

**From:** [ELAYER Tina \\* DEQ](#)  
**To:** [rick.](#)  
**Subject:** RE: ECSI 6573 - Additional SI Request- Draft SAP Comments  
**Date:** Monday, March 25, 2024 9:48:00 AM  
**Attachments:** [image001.png](#)  
[2024-03-15 ECSI6573 SAP TE.pdf](#)

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Good morning,

Lead worker reviewed the draft SAP and had the following comments.

I'm attaching the draft SAP with my comments and highlighted areas where lead worker refers to their comments in this email.

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#### Well Sampling

- JOSE 16053 Sampling (on-site well).
  - Based on the well log, this well is cased from 0-72 feet with an open bottom and no perforations or screens. all groundwater enters from 72 ft. bgs. DEQ requests that when sampling, the bailer be lowered to the bottom of the well slowly to avoid agitation and retrieved.
    - A weighted bailer will likely be needed for this, or non-reactive weights used.
  - The SAP mentions "a" 40 mL VOA vial for sampling. We assume there will be more than one since labs typically want at least two vials for each sample.
- 208 Macnew Lane Well.
  - The hose used for purging should be removed prior to collecting the sample. The sample should be collected directly from spigot with low flow to avoid turbulence. No need to use special hose for purging with way either.
- Quality Control: The trip blank should also be analyzed for VOCs. Alternatively, the trip blank could be held at the lab, and only analyzed if there are detections of contaminants of concern in the VOC sample.
  - However, using the hold method, you will need to be careful that laboratory/method hold times are met, to avoid analyzing samples out of hold time.

#### Soil Gas Sampling

- DEQ is concerned about using this hydrated bentonite method and pushing the probe through it. Our concern is about the adequacy of the seal after the rod is pushed through it, and possible fouling of the tube and problems with the clay and the expendable point. We suggest using VOC-free clay or putty (could include a bentonite "putty" mixed on site) to seal the annulus after the rod is inserted through the slab. See EPA Soil Gas Sampling procedure, Section 5 <https://www.epa.gov/sites/default/files/2015-06/documents/Soil-Gas-Sampling.pdf>.
- Leak check procedure: This leak check using 2-propanol doesn't make sense to us. While 2-propanol can be used as a leak check, typically when it is used, the soil gas sample is tested for VOCs, including 2-propanol. There are acceptable levels of leakage. The problem with doing it this way is that if you have a leak, you won't know it until you get your lab data back, and then will be too late. The shroud method usually involves helium gas, and air is drawn through the sample train and a helium detector is used to check and make sure that there is no detectable helium in the sample train prior to sample collection. If leaks are detected, the sample train can be inspected and fixed before sampling. We are not sure of how you could do this using

2-propanol as the leak check gas. See EPA procedure linked to above for more information.

- **Quality Control:** It seems that collecting a sample of air from the shroud with 2-propanol will result in a very high detection of the leak check gas and won't tell you if any leaked into the sample train. See Section 6.3 of the above referenced guidance regarding leak check with helium. When using 2-propanol, we are not aware of a way to test air from the sample train for leaks, like with a helium detector. We suggest using the helium shroud/detector method as prescribed, or may use 2-propanol for leak check, and the leak check results would be part of the lab report for the sub slab sample. The helium method is preferred and reduces risks of large leaks that could negate sample results. We would be happy to discuss this more if you like.

**Next Step:** Please respond to our comments and indicate how you will revise your sampling approaches.

Thank you,  
Tina

**Tina Elayer**

Cleanup Project Manager

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**From:** ELAYER Tina \* DEQ <Tina.ELAYER@deq.oregon.gov>

**Sent:** Friday, March 15, 2024 3:06 PM

**To:** rick . <rick@emcengineersscientists.com>

**Subject:** RE: ECSI 6573 - Additional SI Request

Thanks Rick, will work on expediting the SAP review.

