

**From:** [ORR Jim \\* DEQ](#)  
**To:** [Gil Cobb](#)  
**Cc:** [Jennifer Gates](#); [THOMAS Wesley \\* DEQ](#); [HOY Ray \\* DEQ](#); [WOZAB Amanda \\* DEQ](#); [ORR Jim \\* DEQ](#)  
**Subject:** DEQ Approval of Vapor Intrusion Evaluation Work Plan for ESCO 6285  
**Date:** Tuesday, August 12, 2025 3:37:39 PM  
**Attachments:** [image001.png](#)  
[image003.png](#)

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Gil,


Please proceed with the work plan.

*Thank You kindly  
Jim Orr R.G.  
DEQ Northwest Region  
700 NE Multnomah St., Suite 600  
Portland, Oregon 97232  
503-961-2647 Cell Phone  
[jim.orr@deq.oregon.gov](mailto:jim.orr@deq.oregon.gov)*

*Someday, I hope to be the person that my dogs believe I am*



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**From:** Gil Cobb <[gil@pointsourcesolutions.com](mailto:gil@pointsourcesolutions.com)>  
**Sent:** Tuesday, August 12, 2025 2:14 PM  
**To:** ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)>  
**Cc:** Jennifer Gates <[jgates@pearllegalgroup.com](mailto:jgates@pearllegalgroup.com)>; THOMAS Wesley \* DEQ <[Wesley.THOMAS@deq.oregon.gov](mailto:Wesley.THOMAS@deq.oregon.gov)>; HOY Ray \* DEQ <[Ray.HOY@deq.oregon.gov](mailto:Ray.HOY@deq.oregon.gov)>; WOZAB Amanda \* DEQ <[Amanda.Wozab@deq.oregon.gov](mailto:Amanda.Wozab@deq.oregon.gov)>  
**Subject:** Re: COIs for Request to Perform Vapor Intrusion Evaluation for ESCO 6285

Jim and Team,

Please see attached the requested work plan for the Building 4 VI evaluation. As soon as you give us the go ahead we will get mobilized.

Gil Cobb, RPG

Oregon #G1440

Washington #1592

Point Source Solutions

5317 NE St Johns Road, Suite D

Vancouver, Washington 98661

phone: 503.916.9254

On Mon, Aug 11, 2025 at 3:45 PM ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)> wrote:


Gil,  
TO-15 will be good.

Thank You kindly  
Jim Orr R.G.  
DEQ Northwest Region  
700 NE Multnomah St., Suite 600  
Portland, Oregon 97232  
503-961-2647 Cell Phone  
[jim.orr@deq.oregon.gov](mailto:jim.orr@deq.oregon.gov)

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**From:** Gil Cobb <[gil@pointsourcesolutions.com](mailto:gil@pointsourcesolutions.com)>  
**Sent:** Monday, August 11, 2025 3:41 PM  
**To:** ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)>  
**Cc:** Jennifer Gates <[jgates@pearllegalgroup.com](mailto:jgates@pearllegalgroup.com)>; THOMAS Wesley \* DEQ <[Wesley.THOMAS@deq.oregon.gov](mailto:Wesley.THOMAS@deq.oregon.gov)>; HOY Ray \* DEQ <[Ray.HOY@deq.oregon.gov](mailto:Ray.HOY@deq.oregon.gov)>; WOZAB Amanda \* DEQ <[Amanda.Wozab@deq.oregon.gov](mailto:Amanda.Wozab@deq.oregon.gov)>  
**Subject:** Re: COIs for Request to Perform Vapor Intrusion Evaluation for ESCO 6285

Jim,

We cant run DX in TO-15, only TO-17. We can run APH in TO-15 which covers the gasoline range chains and the more volatile constituents of the diesel range. Otherwise we can DX by TO-17.

Please advise.

