



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

Northwest Region

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February 19, 2025,

*via electronic delivery*

Anne Shaha  
Asgard LLC  
Portland, Oregon 97202

Subject: DEQ Comments on the Feasibility Study  
Gerber Legendary Blades Site  
Portland, Oregon  
ECSI # 0118

Anne Shaha,

The Oregon Department of Environmental Quality (DEQ) has prepared this letter for the Gerber Legendary Blades Site, also known as Asgard LLC (Site), which conducts cleanup work under a voluntary cleanup agreement. This letter provides comments for the Vapor Intrusion Data Gap Investigation and October 2024 Focused Feasibility Study prepared by GEOENGINEERS on your behalf.

DEQ has expressed concerns that volatile organic compounds (VOCs), particularly trichloroethene (TCE), are present in sub-slab vapor at concentrations above hot spot thresholds. Hot spot concentrations remain below the building, which poses a potentially unacceptable risk. The proposed Vapor Extraction work should treat hot spots to the extent feasible and consistent with Oregon Cleanup rules to ensure protective conditions for current and potential future conditions. DEQ approves installing the vapor extraction system proposed in the feasibility study and recommends quarterly indoor air sampling to verify the Site indoor air remains acceptable.

However, DEQ disagrees with many of the statements found in the January 2, 2025, Response to Comments Re: Focused Feasibility Study Report. The assertions that the Site does not contribute to the groundwater plume and that Williams Controls is fully responsible for groundwater impacts are not technically supported. Our comments on the Focused Feasibility Study identified other potentially complete risk pathways associated with TCE impacts in groundwater, including ecological risks driven by groundwater discharge to Ball Creek.

The Level I risk assessment conducted by ENVIRON International in 2008 incorrectly concluded there was no suitable fish habitat associated with Ball Creek. However, Ball Creek connects via a stormwater pipeline downgradient to Fanno Creek, which, besides native fish, is listed as an essential salmonid habitat. Ball Creek is also a habitat corridor and additional receptors may be present, including amphibians, birds, and burrowing mammals. These ecological receptors need to be considered.

In September 2020, DEQ updated the guidance for conducting Ecological Risk Assessments, which contain updated screening level values: <https://www.oregon.gov/deq/FilterDocs/EcoRiskIMD.pdf>. DEQ has evaluated upland groundwater concentrations against aquatic life risk-based concentrations and found potential for discharge to Ball Creek exceeding both chronic and acute aquatic life RBCs. Hot spot levels are present.

DEQ requests that you provide a work plan within 60 days of this letter to evaluate groundwater and vapor pathways and characterize the nature and extent of on-site and offsite contamination. The work plan should evaluate ecologic risks using the updated Ecologic Risk Assessment process and the nature and extent of groundwater and vapor intrusion risks onsite and to offsite receptors.

DEQ will request that the adjacent property (Williams Controls, ECSI 4081) evaluate the same potential risks described above as requested for your Site.

Perfluorinated compounds are in the DEQ rulemaking phase and should be final in the fall of 2025. Gerber has historically performed chrome plating of knives. Please consider evaluating perfluorinated chemical use at the site and, if necessary, adding these Contaminants of Interest to site screening.

Please confirm the Site's intent to move forward cooperatively. Provide a schedule for submitting the work plan for screening described in this letter and installing the vapor extraction systems.

Sincerely,

*Jim Orr*

Jim Orr

NWR DEQ Project Manager

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