



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

November 3, 2025

sent via email delivery only

Cody Knope-Jenkins
Skyhook Bouldering
2436 SE 12th Avenue
Portland, OR 97214

RE: Contaminated Media Management Plan
Skyhook Bouldering
Portland, Oregon
DEQ LUST Program No. 26-23-0131

Dear Cody:

This letter provides Oregon Department of Environmental Quality (DEQ) review comments of the *Contaminated Media Management Plan* (CMMP) dated October 2, 2025, for the former Twelfth Avenue Motor Service property located at 2436 SE 12th Avenue in Portland, Oregon (Site). The CMMP was prepared on your behalf by Point Source Solutions, LLC. DEQ requests that a revised CMMP be prepared and submitted to DEQ that incorporates the comments described below.

1. **General Comment.** Please include a table of contents and page numbers.
2. **Section 1.0, Introduction.** Include that the CMMP was prepared as one of the requirements of the Easement & Equitable Servitudes (EES) for the Site recorded with Multnomah County on October 28, 2025.
3. **Section 4.2, Applicable Environmental Investigations.** Please reference the UST Decommissioning & Risk-Based Correction Action Report dated August 6, 2025, instead of the Risk-Based Corrective Action Report because the former is a more comprehensive report and will be specifically referenced in the conditional No Further Action letter.
4. **Section 6.0, Preliminary Site Redevelopment Activities.** Please state that redevelopment activities will be performed in accordance with the EES that requires the following:


Prior to the construction of future buildings for human occupation, the Owner will perform a site assessment in accordance with a DEQ-approved work plan adequate to demonstrate that residual contamination does not pose unacceptable vapor intrusion risks to future building occupants. Alternatively, if potential vapor intrusions risks are identified, the Owner must perform additional cleanup and/or incorporate DEQ-approved, professionally installed vapor mitigation engineering control(s) into the building design for any future buildings for human occupation constructed at the Property.

5. **Section 6.1, ODEQ Notification.** Change to at least 30 days to allow time for a future DEQ manager to review and evaluate previous investigations and redevelopment plans. Also add that DEQ must also be notified within 3 days following discovery of contamination outside the area of known contamination.
6. **Section 6.2, Hazard Communication Plan (HSP) & Health and Safety Plan.**
 - a. In recognition that a HSP is often not prepared for cleanup sites, please state that, alternatively, a HASP can be prepared that incorporates the required elements (per Oregon OSHA regulations) of the HSP to serve as an all-in-one document.

- b. The second paragraph states that the RP must prepare the site-specific HASP. Please change this to indicate, similar to the language used for the HSP, that the RP, Site operator, or contractor must prepare the site-specific HASP.
7. **Section 7.2, Identification and Management of Contaminated Soil.** Please spell out the abbreviation of BaPeq.
8. **Section 7.4, Soil Management Method #2.** Condition No. 3 is not needed because soils with chemical concentrations below the stated screening levels (clean fill and residential direct contact risk-based concentration screening levels) do not have to be capped. There are no restrictions for reuse of soils on-site that meet the screening levels.
9. **Section 7.8, Reporting Requirements.**
 - a. Please add that a report of any remedial activities and disposal records must be submitted to DEQ within 60 days after completion of work.
 - b. Last sentence, change Section 6.8 to Section 7.9.

DEQ appreciates your efforts to address the environmental concerns at the Site. Please submit to DEQ a revised CMMP within 30 days of the date of this letter. Please contact me if you have any questions or concerns regarding this letter.

Sincerely,



David Lamadrid
Project Manager
Northwest Region Cleanup Program

cc: Conor McGeehan, Point Source Solutions, LLC
Gil Cobb, Point Source Solutions, LLC
DEQ LUST Program No. 26-23-0131