Gil Cobb, RPG

Oregon #G1440

Washington #1592

Point Source Solutions

5317 NE St Johns Road, Suite D

Vancouver, Washington 98661

phone: 503.916.9254

On Mon, Aug 11, 2025 at 2:29 PM ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)> wrote:

Gil,  
Please consider the following COIs for the VI evaluation:  
EPA Method TO-15 VOCs, Gasoline, Diesel, and Chloroform.


Provide a table with COIs, the VI screening level, and method detection limits.

Thank You kindly  
Jim Orr R.G.  
DEQ Northwest Region  
700 NE Multnomah St., Suite 600  
Portland, Oregon 97232  
503-961-2647 Cell Phone  
[jim.orr@deq.oregon.gov](mailto:jim.orr@deq.oregon.gov)

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**From:** ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)>  
**Sent:** Friday, August 8, 2025 2:15 PM  
**To:** Gil Cobb <[gil@pointsourcesolutions.com](mailto:gil@pointsourcesolutions.com)>  
**Cc:** Jennifer Gates <[jgates@pearllegalgroup.com](mailto:jgates@pearllegalgroup.com)>; THOMAS Wesley \* DEQ <[Wesley.THOMAS@deq.oregon.gov](mailto:Wesley.THOMAS@deq.oregon.gov)>; HOY Ray \* DEQ <[Ray.HOY@deq.oregon.gov](mailto:Ray.HOY@deq.oregon.gov)>; WOZAB Amanda \* DEQ <[Amanda.Wozab@deq.oregon.gov](mailto:Amanda.Wozab@deq.oregon.gov)>; ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)>; ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)>  
**Subject:** RE: Request to Perform Vapor Intrusion Evaluation for ESCO 6285

Gil.

This is DEQ's recommendation for a work plan for VI.

I think the initial screening of a minimum of three points around the building at 5 feet and just above the highest recorded groundwater elevation is reasonable. This plan would be adequate to demonstrate if soil vapors are below human health screening levels.

If exceedances are found, building sub-slab vapor sampling on a quarterly schedule would be necessary. If exceedances are found, further investigation and vapor controls should be considered.

Future development for occupational use should revisit the issue using the full VI guidance.

Let me know when to expect the VI work plan.

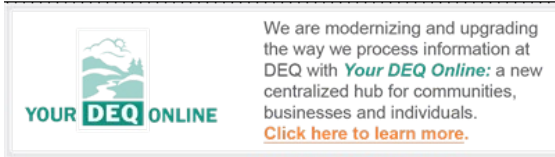
Jim

Thank You kindly  
Jim Orr R.G.  
DEQ Northwest Region  
700 NE Multnomah St., Suite 600  
Portland, Oregon 97232  
503-961-2647 Cell Phone  
[jim.orr@deq.oregon.gov](mailto:jim.orr@deq.oregon.gov)

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**From:** Gil Cobb <[gil@pointsourcesolutions.com](mailto:gil@pointsourcesolutions.com)>  
**Sent:** Thursday, August 7, 2025 2:04 PM  
**To:** ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)>  
**Cc:** Jennifer Gates <[jgates@pearllegalgroup.com](mailto:jgates@pearllegalgroup.com)>; THOMAS Wesley \* DEQ <[Wesley.THOMAS@deq.oregon.gov](mailto:Wesley.THOMAS@deq.oregon.gov)>; HOY Ray \* DEQ <[Ray.HOY@deq.oregon.gov](mailto:Ray.HOY@deq.oregon.gov)>; WOZAB Amanda \* DEQ <[Amanda.Wozab@deq.oregon.gov](mailto:Amanda.Wozab@deq.oregon.gov)>  
**Subject:** Re: Request to Perform Vapor Intrusion Evaluation for ESCO 6285

Jim,

One follow question for the vapor evaluation work plan - is DEQ going to be ok with a single sampling event or will we be required to conduct two sampling events 6 months apart per the new guidance? Obviously the second scenario would hold up the conditional NFA and if that is the case I would want our client to understand the ramifications up front.

