

From: [HANSON Don * DEQ](#)
To: [Steve Korth](#)
Cc: [Mark Myers - Williams Kastner \(mmyers@williamskastner.com\)](#); [Brad Berggren - PNG](#); [Paul McBeth - PNG](#); [Guy Tanz \(gtanz@pngenv.com\)](#)
Subject: Springvilla Cleaners: DEQ Comments on GW and VI sampling Memos
Date: Thursday, May 15, 2025 3:53:00 PM
Attachments: [2025-05-15-DEQ-Letter.pdf](#)

Dear Steve,

Attached are my comments on two of PNG's recent deliverables for the Springvilla site. Please let me know if you have any questions or would like to discuss.

Sincerely,
Don Hanson

Donald E. Hanson, RG
Project Manager, Hydrogeologist
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May 15, 2025

Mr. Steve Korth
McKay Investment Co. LLC
2300 Oakmont Way, Suite 204
Eugene, OR 97401
(steve@oakwaycenter.com)

Re: Review of March 2025 Groundwater Memorandum and December 2024 Soil Gas Memorandum, Former Springvillia Cleaners Site, Springfield, Oregon DEQ Cleanup File #3222

Dear Mr. Korth:

I have reviewed the March 2025 Semi-Annual Groundwater Technical Memorandum and the December 2024 Soil Gas Investigation Technical Memorandum, which were prepared on your behalf by PNG Environmental, Inc. I have several comments and requests for additional investigation regarding the groundwater plume delineation, the soil vapor delineation on the site, as well as future risk assessment and feasibility study activities. My comments for each of these are presented below.

March 2025 Seimi-Annual Groundwater Technical Memorandum

1. First paragraph, page 6. Regarding future land use, it is becoming apparent, based on conversations with the city and concepts that have been considered for the site, that the site will likely be used for high density residential, such as apartments; However, land use may also include commercial.
2. First bullet, page 6. Future residential receptors should also be considered when comparing data to DEQ risk-based concentrations (RBCs). In regard to the last sentence, contamination in soil below 3 feet deep would be relevant for the construction worker and excavation worker exposure pathways, but not residential or occupational pathways, which are focused on the upper 3 feet of soil.
3. First bullet, page 7. Regarding the soil gas monitoring and the variation between the silt and overlying gravel zones, additional soil vapor monitoring is required (see comments on the Soil Gas Technical Memo, below).
4. First sentence, page 8. Irrigation well use is an important potential exposure pathway for residents living over the Springvillia plume and is discussed in more detail in the groundwater monitoring report review comments. Irrigation well use in the locality of the facility is a significant pathway that will need further investigation. DEQ would like to meet with PNG's risk assessor about development of site-specific risk-based concentrations for the irrigation water exposure pathway for PCE and TCE.

5. Section 4.2.1, Plume Geometry. Some of the figure references seem to be for previous reports (e.g., “[Figure 18][PNG 2021]”), that are not included in this report. Similarly, the last sentence on page 11 references Figure 19, which is not included in this report. There are references to temporary well points labeled “PNG-“ that were described in the April 2021 groundwater monitoring report, which don’t appear on the figures in this report, which is a little confusing. If possible, it is useful to include the relevant tables and figures for the data presented in the report.
6. The expanded downgradient monitoring well network, along with the monitoring conducted at the Q Street residential domestic well, show the intermediate zone plume pushing to the northwest. The plume axis, as it crosses beneath Hwy 126, appears to be approximately in line with MW-33cmt and the Q Street residential well. The PCE concentrations in the domestic well remain elevated at about twice the residential tap water RBC and TCE concentrations are roughly an order of magnitude greater than the TCE RBC. There appears to be a data gap downgradient of the Q Street domestic well, well MW 53i, and well MW 52i.
7. Additional monitoring wells are needed to further define the extent of the groundwater contaminant plume to the northwest of the existing monitoring well network. To help with the citing of new monitoring wells, DEQ recommends revisiting the BioChlor groundwater model, using the more recent data inputs, to help predict the downgradient extent of the contamination.
8. The Q Street residential well is on or near the axis of the downgradient portion of the plume, ; Therefore, it will likely be necessary to monitor the well ,as well as preforming operation and maintenance of the carbon filters, for more than a decade from now. While carbon filters are effective in removing PCE and TCE, city water is available in this area. DEQ recommends discussing connecting the property to city water with the owner and providing an offset to the owner for city water bills they would incur. A shift to city water could also allow the well on the property to be used for monitoring and it could be more closely evaluated to determine its depth and water bearing zone. This information could be used in the evaluation of citing new downgradient monitoring wells along with other tools discussed above.
9. Along with expanding the groundwater monitoring well network, the beneficial groundwater use survey boundary should be expanded proportionally to the north/northwest. Continued biennial beneficial use survey updates will be needed through the duration of the remedial investigation/feasibility study (RI/FS) and remedy selection phases of this project.

December 2024 Soil gas Investigation Technical Memorandum

1. The ECSI (Cleanup) project number in the title block is incorrect. The correct cleanup project number is 3222. While we still use the old numbering system from the

Environmental Cleanup Site Information (ECSI), that database has been moved into our new online system, Your DEQ Online. The cleanup numbers remain the same.

2. The soil vapor sampling found that higher concentrations of PCE were in the deeper soil gas wells, which were installed into the silt zone beneath the gravel fill. However, the deeper soil vapor testing was limited to seven locations on the site, mainly focused beneath the former Waremart building. The lateral extent of the deeper soil vapor contamination in the silt zone has not been defined.

DEQ requests that the soil vapor monitoring network and monitoring be expanded to include additional deeper soil vapor points within the silt, to better understand the extent of the soil vapor plume in the vicinity of the former Waremart building. DEQ requests that deeper soil vapor wells be installed and co-located with the following shallow vapor wells: SG-5, SG-11, SG-15, SG-17, SG-22, and SG-23. Additionally, a new deep vapor probe should be located between points SG-7 and SG-8 to fill the gap in that area.

Feasibility Study Planning and Preparations

DEQ feels that it is a good time to begin looking toward the feasibility study (FS) phase of the RI/FS. The FS evaluates cleanup technologies and remedial action alternatives for the site, including off-site impacts, following the risk assessment. We feel it would be useful to begin discussions about the FS, by developing and evaluating a table or tables of technologies and conceptual alternatives that might be included in the FS. I will reach out to PNG to plan for these discussions.

Next Steps

- The memoranda do not need to be revised and/or resubmitted. Please consider and address my comments in future reporting.
- **Please prepare a work plan or plans for expanding the groundwater monitoring well and soil vapor monitoring well networks, and associated monitoring, to determine the extent of the groundwater and vapor plumes. This should also include expansion of the groundwater beneficial use survey boundaries. DEQ requests that the work plan, or plans, be delivered to DEQ by July 18, 2025.**
- I will coordinate with PNG regarding a meeting with our risk assessor and PNG's toxicologist to discuss the irrigation well RBC issue as well as initial scoping of the baseline risk assessment.
- Regarding the FS scoping, DEQ recommends that a meeting with PNG is established, to discuss this task and its components, prior to the development of the tables. I will reach out to PNG about setting up a call to begin this process.

Mr. Steve Korth
May 15, 2025
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Thank you for your continued work on this high priority project. If you or PNG have any questions regarding this request, please do not hesitate to contact me at 503-329-7391, or by email at don.hanson@deq.oregon.gov.

Sincerely,

Donald Hanson

Donald Hanson, RG
Project Manager & Hydrogeologist

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ORMS File 3222