Oregon
Kate Brown, Governor

Department of Environmental Quality
Northwest Region
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5263
FAX (503) 229-6945
TTY 711

September 1, 2021

Michael Duet
RPS Group, Inc.
135 S. LaSalle St., Suite 3500
Chicago, IL 60603

RE: Further Action Required
for Diesel Cast West in Portland
ECSI #6453

Michael Duet:

The Oregon Department of Environmental Quality (DEQ) has completed its review of the *Independent Cleanup Pathway Final Report* prepared by RPS Group, Inc. on May 20, 2021 for the Diesel Cast West site, located at 8100 NE 14th Place in Portland, Oregon.

DEQ understands that the site has been used for the manufacturing, repair, and refurbishment of new and aftermarket components for heavy duty diesel engines since 1963. RPS advanced five borings around the site in June 2020 as part of a limited Phase II Environmental Site Assessment. Soil samples were collected from three of the borings and analyzed for metals, polycyclic aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs). Only metals were detected in the soils, at concentrations consistent with naturally-occurring background levels.

Groundwater was encountered 13 feet below ground surface (bgs). Groundwater samples were collected from all five borings and analyzed for dissolved metals, PAHs, and VOCs. Relatively high concentrations of dissolved arsenic and dissolved lead were detected in a boring near the northwest corner of the site.

Nine soil borings were subsequently advanced in the northwest corner of the site in October 2020, and five groundwater monitoring wells were installed along the north and west edges of the site. Soil samples from the borings and groundwater samples from the monitoring wells were analyzed for arsenic and lead. Average concentrations of arsenic and lead in the soils were generally consistent with background. Concentrations of arsenic and lead in the groundwater exceeded DEQ's risk-based concentrations (RBCs) for ingestion, but no drinking water wells are in the immediate vicinity of the site.

RPS also collected five sub-slab soil gas samples, three indoor air samples, and one outdoor air sample, all of which were analyzed for VOCs. A wide variety of contaminants, including petroleum-related VOCs, chlorinated solvents, and refrigerants, were detected in the sub-slab and indoor air samples. However, the sub-slab sample concentrations were below DEQ's occupational vapor intrusion RBCs, and RPS attributed the indoor detections to indoor sources.

DEQ recognizes that additional information on the potential nature and extent of contamination at the Diesel Cast West site may have been presented in the Phase I Environmental Site Assessment (which DEQ does not have a copy of). However, the sampling conducted for the *Independent Cleanup Pathway Final Report* appears insufficient to characterize the concerns at the site, for the following reasons:

- Soil samples from only three locations were analyzed for contaminants of interest. This is insufficient, given that the three locations were on the far edges of the site and in general were not located in areas where contamination is likely to be present based on historic site activities. In addition, it was not explained why petroleum hydrocarbons (in particular diesel-range hydrocarbons) were not included as contaminants of interest.
- Groundwater from the monitoring wells should be sampled for all contaminants of interest (including petroleum hydrocarbons) for at least two quarters, and the groundwater flow direction should be recorded.
- A wide variety of VOCs were detected in the sub-slab vapor samples, but the sources of the contamination were not identified. In addition, the locations of the sub-slab and indoor air samples were not shown on the Figures in the report.
- The municipal stormwater system in the area discharges through outfalls to the Columbia Slough (ECSI #1283), so stormwater from the site (along with groundwater contamination) may be impacting Slough sediments. A Source Control Evaluation is needed to determine the potential impacts (from both stormwater and groundwater contamination) to the Slough.
- The baseline ecological risk assessment only evaluated the site and the nearest adjacent properties. The assessment radius should extend ¼ mile from the site, which would include the Columbia Slough and a small wetland area southwest of the site. Ecological receptors may be impacted through the stormwater and groundwater-to-surface-water contaminant migration pathways.

Please provide DEQ with additional information on the nature and extent of contamination at the Diesel Cast West site, and an evaluation of the risks to human health and the environment from the contamination. I can be reached at (503) 229-5369 or by e-mail at kevin.dana@deq.state.or.us if you have any questions or concerns about this letter. DEQ appreciates your efforts in investigating the contamination and evaluating the potential concerns at this site.

Sincerely,

Kevin Dana

Kevin Dana, Project Manager
Northwest Region Cleanup Program

cc: Gary Hales, Diesel Cast West
ECSI #6453 File