Thanks,

Gil Cobb, RPG

Oregon #G1440

Washington #1592

Point Source Solutions

5317 NE St Johns Road, Suite D

Vancouver, Washington 98661

phone: 503.916.9254

On Wed, Aug 6, 2025 at 1:52 PM ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)> wrote:

Jennifer and Gil,

After consideration of the screening of vapor intrusion risk for the occupied building at the ESCO site, DEQ believes there is a current risk from vapor intrusion.

DEQ requests that you submit for approval a subsurface vapor sampling plan that considers current guidance. This screening for vapor intrusion risk is necessary for completion of the conditional no further action.

I will send you an Easement and Equitable Servitude (EES) document as soon as possible for your comments. The EES will describe the removal actions required for residential use of the site.

Please propose a meeting if you wish to discuss.


*Thank You kindly  
Jim Orr R.G.  
DEQ Northwest Region  
700 NE Multnomah St., Suite 600*

Portland, Oregon 97232  
503-961-2647 Cell Phone  
[jim.orr@deq.oregon.gov](mailto:jim.orr@deq.oregon.gov)

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**From:** Gil Cobb <[gil@pointsourcesolutions.com](mailto:gil@pointsourcesolutions.com)>  
**Sent:** Wednesday, August 6, 2025 8:39 AM  
**To:** ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)>  
**Cc:** Jennifer Gates <[jgates@pearlegalgroup.com](mailto:jgates@pearlegalgroup.com)>; THOMAS Wesley \* DEQ <[Wesley.THOMAS@deq.oregon.gov](mailto:Wesley.THOMAS@deq.oregon.gov)>; HOY Ray \* DEQ <[Ray.HOY@deq.oregon.gov](mailto:Ray.HOY@deq.oregon.gov)>  
**Subject:** Re: Vapor Intrusion Data for ESCO 6285

Jim,

We have not performed any soil vapor screening or indoor air quality sampling in or around Building 4 which is the only building on the former plant site.

Gil Cobb, RPG  
Oregon #G1440  
Washington #1592

Point Source Solutions  
5317 NE St Johns Road, Suite D  
Vancouver, Washington 98661  
phone: 503.916.9254

On Wed, Aug 6, 2025 at 8:31 AM ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)> wrote:


Gil,  
Has there been any indoor air samples or soil vapor screening in or near occupied buildings for vapor intrusion?

*Thank You kindly  
Jim Orr R.G.  
DEQ Northwest Region  
700 NE Multnomah St., Suite 600  
Portland, Oregon 97232  
503-961-2647 Cell Phone  
[jim.orr@deq.oregon.gov](mailto:jim.orr@deq.oregon.gov)*

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**From:** ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)>  
**Sent:** Thursday, December 5, 2024 11:31 AM  
**To:** Gil Cobb <[gil@pointsourcesolutions.com](mailto:gil@pointsourcesolutions.com)>  
**Cc:** Warren Rosenfeld <[warren@calbag.com](mailto:warren@calbag.com)>; ISMERIO Dawn \* DEQ <[Dawn.ISMERIO@deq.oregon.gov](mailto:Dawn.ISMERIO@deq.oregon.gov)>; Jennifer Gates <[jgates@pearllegalgroup.com](mailto:jgates@pearllegalgroup.com)>; WOZAB Amanda \* DEQ <[Amanda.Wozab@deq.oregon.gov](mailto:Amanda.Wozab@deq.oregon.gov)>; THOMAS Wesley \* DEQ <[Wesley.THOMAS@deq.oregon.gov](mailto:Wesley.THOMAS@deq.oregon.gov)>; HOY Ray \* DEQ <[Ray.HOY@deq.oregon.gov](mailto:Ray.HOY@deq.oregon.gov)>; Valerie Pratt <[valerie@shakersquarellc.com](mailto:valerie@shakersquarellc.com)>; Karrie Hanford <[karrie@shakersquarellc.com](mailto:karrie@shakersquarellc.com)>; ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)>; ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)>  
**Subject:** RE: ESCO 6285 Follow-Up DEQ Responses to Point Source Comments 8-16-2024

The Remedial Investigation (RI) report needs to evaluate the Vapor Intrusion (VI) pathway in the Conceptual Site Model and use the available data to assess potential risk based on current or future risk.

