstack is preparing to commence demolition at the Site. Demolition will include removal of the existing structures and pavement followed by installation of erosion control best management practices and safety features (i.e., fencing). The Site will subsequently remain secure and inactive until construction begins in February 2024.

Given the recent changes in Oregon Department of Environmental Quality's (DEQ) contaminant volatilization pathway evaluation processes, we felt it prudent to reevaluate potential risks to workers at the Site and adjacent property residents during the period beginning at demolition completion and ending at active construction commencement. To that end, we reviewed historical Site soil and groundwater data and compared it to current DEQ risk-based concentrations (RBCs) for soil and groundwater volatilization to outdoor air. Historical analytical data are presented in the attached Tables 1 and 2 and shown on the attached Figure.

Contaminants were not detected in soil or groundwater samples at concentrations that exceed DEQ volatilization to outdoor air RBCs. Note also that the reported data were collected between 2005 and 2021 and therefore are expected to be greater than or equal to current site conditions. This data evaluation indicates there is not unacceptable risk to occupants of the Site or adjacent properties during the inactive period following Site demolition.

MFA seeks the DEQ's review of the data evaluation presented in this letter and concurrence of the approach and conclusions presented herein.

Sincerely,

Maul Foster & Alongi, Inc.

Ted Wall, PE
Principal Engineer

Krysta Krippaehne-Stein, EIT
Staff Engineer

Attachments

Limitations

Figure

Tables

cc: Heidi Nelson, Oregon Department of Environmental Quality

Anna Mackay, Sister-City

Jessy Ledesma, HomeWork Development

Jennifer Levy, Cascade Environmental Solutions

Limitations

The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

Figure

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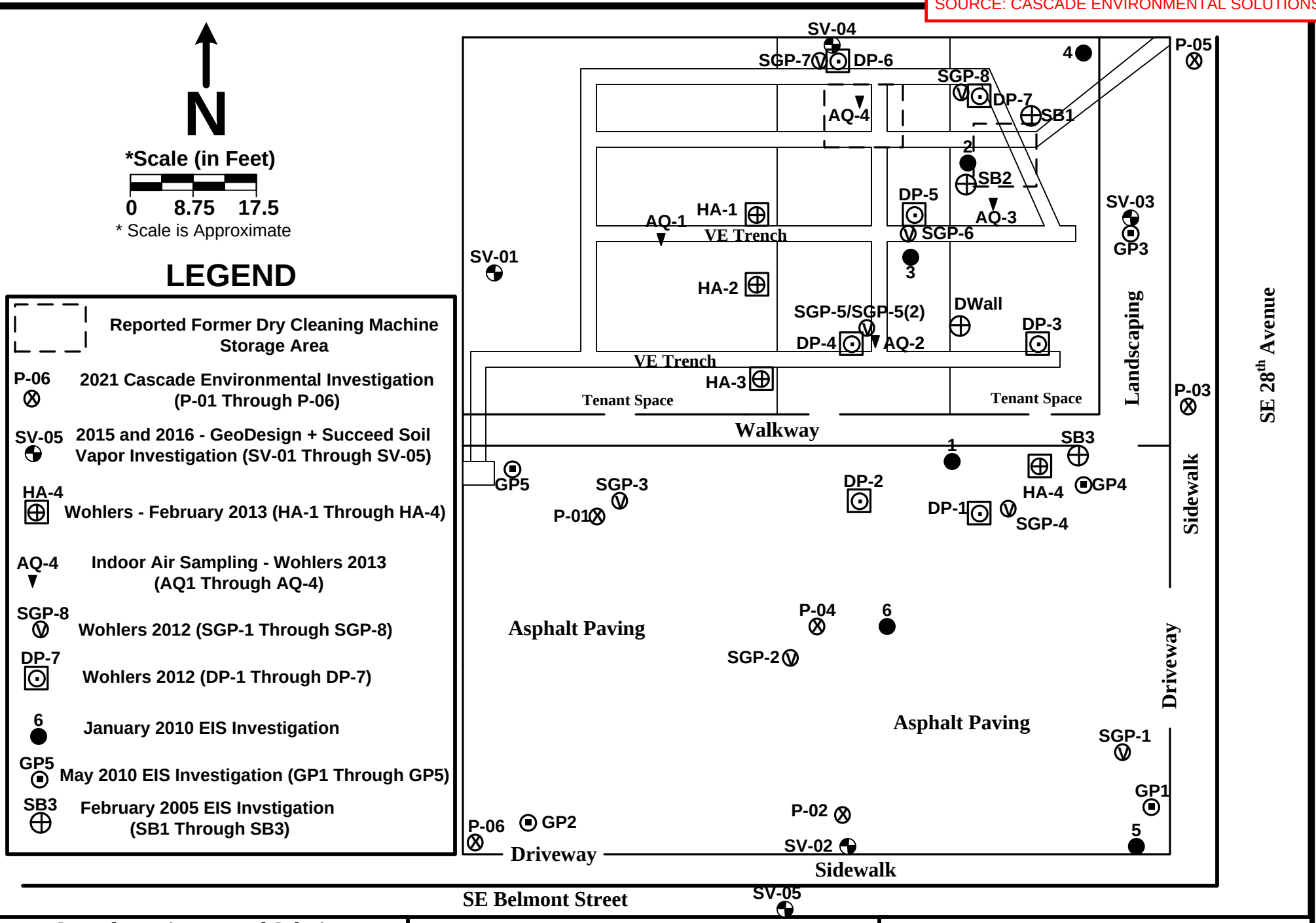
SOURCE: CASCADE ENVIRONMENTAL SOLUTIONS



