

To: Kevin Parrett
Manager, Northwest Region Cleanup & Tanks

Date: April 4, 2024

From: David Lamadrid
LUST Cleanup Project Manager

Subject: Justification for LUST File Administrative Closure, Mobil Service Station, 50
Northeast Burnside Road, Gresham, Oregon, LUST File No. 26-23-0486

The Oregon Department of Environmental Quality (DEQ) has completed review of a report for the above-referenced property (Site) entitled *Phase II Environmental Site Assessment* (Phase II ESA) dated June 20, 2023, prepared by BB&A Environmental, LLC, for Mountain Pacific Bank as part of environmental due diligence for potential purchase of the property. Limited petroleum hydrocarbon contamination was discovered during the Phase II ESA that was subsequently reported to DEQ under the leaking underground storage tank (LUST) program rules. DEQ has determined that the contamination was not due to a release from the onsite underground storage tank (UST) system and was therefore erroneously reported to DEQ as a LUST release. As a result, DEQ is administratively closing the LUST file. The following describes the basis for this determination.

- Soil and groundwater at the Site were historically contaminated by petroleum fuel releases from former USTs decommissioned in 1990 (LUST No. 26-89-0183). Groundwater was also impacted by onsite migration of contaminated groundwater from an adjacent property to the east, identified as the former Hanna/Unocal service station (LUST No. 26-90-0020). The magnitude of the Site contamination was such that active remediation of soil (soil vapor extraction) and groundwater (pump and treat) were implemented throughout most of the 1990s. LUST file 26-89-0183 received a conditional No Further Action (NFA) determination in 2011, with an Easement and Equitable Servitude (EES) prohibiting future residential use of the Site. LUST file 26-90-0020 received a NFA determination in 2002.
- The purpose of the Phase II ESA was to evaluate if contaminant concentrations in soil and groundwater at the Site were consistent with concentrations after active remediation was completed. Soil and groundwater samples were collected on June 8, 2023, from five push probe borings (P1 through P5) advanced in the areas of the former USTs (also the area of the current USTs), pump islands, and near the adjacent former Hanna/Unocal property.
- Petroleum hydrocarbon and related constituent concentrations in soil and groundwater were consistent with historical results and did not indicate a recent release of petroleum fuel from the UST system. Notably for groundwater, petroleum hydrocarbons and Risk-Based Decision Making (RBDM) volatile organic compounds (VOCs) were not detected except for a low concentration of benzene (0.330 micrograms per liter) in one sample.
- Water samples were also collected during the Phase II ESA from two leak detection observation wells (OB Well NE and OB Well SW) installed within the UST cavity. Petroleum hydrocarbons and RBDM VOCs were not detected in the OB Well NE sample. Gasoline-range petroleum hydrocarbons and some RBDM VOCs were detected in the OB Well SW sample (free product was not encountered). It was this finding that prompted reporting a

petroleum hydrocarbon release and opening the recent LUST file No. 26-23-0486. An attempt was made approximately three weeks later (July 3, 2023) to evacuate water from OB Well SW and resample, but no water was present in the observation well, suggesting the water previously encountered may have been a temporary, perched water condition.

DEQ concurs with the conclusion of the Phase II ESA report that accumulated water in observation well OB Well SW appears to have been impacted locally by spillage of petroleum fuel during transfer from a fueling truck, possibly due to a leaking fill port spill bucket. There is no indication that a petroleum fuel release occurred from the underground components of the UST system. DEQ concludes that the reported incident does not constitute a LUST release and administrative closure of LUST file No. 26-23-0486 is warranted.

It is recommended that the incident be referred to the DEQ UST program due to possible malfunctioning of a fill port spill bucket(s).