If there is a potential future VI risk, the RI should provide details of what the risk is. A Focused Feasibility Study may not be required until the area of impact is developed and the current risk changes.

An institutional control, particularly for future buildings, would be an appropriate way to address the risk after it is quantified.

I approve of your proceeding to draft the RI.  
Let me know if you have additional concerns or questions.

Please let me know your schedule for the RI submittal.

Thank you  
Jim

---

**From:** Gil Cobb <[gil@pointsourcesolutions.com](mailto:gil@pointsourcesolutions.com)>  
**Sent:** Thursday, December 5, 2024 10:21 AM  
**To:** ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)>  
**Cc:** Warren Rosenfeld <[warren@calbag.com](mailto:warren@calbag.com)>; ISMERIO Dawn \* DEQ <[Dawn.ISMERIO@deq.oregon.gov](mailto:Dawn.ISMERIO@deq.oregon.gov)>; Jennifer Gates <[jgates@pearllegalgroup.com](mailto:jgates@pearllegalgroup.com)>; WOZAB Amanda \* DEQ <[Amanda.Wozab@deq.oregon.gov](mailto:Amanda.Wozab@deq.oregon.gov)>; THOMAS Wesley \* DEQ <[Wesley.THOMAS@deq.oregon.gov](mailto:Wesley.THOMAS@deq.oregon.gov)>; HOY Ray \* DEQ <[Ray.HOY@deq.oregon.gov](mailto:Ray.HOY@deq.oregon.gov)>; Valerie Pratt <[valerie@shakersquarellc.com](mailto:valerie@shakersquarellc.com)>; Karrie Hanford <[karrie@shakersquarellc.com](mailto:karrie@shakersquarellc.com)>  
**Subject:** Re: ESCO 6285 Follow-Up DEQ Responses to Point Source Comments 8-16-2024

Jim,

Should we be expecting comments back on the proposed TOC for the report revision before end of year?

Gil Cobb, RPG

Oregon #G1440

Washington #1592

Point Source Solutions  
5317 NE St Johns Road, Suite D  
Vancouver, Washington 98661  
phone: 503.916.9254

On Thu, Dec 5, 2024 at 8:36 AM ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)> wrote:  
Thank you, and have a great holiday!

---

**From:** Warren Rosenfeld <[warren@calbag.com](mailto:warren@calbag.com)>  
**Sent:** Thursday, December 5, 2024 8:27 AM  
**To:** ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)>  
**Cc:** Gil Cobb <[gil@pointsourcesolutions.com](mailto:gil@pointsourcesolutions.com)>; ISMERIO Dawn \* DEQ <[Dawn.ISMERIO@deq.oregon.gov](mailto:Dawn.ISMERIO@deq.oregon.gov)>; Jennifer Gates <[jgates@pearllegalgroup.com](mailto:jgates@pearllegalgroup.com)>; WOZAB Amanda \* DEQ <[Amanda.Wozab@deq.oregon.gov](mailto:Amanda.Wozab@deq.oregon.gov)>; THOMAS Wesley \* DEQ <[Wesley.THOMAS@deq.oregon.gov](mailto:Wesley.THOMAS@deq.oregon.gov)>; HOY Ray \* DEQ <[Ray.HOY@deq.oregon.gov](mailto:Ray.HOY@deq.oregon.gov)>; Valerie Pratt <[valerie@shakersquarellc.com](mailto:valerie@shakersquarellc.com)>; Karrie Hanford <[karrie@shakersquarellc.com](mailto:karrie@shakersquarellc.com)>  
**Subject:** Re: ESCO 6285 Follow-Up DEQ Responses to Point Source Comments 8-16-2024

Jim,  
You are correct--an oversight on my part.  
We will get this out today, and of course DEQ will have our NFA back by tomorrow.)  
Happy Holidays,  
Warren

On Thu, Dec 5, 2024 at 8:03 AM ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)> wrote:

All,  
I learned yesterday that your site has outstanding invoices.  
  