Cascade Environmental Solutions PO Box 83294 8420 N. Ivanhoe Street Portland, Oregon 97203-4826	**FIGURE 3** SITE FEATURES MAP	COMMERCIAL PROPERTY 2721 – 2731 SE Belmont Street Portland, Oregon

Tables

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SOURCE: CASCADE ENVIRONMENTAL SOLUTIONS

TABLE 1
Soil Sample Analytical Results - Volatile Organic Compounds
Shortstack Belmont
Portland, Oregon

Soil Sample ID	Depth below ground surface	Date	Analyte (ppm) Benzene	Toluene	Ethylbenzene	Xylenes	Tetrachloroethene (PCE)	cis-1,2-Dichloroethene	trans-1,2-Dichloroethen	1,1-Dichloroethene	Vinyl Chloride
November 2, 2021 - Cascade Environmental Solutions											
P-01-5.5'	5.5'	11/2/2021	NA	NA	NA	NA	**613**	< 42.8	< 42.8	< 42.8	< 42.8
P-02-5.5'	5.5'	11/2/2021	NA	NA	NA	NA	**301**	< 35.5	< 35.5	< 35.5	< 35.5
P-03-5'	5'	11/2/2021	NA	NA	NA	NA	**140**	< 34.9	< 34.9	< 34.9	< 34.9
P-04-5.5'	5.5'	11/2/2021	NA	NA	NA	NA	**6,420**	< 75.5	< 75.5	< 75.5	< 75.5
P-04-21'	21'	11/2/2021	NA	NA	NA	NA	**298**	< 38.2	< 38.2	< 38.2	< 38.2
P-05-5'	5'	11/2/2021	NA	NA	NA	NA	< 41.7	< 41.7	< 41.7	< 41.7	< 41.7
P-06-5.5'	5.5'	11/2/2021	NA	NA	NA	NA	< 36.9	< 36.9	< 36.9	< 36.9	< 36.9
June 22, 2010 Investigation- Environmental Inspection Services											
GP1- 25'	25'	6/22/2010	< 10	< 10	< 10	< 10	**66.5**	**19.7**	< 10	< 10	< 10
GP2 -22'	22'	6/22/2010	NA	NA	NA	NA	< 10	NA	NA	NA	NA
GP3- 25'	25'	6/22/2010	NA	NA	NA	NA	< 10	NA	NA	NA	NA
GP4- 20'	20'	6/22/2010	NA	NA	NA	NA	ND	ND	NA	NA	NA
GP5- 25'	25'	6/22/2010	< 10	< 10	< 10	< 10	**76**	< 10	< 10	< 10	< 10
June 22, 2010 Investigation- Environmental Inspection Services											
GP1- 25'		6/22/2010	< 10	< 10	< 10	< 10	**66.5**	**19.7**	< 10	< 10	< 10
GP2 -22'		6/22/2010	NA	NA	NA	NA	< 10	NA	NA	NA	NA
GP3- 25'		6/22/2010	NA	NA	NA	NA	< 10	NA	NA	NA	NA
GP4- 20'		6/22/2010	NA	NA	NA	NA	ND	ND	NA	NA	NA
GP5- 25'		6/22/2010	< 10	< 10	< 10	< 10	**76**	< 10	< 10	< 10	< 10
May 28, 2010 Investigation - Environmental Inspection Services											
GP1- 10'		5/27/2010	NA	NA	NA	NA	< 10	NA	NA	NA	NA
GP2- 10'		5/27/2010	NA	NA	NA	NA	< 10	NA	NA	NA	NA
GP3- 30'		5/27/2010	NA	NA	NA	NA	**656**	NA	NA	NA	NA
GP4- 5'		5/27/2010	NA	NA	NA	NA	< 10	NA	NA	NA	NA
GP4- 10'		5/27/2010	NA	NA	NA	NA	< 10	NA	NA	NA	NA
January 29. 2010 Investigation- Environmental Inspection Services											
3' Demising Wall		1/29/2010	NA	NA	NA	NA	< 10.0	NA	NA	NA	NA
3' NE Bldg Corner		1/29/2010	NA	NA	NA	NA	**14.1**	NA	NA	NA	NA
3' NE Bldg Cor 4 1/2' SB 1 (PL)		1/29/2010	NA	NA	NA	NA	< 10.0	NA	NA	NA	NA
February 2, 2005 Investigation - Environmental Inspection Services											
SB1	Interior	2/2/2005	< 0.02	< 0.1	< 0.1	< 0.1	**0.1**	NA	NA	NA	< .02
SB2	Bottom	2/2/2005	< 0.02	< 0.1	< 0.1	< 0.1	**0.3**	NA	NA	NA	< .02
SB3	Parking Lot	2/2/2005	< 0.02	< 0.1	< 0.1	< 0.1	**12.4**	NA	NA	NA	< .02
Risk-Based Concentrations for Generic Soil Pathways (mg/L) - Occupational											
RBCso - Volatilization to Outdoor Air			340	160	24,000	>Csat	>Csat	> Max	> Max	>Sat	6.5
RBCso - Volatilization to Outdoor Air (June 2023 RBCs)			50	>Csat	160	>Csat	>Csat	>Max	>Max	>Csat	89
Risk-Based Concentrations for Generic Soil Pathways (mg/L) - Urban Residential											
RBCso - Volatilization to Outdoor Air			27	85	>Csat	>Csat	>Csat	> Max	> Max	>Sat	89
RBCso - Volatilization to Outdoor Air (June 2023 RBCs)			27	>Csat	85	>Csat	>Csat	>Max	>Max	>Csat	6.5
Risk-Based Concentrations for Generic Soil Pathways (mg/L) - Residential											
RBCso - Volatilization to Outdoor Air (June 2023 RBCs)			11	>Csat	36	>Csat	>Csat	>Max	>Max	>Csat	5.3
Notes:											