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**From:** rick . <[rick@emcengineersscientists.com](mailto:rick@emcengineersscientists.com)>

**Sent:** Friday, March 15, 2024 3:03 PM

**To:** ELAYER Tina \* DEQ <[Tina.ELAYER@deq.oregon.gov](mailto:Tina.ELAYER@deq.oregon.gov)>

**Subject:** Re: ECSI 6573 - Additional SI Request

I haven't scheduled it yet. It will take at least a week to get air sampling equipment and arrange to prepay the well contractor. I'm thinking 2-3 weeks until I sample.

Rick Gates  
EMC-Engineers/Scientists, LLC

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[www.emcengineersscientists.com](http://www.emcengineersscientists.com)

On Friday, March 15, 2024 at 11:18:23 AM PDT, ELAYER Tina \* DEQ <[tina.elayer@deq.oregon.gov](mailto:tina.elayer@deq.oregon.gov)> wrote:

Good afternoon,

SAP received. Will review on Monday 3/18/24 and then route it to the lead worker for final review.

When are you planning on conducting the field work?

Thanks,

Tina

**Tina Elayer**

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**From:** rick . <[rick@emcengineersscientists.com](mailto:rick@emcengineersscientists.com)>

**Sent:** Friday, March 15, 2024 10:58 AM

**To:** ELAYER Tina \* DEQ <[Tina.ELAYER@deq.oregon.gov](mailto:Tina.ELAYER@deq.oregon.gov)>

**Cc:** Jack Akin <[emc@emcengineersscientists.com](mailto:emc@emcengineersscientists.com)>

**Subject:** Re: ECSI 6573 - Additional SI Request

Attached is the Sampling and Analysis Plan for additional investigation of Jerry's Clutch and Transmission (Former). Let me know if you need additional information.

Rick Gates

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On Friday, March 8, 2024 at 03:12:45 PM PST, ELAYER Tina \* DEQ <[tina.elayer@deq.oregon.gov](mailto:tina.elayer@deq.oregon.gov)> wrote:

Hi Rick,

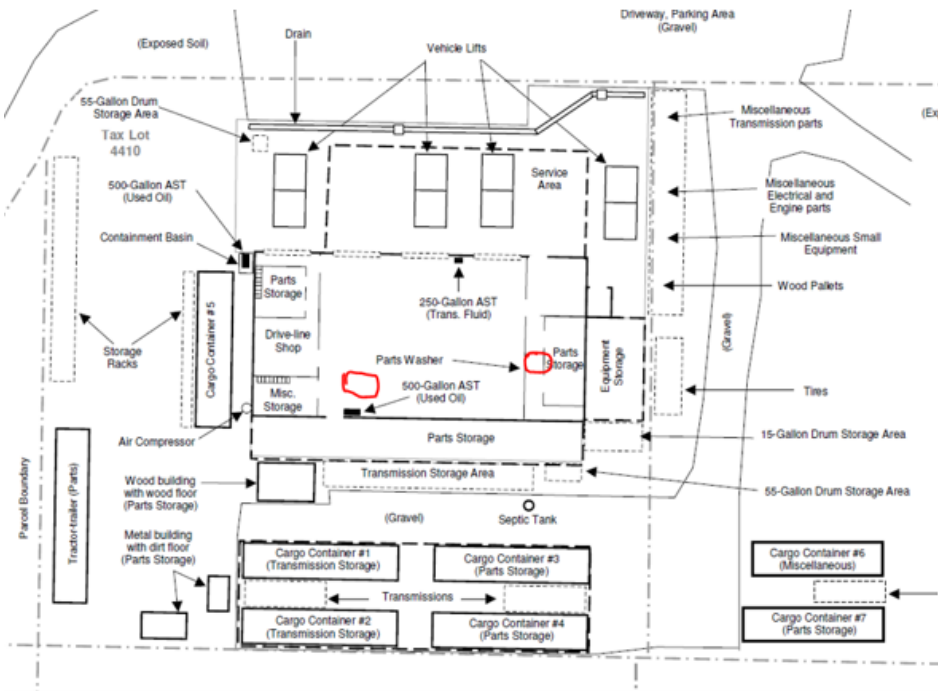
Thanks for the calls as we work on addressing data gaps. After discussing with Don Hanson (lead worker) we would like to see more details regarding the procedures sampling the on-site domestic well, neighboring property domestic well, and sub-slab soil vapor sampling in the building. I understand the soil vapor sampling is a new request. We've provided our rationale for this request below.