Please get in touch with DEQ accounting to settle this issue.  
Contact Dawn Ismerio (via email).

Thank you  
Jim

---

**From:** Gil Cobb <[gil@pointsourcesolutions.com](mailto:gil@pointsourcesolutions.com)>  
**Sent:** Thursday, November 21, 2024 12:28 PM  
**To:** ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)>  
**Cc:** Warren Rosenfeld <[warren@calbag.com](mailto:warren@calbag.com)>; Jennifer Gates <[jgates@pearllegalgroup.com](mailto:jgates@pearllegalgroup.com)>; WOZAB Amanda \* DEQ <[Amanda.Wozab@deq.oregon.gov](mailto:Amanda.Wozab@deq.oregon.gov)>; THOMAS Wesley \* DEQ <[Wesley.THOMAS@deq.oregon.gov](mailto:Wesley.THOMAS@deq.oregon.gov)>; HOY Ray \* DEQ <[Ray.HOY@deq.oregon.gov](mailto:Ray.HOY@deq.oregon.gov)>  
**Subject:** Re: ESCO 6285 Follow-Up DEQ Responses to Point Source Comments 8-16-2024

Jim,  
  
I sent you a revised TOC for the report on October 31. Just making sure yu received it.

Thanks,  
Gil Cobb, RPG  
Oregon #G1440  
Washington #1592

Point Source Solutions

5317 NE St Johns Road, Suite D  
Vancouver, Washington 98661  
phone: 503.916.9254

On Fri, Sep 6, 2024 at 9:45 AM Gil Cobb <[gil@pointsourcesolutions.com](mailto:gil@pointsourcesolutions.com)> wrote:

Jim,

The link to the RI FS document that you provided in the August 30 document links to DEQs Remedial Investigation/Feasibility Study Scope of Work which included RI Report guidance (starting on page 14), but this guidance is dated February 2002 (over 22 years old) and I do not see any references to actual remedial actions or current risk assessment evaluation in the guidance. It appears to be heavy on the site characterization planning and remedial action feasibility and light on actual remediation and post-remedial evaluation.

I propose that Point Source prepares a "Table of Contents" to address your concerns and then request comments from DEQ before proceeding with the report.

I will be out next week, but will prepare this submittal as soon as I return.

Gil Cobb, RPG  
Oregon #G1440  
Washington #1592

Point Source Solutions  
5317 NE St Johns Road, Suite D  
Vancouver, Washington 98661  
phone: 503.916.9254

On Fri, Aug 30, 2024 at 9:48 AM ORR Jim \* DEQ <[Jim.ORR@deq.oregon.gov](mailto:Jim.ORR@deq.oregon.gov)> wrote:

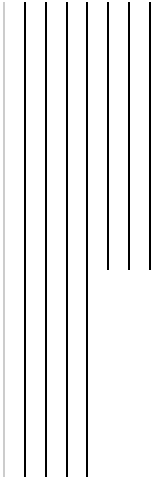
ESCO Team,  
Please let me know if you have any questions and provide an estimated schedule for submittal of the RI report.

Here's the attachment as a link for you to view:  
[8-30-2024 DEQ Response to ESCO ECSI 6285 Point Source Consultant Response 8-16-2024 to ODEQ July 26 2024 Letter 08162024.docx](#)

Add your comments and collaborate with others in real time. You don't need to download Acrobat or sign up to access the file.

*Thank You kindly*  
*Jim Orr R.G.*  
*DEQ Northwest Region*  
*700 NE Multnomah St., Suite 600*  
*Portland, Oregon 97232*  
*503-961-2647 Cell Phone*  
[jim.orr@deq.oregon.gov](mailto:jim.orr@deq.oregon.gov)





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[State of Oregon: Department of Environmental Quality](#)

[Oregon DEQ: Land Quality - Environmental Cleanup Site Information \(ECSI\) Database](#)

