# Department of Environmental Quality

**Northwest Region**

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August 13, 2024 *via electronic delivery*

Lynn Green

EVRENNORTHWEST

40 SE 24th Avenue

Portland, Oregon 97214

Subject: DEQ Request for a Feasibility Study

Irwin Hodson Site

Subject: DEQ Request for a Feasibility Study

 Portland, Oregon

ECSI # 6399

Lynn Green,

The Oregon Department of Environmental Quality (DEQ) has prepared this letter in response to the August 6, 2024 email from Evren-NW on behalf of Irwin Hodson. Irwin Hodson is currently conducting cleanup work under a voluntary cleanup agreement.

DEQ is concerned with the chronic and acute potential vapor exposure of your tenants of the Irwin Hodson warehouse. The site conditions have not been adequately evaluated to determine current and potential future risks. The evaluation of site risk and a hot spot removal action may require an assessment of data gaps and will require a Feasibility Study (FS)

The email states that Irwin Hodson feels that DEQ’s requirements to achieve site closure are uncertain. Based on the information in the email, the uncertainty appears to be related to the applicability of revised risk-based concentrations (RBCs) associated with sub-slab vapor and s. In addition, the email requests DEQ confirmation that DEQ will issue a no further action letter if various conditions are met and states that Irwin Hodson is unwilling to move forward consistent with DEQ’s direction until DEQ agrees to the site closure requirements.

Before DEQ can review and approve remedy performance requirements, it will need to select a remedial action. The FS, which DEQ has identified as the next step for the Irwin Hodson site, will inform the remedial action selection. If the selected removal action has contaminants at concentrations above acceptable risk levels but below hot spot levels. A no further action determination will be conditional based on the long-term effectiveness of engineering and/or institutional controls.

DEQ requests that the FS be performed and reported to DEQ within 30 days of this letter. If Irwin Hodson is unwilling to perform an FS, DEQ will consider a more directed process.

Sincerely,

***Jim Orr***

Jim Orr

NWR DEQ Project Manager

Ec:

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