

DEQ Requests Comments on Proposed Conditional No Further Action Determination for Rogue Primary School Cleanup



State of Oregon
Department of
Environmental
Quality

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restoring, maintaining
and enhancing the
quality of Oregon's air,
land and water.*

Comments due: 5 p.m., April 6, 2023

Project location: 615 S. Second St., Central Point, OR 97502

Proposal: The Oregon Department of Environmental Quality is proposing a conditional no further action, or CNFA, determination for the investigation and cleanup of contamination related to underground storage of petroleum products in a concrete vault and a used oil pan on the Rogue Primary School voluntary cleanup site. The site is located on Central Point School District 6 property in Central Point. Central Point School District 6 joined DEQ's Voluntary Cleanup Program in 2022 to help address the contamination encountered on the property during excavation activities for the new school building. DEQ is proposing to issue a CNFA because the remaining contamination on the site does not pose a risk to human health or the environment with the implementation of a deed restriction outlined below.

Highlights: The Rogue Primary School property is approximately 5.68 acres and houses a newly constructed main building, which covers approximately 39,000 square feet, located in the center of the property and a secondary building, which covers approximately 4,500 square feet, located to the northwest. The site entrance is a paved driveway located on South First Street. During the recent school renovation, a shallow stormwater detention pond was constructed on the southwest corner of the property, near the main entrance. The City of Central Point recently rezoned the property and it is now zoned Commercial – School Improved. It is highly likely the property will continue to be used as school for the foreseeable future.

Soil excavation was conducted in March 2022 as a part of constructing the new school building and installation of underground utilities at the site. A concrete structure was encountered southwest of the new building during the excavation activities. The structure was confirmed to be a concrete vault that was used to store petroleum products. Petroleum contaminated soil, or PCS, was discovered during the process of removing soil around the vault. The remains of the concrete vault, its contents, and surrounding PCS were excavated and transported to Dry Creek Landfill. During the excavation of soil for the stormwater detention pond south of the concrete vault in August 2022, a used oil pan with oil and PCS was discovered. The PCS in the immediate area of the oil pan was removed and transported to Dry Creek Landfill.

A series of soil, groundwater and soil gas investigations were completed at the site. The contaminants of interest included petroleum, volatile organic compounds, polycyclic aromatic hydrocarbons and heavy metals. Petroleum contamination remaining on the property extends west from the area of the concrete vault excavation and includes a portion of the South First Street right-of-way.

Elevated levels of diesel above acceptable risk levels for the site were found in shallow soils in the area of the former concrete vault. This location and the observed residual diesel contamination are under the paved entrance to the site and it is unlikely school children and workers will come into contact with this contamination. Concentrations of gasoline and naphthalene in soil exceeded acceptable risk levels for vapor intrusion into buildings and

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volatilization to outdoor air for school children, however, soil gas was sampled directly and the highest concentrations of these contaminants detected in soil gas were below acceptable risk levels.

Concentrations of diesel in soil exceeded acceptable risk levels for ingestion, inhalation and dermal contact for construction workers working in soil below 3.5 feet below ground surface. Concentrations of diesel observed in groundwater also exceeded the solubility limit for diesel, and any concentration detected above this limit indicates the potential presence of diesel free product in the subsurface. Direct contact with free product creates a health risk to construction and excavation workers due to potential ingestion, inhalation or dermal contact. Free product was not directly encountered during site investigation and cleanup activities, although a sheen was observed on groundwater that gathered in the excavation. The soil with the most contamination was removed during the cleanup activities at the oil pan and vault excavations, which should help groundwater conditions to improve greatly over time.

The remaining contamination on the site does not pose a risk to human health or the environment based on current and likely future use of the site, as long as the following condition is maintained: a contaminated media management plan and worker health and safety plan are followed during any subsurface work in the contaminated areas. This condition will be implemented through a deed restriction that will be recorded with the property prior to issuance of the CNFA.

How to comment: Send comments by 5 p.m. on April 6, 2023 to DEQ Project Manager Ellen Woods by phone at 541-606-0490, email ellen.woods@deq.oregon.gov, or mail to Attn: Ellen Woods, Western Region DEQ, 165 E. Seventh Ave., Suite 100, Eugene, OR 97401.

Find more information: Detailed information supporting DEQ's proposed CNFA determination is contained in DEQ's February 2023 Staff Memo. This document is located on DEQ's [Environmental Cleanup Site Information](#) database (Search Site ID 6520). If you do not have web access and want to review the project file, contact the DEQ project manager at 541-606-0490.

The next step: DEQ will address comments received after the end of the comment period and prior to issuing the CNFA.

Alternative formats: DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.



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