#### Soil Vapor Sampling

The site has been an auto repair facility for about 50 years. Before that it reportedly was an auto body shop. Both kinds of facilities are known to have used degreasers/solvents as part of their work. This could include petroleum or chlorinated solvents, and solvents used in the automotive painting processes (thinners/cleaners). Recently, "safe" solvents may be used. These "safe" or "green" solvents were not available in the 1970s and 1980s. Also, historical solvent recycling and management is a concern. Past practices at similar sites have included disposing of spent solvents on the ground or in the septic system. This concern is heightened due to the fact that residential use of the property is a reasonably likely future land use. So, a home could be built over the former shop and facilities.

It is often difficult to locate sources of solvent releases/spills using soil sampling. Soil vapor sampling would allow us to know if there are significant issues with VOCs in the subsurface (soil, or groundwater). It would also (hopefully) provide DEQ confidence that there is not a significant concern for vapor intrusion in the vicinity of the shop.

We suggest two locations (red circles) where data from soil vapor sampling would help us see if there is a risk, figure below:



Soil vapor samples should be analyzed for VOCs by Modified EPA Method TO-15. No duplicate required. The results will need to be compared to our recently updated vapor intrusion screening levels (VISLs). If these areas are covered by concrete slab, then sub-slab soil vapor samples could be collected. If there is no slab, then soil gas samples should be collected from approximately 5 feet bgs.

<https://www.oregon.gov/deq/Hazards-and-Cleanup/env-cleanup/pages/risk-based-decision-making.aspx>

Domestic water well sampling:

On-site well-

We are fine with you using Quinn's Well Drilling service to place a pump in the well and purge the GW before sampling. You wanted to use a splitter for collecting the samples, instead of a p-pump because of potential low-flow issues.

We don't approve of collecting the sample from the on-site well during purging by Quinn's. The pumping rate is too high, and the sample will likely be aerated, and volatiles lost.

We would also prefer that you pump the GW for a 1/2 hour and then let the GW recover for about an hour, and then collect the sample using a p-pump at a low flow or with a disposable bailer with a low flow emptying device, to avoid agitation of the water and loss of volatiles.

Please provide your rationale in the work plan.

Neighboring domestic well-

Water should be run from the well for approximately 15 minutes. The flow from the spigot should be reduced for sample collection to avoid agitation when filling sample containers.

The GW sampling analysis plan you originally proposed is good, but we'd like to see TPH-Gx as well. Don said we don't need metals analyzed.

Diesel range petroleum (TPH-Dx), volatile organic compounds (VOCs) by EPA Method 8260, and polyaromatic hydrocarbons (PAHs) by EPA Method 8270.

Please collect one duplicate collected from the on-site well – VOCs only.

Since these are domestic wells you can let the water run on the ground. Sorry about that, was thinking about monitoring wells.

Please provide a brief work plan explaining how you intend to conduct the soil vapor and water sampling.

This could be in email format if you like.

Once we have a work plan to review and comment on, we will have a better idea of what is needed to address the data gaps. The results of this additional work should allow us to determine if we can proceed toward site closure, or address data gaps that may arise from the sampling results.

I'm looking forward to addressing those data gaps and working towards site closure. We may need to get on a call with Don after you submit the work plan and we provide our comments.

If you have questions, please contact me on Monday... over on my hours and am leaving for the rest of the day.

Regards,

Tina

**Tina Elayer**

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