



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

Northwest Region Portland Office

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August 15, 2024

Kendra J. Williams  
Soil Solutions Environmental Services, Inc  
3540 Southeast 28<sup>th</sup> Avenue  
Portland, Oregon 97202

**Re: DEQ Comments on *Aboveground Storage Tank Progress Report***  
Wooded Hills Dr. Residence (ECSI 6564)  
19251 SE Wooded Hills Drive, Damascus, Oregon 97089

Dear Kendra Williams:

Department of Environmental Quality (DEQ) has reviewed the document titled *Aboveground Storage Tank Progress Report* (report) submitted by Soil Solutions Environmental Services, Incorporated (Soil Solutions) on August 7, 2024, for the Wooded Hills Dr. Residence property located at 19251 Southeast Wooded Hills Drive in Damascus, Oregon (site). DEQ comments on the report are provided below.

### General Comments

- 1) DEQ appreciates that sub-slab soil gas samples that have been collected at the site to date. However, due to the presence of diesel at a concentration greater than the risk-based concentration for soil gas vapor intrusion into residential buildings in the November 2023 sample, additional sub-slab soil vapor samples should be collected to confirm that vapor intrusion does not present a risk to the occupants of the residence.

### Specific Comments

- 2) Section 2.0 Site Description – Please confirm whether the sink was flushed prior to collecting the drinking water sample. If the sink was flushed, how long was the system flushed prior to sample collection?
- 3) Section 2.0 Site Description – Please include a description and a figure showing the general configuration of the basement to provide context regarding where the sub-slab soil gas samples were collected, including in relation to the depressurization system. The description should include the condition of the basement flooring and how far the basement extends below the tank pad.
- 4) Section 3.0 Field Activities – This section states that “depths are measured from ground surface at the tank”; however, the depths of some soil samples (e.g., S19 and S20) do not appear to be measured from the ground surface at the tank. Please revise the text as needed to accurately describe sample depth.

- 5) Section 3.0 Field Activities – Please provide more information about how the soil gas samples were collected. What was the flow rate during sampling? How was the 2-propanol administered for leak detection?
- 6) Section 3.2 Site Assessment Activities – Please include the approximate dimensions of the January and February 2023 excavations.
- 7) Section 5.2 Ecological Receptors –Include the approximate depth at which contaminated soil remains beneath the former above ground heating oil tank.
- 8) Section 6.0 Summary, Discussion, and Conclusions – The report states that diesel and heavy oil contamination remain “at a depth of 3 feet bgs”. Sample S15@6” provides vertical delineation; therefore, the depth range for the residual soil contamination should be included.
- 9) Section 6.0 Summary, Discussion, and Conclusions – The last bullet in the section states that “the second soil gas sampling was collected approximately 3.5 months later, during which time the sub-slab depressurization system was running.” Please make it clear that the system was not running during sample collection.
- 10) Figure 2: Site Map – The figure should include the locations of the on-site well and depressurization system.

DEQ requests the report be revised to address DEQ’s comments. Please contact me by phone (503) 926-2257 or email ([rebecca.digiustino@deq.oregon.gov](mailto:rebecca.digiustino@deq.oregon.gov)) if you have questions.

Sincerely,



Rebecca Digiustino  
Project Manager  
Northwest Region Cleanup Program

cc: ECSI File No. 6564