



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

April XX, 2025

John Kingery
Chinook Investment Company
PO Box 25158
Portland, OR 97298-0158

sent via e-mail

DRAFT FOR PUBLIC COMMENT

RE: Conditional No Further Action Determination
Springdale Cleaners
6337 SW Capitol Highway
Portland, Oregon
ECSI #2290

Dear John:

The Oregon Department of Environmental Quality (DEQ) reviewed the available information for the above referenced property (the "Site"), including an October 8, 2024, report entitled *Performance Monitoring Report, Third Quarter 2024*, prepared by EVREN Northwest. The Site property is designated State ID 1S1E16CD -1300 in Multnomah County records.

DEQ has determined that remedial action to address environmental contamination at the Site is complete, and no further action is required, with conditions. This determination is a result of our evaluation and judgment based on the DEQ regulations and the facts as we now understand them including, but not limited to the following:

- The Site property covers about 1 acre and contains two buildings, a northern building about 4,000 square feet ("North Building") and a larger building about 10,500 square feet ("Large Building"). Springdale Cleaners occupies a tenant space in the middle portion of the Large Building. The North Building is located upgradient of the Large Building and associated release areas.
- The building on adjacent property to the west ("West Building") is located at street addresses of 6349-6359 SW Capitol Highway on the tax lot designated as State ID 1S1E16CD 1700 in Multnomah County records ("Adjacent Property"). The Adjacent Property and West Building have been impacted by environmental releases from the dry-cleaning operation. The West Building is separated from the Large Building by a 20-foot-wide grass strip of land.
- The Site area was largely residential prior to 1962, when the Large Building was constructed. Dry cleaning operations using tetrachloroethene, also known as perchloroethene and abbreviated as "PCE", were conducted from that time until 2008, when the dry cleaner switched to a petroleum-based solvent.
- The cause of the contamination appears related to leaks from a sanitary sewer line within and beneath the utility corridor that begins under the dry cleaner and runs to the south beneath the west edge of the Large Building. The release point is near the north end of the corridor (northwest portion of the Large Building). The contamination migrated to shallow groundwater located at a depth of about 12 feet. Vertical and lateral migration was limited by fine-grained soil. Clayey soil at about 20 feet below ground surface bounds the lower shallow groundwater zone. The most concentrated part of the plume is contained between the Large Building and the West Building at a depth of about 10- 20 feet.

- Residual concentrations of PCE and related compounds such as trichloroethene (TCE) are present in groundwater, soil and soil gas in this area. Prior to remedial actions, indoor air was impacted above DEQ risk-based screening concentrations in both the Large Building and West Building.
- Using Dry Cleaner Program funding, DEQ's contractor completed a series of five groundwater treatment events involving injection of treatment fluids between 1999 and 2022. In 2010, DEQ's contractor installed a vapor collection system in the Site building to improve ventilation in the utility corridor and intercept vapors before they migrated into the Large Building. In 2012, the system piping was extended beneath two tenant spaces in the West Building. Periodic monitoring events showed substantial decreases in the magnitude and extent of contamination in groundwater as a result of the treatment events, and that the vapor mitigation system adequately controlled vapor intrusion into the affected buildings when the system was operating.
- DEQ replaced the vapor collection system blower, condensate collector, and electrical control box in October 2023. The DEQ Dry Cleaner Program ended funding on January 1, 2024. The Site owner agreed to operate and maintain the system and complete air monitoring in the West Building on the Adjacent Property to ensure that the vapor collection system was operating effectively. Given prior sampling results in the Large Building, which were consistently below applicable risk-based concentrations, additional testing was not required for it. Between March and September 2024, the Site owner completed three rounds of vapor testing in the West Building to assess seasonal variation in vapor intrusion conditions per a March 7, 2024, DEQ-approved IRAM Performance Monitoring Work Plan. All dry-cleaning related chemicals were detected below applicable DEQ March 2024 risk-based concentrations for occupational exposure.
- Residual contamination remains in soil and shallow groundwater beneath the utility corridor and grassy strip located between the Large Building and West Building. This contamination will continue to be a source to soil vapor and potentially indoor air and will need to be addressed through continued operation of the existing vapor collection system until DEQ determines that is no longer necessary.
- The Site is zoned Commercial Mixed Use 2 (CM2) by the City of Portland and is currently utilized for commercial/retail purposes. Residential use also is allowed under this zoning. An apartment complex is located on adjacent property to the northwest of the Site. The Site is largely covered with hardscape and small landscaped areas. The grassy strip between the buildings is commonly used by tenants and provides minimal habitat; therefore, a formal ecological risk screening was not needed.
- Potable water for the Site is provided by the City of Portland. The Oregon Water Resources Department database lists only two water supply wells in Section 16 of Township 1 North, Range 3 East. It is unlikely that supply wells will be installed on Site property in the future. Because dry cleaning solvent impacts to groundwater are localized in shallow groundwater, Site contamination has not affected beneficial groundwater use.
- Inhalation of indoor air is the only currently complete human health exposure pathway. Indoor air testing has demonstrated that with the vapor collection system operating conditions are protective for commercial/retail use in both the Site buildings and West Building. However, TCE was detected above the risk-based screening concentration for residential use in each tenant space sampled in the West Building. Similarly, results from the Large Building show TCE concentrations occasionally exceeded residential risk-based concentration. Direct contact by excavation or construction workers with contaminated soil or shallow groundwater is possible during future intrusive activities below or adjacent to the utility corridor.
- DEQ held a public comment period in March 2025 to announce its proposal to issue a conditional no further action determination. In addition, DEQ has maintained contact with the owner of the adjacent property ("Adjacent Property Owner") regarding environmental conditions on their