Bold indicates analyte was detected
mg/L = micrograms per liter; ppm = parts per million.
NA = Not Analyzed
< = Analyte NOT DETECTED at or above the reporting limit.
RBCso - Volatilization to Outdoor Air
>Csat = The soil RBC exceeds the limit of 3-phase equillibrium partitioning. Soil concentrations in excess of Csat indicate that free product might be present.
>Max = The constituent RBC for this pathway is calculated as greater than 1,000,000 mg/L. Therefore, this substance is deemed not to pose risks in this scenario.

SOURCE: CASCADE ENVIRONMENTAL SOLUTIONS

TABLE 2
Groundwater Sample Results - Volatile Organic Compounds
Shortstack Belmont
Portland, Oregon

Sample I.D.	Date	VOCs via Method 8260 D (ug/L)									
		Benzene	Ethyl-benzene	Toluene	Xylene	Tetrachloroethene (PCE)	trans-1,2-Dichloroethene	Trichloroethene	EDB (1,2-dibromoethane)	EDC (1,2-dichloroethane)	cis-1,2-Dichloroethene
November 2, 2021 Investigation- Environmental Inspection Services											
P-04-GW	11/2/2021	NA	NA	NA	NA	**623**	< 4.00	< 4.00	< 5.00	< 4.00	< 4.00
P-06-GW	11/2/2021	NA	NA	NA	NA	**178**	**0.481**	**5.04**	< 0.500	< 0.400	**1.56**
May 20, 2010 Investigation- Environmental Inspection Services											
GP1- 23'	5/20/2010	< 0.3	< 1.0	< 1.0	< 1.0	**661**	**1.14**	**46.9**	< 1.0	< 1.0	**178**
GP2- 23'	5/20/2010	< 0.3	< 1.0	< 1.0	< 1.0	**1.83**	< 1.0	< 1.0	**3.88**	**2.39**	**1.12**
GP3- 23'	5/20/2010	< 0.3	< 1.0	< 1.0	< 1.0	**4.46**	< 1.0	< 1.0	**5.1**	**2.12**	< 1.0
GP5- 23'	5/20/2010	< 0.3	< 1.0	< 1.0	< 1.0	**364**	< 1.0	**1.21**	< 1.0	< 1.0	< 1.0
Risk-Based Concentrations for Groundwater Pathways (ug/L) - Occupational											
RBCwo - Volatilization to Outdoor Air		2,800	8,200	DNE	DNE	150,000	>S	6,900	430	4,900	>S
RBCwo - Volatilization to Outdoor Air (June 2023)		14,000	43,000	>S	>S	>S	>S	20,000	790	9,000	>S
Risk-Based Concentrations for Groundwater Pathways (ug/L) - Urban Residential											
RBCwo - Volatilization to Outdoor Air		7,400	23,000	>S	>S	>S	>S	20,000	790	9,000	>S
RBCwo - Volatilization to Outdoor Air (June 2023)		7,400	23,000	>S	>S	150,000	>S	6,900	430	4,900	>S
Risk-Based Concentrations for Groundwater Pathways (ug/L) - Residential											
RBCwo - Volatilization to Outdoor Air (June 2023)		3,100	9,900	>S	>S	64,000	>S	3,300	180	2,100	>S
Notes:											

Bold indicates analyte was detected
DNE = generic risk-based concentrations (RBCs) Do Not Exist for this constiuent
< = Analyte NOT DETECTED at or above the reporting limit.
RBCwo - Volatilization to Outdoor Air
>S This groundwater RBC exceeds the solubility limit.
µg/L = micrograms per liter