



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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March 12, 2025

TH & JP, LLC
C/O: Tera Heintz
4300 NE Hancock Street
Portland, OR 97213

sent via e-mail

RE: Conditional No Further Action Determination
Tie's Dry Cleaning
4300 NE Hancock Street
Portland, Oregon
ECSI #6478

Dear Tera Heintz:

The Oregon Department of Environmental Quality (DEQ) reviewed the available information for the above referenced property (the "Site"), including a July 31, 2024 memorandum entitled *July 2024 Technical Memorandum: Indoor Air, Sub-Slab, & 3rd Quarter VES Monitoring* prepared by Succeed Environmental. DEQ's review was conducted under terms of a Voluntary Agreement with TH & JP, LLC dated March 8, 2022.

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 consists of a single tax lot (State ID 1N2E30CC 4900) of 0.34 acres. A single-story building covers the entire property. The Site was developed with three single-family residences by 1924. The subject site remained in residential use until 1937 when the current building was constructed. There are three tenant spaces in the building. Tie's One Hour Dry Cleaning began operations in the northeastern tenant space in 1983. Tetrachloroethylene (PCE) was used in the dry-cleaning operation from 1983 until 1995 when operations were switched to a hydrocarbon-based system. PCE is no longer used at the facility. A fish aquarium business operates in the adjacent space to the east, and a gym is located in the southern tenant space.
- Suspected PCE source areas include the dry-cleaning machine, solvent handling areas, and the sanitary sewer lines beneath the building.
- The initial investigation in 2021 found elevated sub-slab vapor PCE levels up to 230,000 micrograms per meter cubed (ug/m^3), well above DEQ's risk-based concentration of 1,600 ug/m^3 for commercial use. Trichloroethene (TCE), a breakdown product of PCE, and sometimes used as a spot cleaner in dry cleaning operations, was detected up to 3,400 ug/m^3 , compared to its risk-based concentration of 100 ug/m^3 . PCE was detected at 3.47 milligrams per kilogram (mg/kg) in soil collected from a suspected source area at 4 feet below the dry-cleaning machine. TCE was not detected in soil.
- Vapor investigations conducted in September 2022 and March 2023 showed similarly elevated sub-slab concentrations (PCE up to 220,000 ug/m^3 ; TCE up to 9,950 ug/m^3). PCE and TCE were

detected in indoor air at low levels below applicable DEQ risk-based concentrations in the 2022 sampling event. PCE was detected above its risk-based concentration of 47 ug/m³ by an order of magnitude in the 2023 event.

- In response to these results TH & JP, LLC installed a sub-slab depressurization system (SSDS) beneath the floor per a DEQ-approved plan. The SSDS consists of 9 shallow wells fitted with in-line fans that discharge through a common exhaust port. Eight wells are located in the dry cleaner space, and one is located in the fish aquarium store. The SSDS effluent is passed through a granular activated carbon filter prior to discharge to the atmosphere above the roof-line.
- The SSDS was activated in August 2023. Monitoring events were completed in November 2023, February 2024, and May 2024 to assess system operation and seasonal variation in vapor concentrations. PCE and TCE were detected at concentrations below their risk-based concentrations in indoor air. Sub-slab vapor concentrations have decreased overall, although the highest residual concentration of PCE at 44,000 ug/m³ remains well above its risk-based concentration. 1,2 -dichloroethane was detected above the DEQ risk-based concentration in almost every air sample. This occurrence was attributed to operational releases from the fish aquarium store, although this source has not been confirmed. Given that 1,2-dichloroethane was not detected in sub-slab vapor and is not known to be used in dry cleaning operations, it is not considered a contaminant of concern for this Site.
- The Site is zoned CM2 (Commercial Mixed Use 2). The CM2 zone is a medium-scale, commercial mixed-use zone intended for sites in a variety of centers and corridors, in other mixed use areas that are well served by frequent transit, or within larger areas zoned for multi-dwelling development. The Site is completely covered with hardscape; therefore, a formal ecological risk screening was not completed.
- Based on well logs from nearby properties, the local groundwater depth is greater than 60 feet. Groundwater in the vicinity of the Site provides limited beneficial use, with a total of 7 wells listed within about 1 mile of the Site. The shallowest well is listed at 91 feet in depth. Potable water for the Site and surrounding area is provided by the City of Portland. Given the localized nature of contamination beneath the building, and fine-grained shallow soil, DEQ determined that the Site is unlikely to impact groundwater or affect its beneficial use.
- Inhalation of indoor air is the only currently complete human health exposure pathway. Direct contact by excavation or construction workers with contaminated soil is possible should soil be exposure during future site development.
- DEQ held a public comment period in October 2024 to announce its proposal to issue a conditional no further action determination. No comments were received.
- As a condition of the proposed Conditional No Further Action, the owner agrees to maintain the floor of the building and continue operation of the SSDS, including disposal of the carbon filter media as appropriate, per a DEQ-approved operation and maintenance plan.
- Should the Site property be redeveloped, substantial remodeling planned, or be converted to residential use, a DEQ-approved vapor assessment and additional cleanup actions as warranted will be completed by Owner at their expense prior to occupancy to ensure conditions are safe for the intended use.
- Future soil-disturbing activities should be conducted per a DEQ-approved contaminated media management plan.

These controls restrictions ensure long-term protection of human health and the environment and are memorialized in an easement and equitable servitudes recorded on the property deed on January 28, 2025.

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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 [Tie's Dry Cleaning Public File](#) to reflect this decision.

Site information and reports supporting this No Further Action decision can be viewed at: [Tie's Dry Cleaning 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,

A handwritten signature in blue ink, appearing to read 'Kevin Parrett', with a long horizontal flourish extending to the right.

Kevin Parrett, Manager
Northwest Region Cleanup Program

e-copy: Andrew Blake, Succeed Environmental