property and reached out directly to them with the current proposal. **UPDATE FOLLOWING PUBLIC COMMENT**

- As a condition of the proposed Conditional No Further Action, DEQ requires, and the Site owner agrees, to continue operation and maintenance of the vapor mitigation system in accordance with the Vapor Collection System Operation Manual provided by DEQ and dated January 26, 2024. This will require the Site Owner to coordinate with the Adjacent Property Owner to seek access to the adjacent property and, as long as access is granted, take steps within Owner's control to ensure that the subsurface vapor collection piping crossing the grassy strip and extending beneath two tenant spaces in the western building is not disturbed. Owner will notify DEQ if the Adjacent Property owner denies the Site Owner's access to the Adjacent Property for these purposes or if the Adjacent Property owner disturbs the existing vapor collection system. Should the Site be redeveloped, or if the existing Large Building on the Site is replaced with a new structure, or existing tenant spaces within the Large Building are further divided or combined, or the Large Building is converted to residential use, Site owner agrees to conduct a vapor assessment approved by DEQ. This requirement does not apply to remodeling activities in the Large Building that do not constitute replacement of the existing building and do not further divide or combine the existing tenant spaces. If applicable DEQ indoor air RBCs are exceeded, additional cleanup or mitigation actions, as warranted, will be completed by Site owner at their expense prior to occupancy to ensure conditions are safe for the intended use. For purposes of this document, the term redevelopment means replacement of all existing structures and improvements on the Site with new buildings and improvements.
- Future soil-disturbing activities shall be conducted per the DEQ-approved contaminated media management plan dated February 10, 2025.
- Since ongoing ground water monitoring is no longer necessary, DEQ has agreed to properly decommission all Site-related groundwater monitoring wells installed by DEQ.

These controls and restrictions ensure long-term protection of human health and the environment and are memorialized in an easement and equitable servitudes recorded on the Site property deed on **(to be determined)**.

Based on the available information, conditions at the Site are currently protective of public health and the environment in accordance with Oregon environmental cleanup law, ORS 465.200 et seq. and Oregon Administrative Rules 340-122-0205 through 340-122-0360. The Site requires no further action unless new or previously undisclosed information becomes available, or there are changes in site development or land and water uses, or more contamination is discovered. DEQ has updated the [Springdale Cleaners Public File](#) to reflect this decision.

Site information and reports supporting this No Further Action decision can be viewed at: [Springdale Cleaners web documents](#). DEQ recommends keeping a copy of all DEQ documentation with the permanent facility records. If you have any questions, please contact Mark Pugh at (503) 229-5587 or mark.pugh@deq.oregon.gov.

Sincerely,

Kevin Parrett, Manager
Northwest Region Cleanup Program

No Further Action Determination

Springdale Cleaners

ECSI 2290

Page 4 of 4

e-copy: Lynn Green, EVREN Northwest
 Geoffrey Tichenor, Steel Rives