



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Northwest Region
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5696
FAX (503) 229-6124
TTY 711

October 3, 2023

Marc Nelson Oil Products, Inc.
Attn: Peter Nelson
1977 Claxter Road NE
Salem, OR 97301-0388

RE: No Further Action Determination
for Canby 2nd Ave. Pacific Pride property, Canby, OR
LUST No. 03-21-1208

Dear Mr. Nelson:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information for the Canby 2nd Ave. Pacific Pride property, including the closure report entitled *Risk-Based Closure Report* dated December 15, 2022, which was submitted to DEQ by HydroCon LLC on your behalf. The Canby 2nd Ave. Pacific Pride property address is 640 Southwest 2nd Avenue in Canby, Oregon 97013, also described as Tax Lot 6500 on Clackamas County Map 31E33CC.

DEQ has determined that remedial action to address environmental contamination at the Canby 2nd Ave. Pacific Pride property is complete and no further action is required. This determination is a result of our evaluation and judgment based on the DEQ regulations and the facts as we now understand them including the following:

- The property is currently developed with a Pacific Pride cardlock fueling facility.
- A Phase II Environmental Site Assessment was conducted in September 2021 to characterize the soil and groundwater conditions at the site. Six soil samples were collected at depths ranging from 14 to 39 feet below ground surface (bgs). Three grab groundwater samples were collected from three of the soil borings.
- Gasoline-range petroleum hydrocarbons, diesel-range petroleum hydrocarbons, and lead were detected in two soil samples (GP-4 and GP-5) at concentrations less than applicable risk-based concentrations (RBCs). Pyrene was also detected in one soil sample (GP-5) at a concentration less than applicable RBCs.
- Total lead was detected in all three groundwater samples (GP-1, GP-4, and GP-6); dissolved lead was detected in two groundwater samples (GP-4 and GP-6); and naphthalene was detected in one groundwater sample (GP-6). All detected analytes were detected at concentrations less than the applicable RBCs.
- Local groundwater is anticipated to be about 40 feet bgs and to flow towards the southwest. The property and surrounding areas are supplied with drinking water by the municipal water system. A water well query was conducted, and two water supply wells were identified over 1,000 feet downgradient of the site. Both wells are completed to a depth of over 200 feet bgs. As a result, site groundwater has no current or likely future beneficial use as drinking water.

- The property and surrounding areas are zoned for commercial use. The property is currently developed with a Pacific Pride cardlock fueling facility and is reasonably likely to continue to operate as a fueling facility in the future. Therefore, the following potential receptors are occupational workers and construction or excavation workers.
- The site is devoid of habitat with the exception of minor landscaping. The nearest surface water body is the Molalla River located approximately 0.5 miles to the west of the site. Wetlands associated with the floodplains of the Molalla River are located approximately 650 feet northwest of the site. Based on the depth and low concentrations in the soil, ecological receptors in the area are unlikely to be impacted.
- No ecological or human health risks were identified because all impacted soil and groundwater contain concentrations below applicable RBCs.

Based on the available information, soil conditions at the Canby 2nd Ave. Pacific Pride property are currently protective of public health and the environment in accordance with Oregon environmental cleanup law, Oregon Administrative Rules 340-122-0205 through 340-122-0360. The site requires no further action unless new or previously undisclosed information becomes available, or there are changes in site development or land and water uses, or more contamination is discovered. DEQ has updated the Leaking Underground Storage Tank (LUST) database to reflect this decision.

This letter only applies to the release discussed above. If any contaminated media is encountered in the future, it must be handled and disposed of in accordance with local, state, and federal regulations.

A copy of the HydroCon Risk-Based Closure Report supporting this No Further Action decision can be viewed at the DEQ LUST database under the LUST number [03-21-1208](#). DEQ recommends keeping a copy of all documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Rebecca Digiustino at (503) 926-2257 or via email at rebecca.digiustino@deq.oregon.gov.

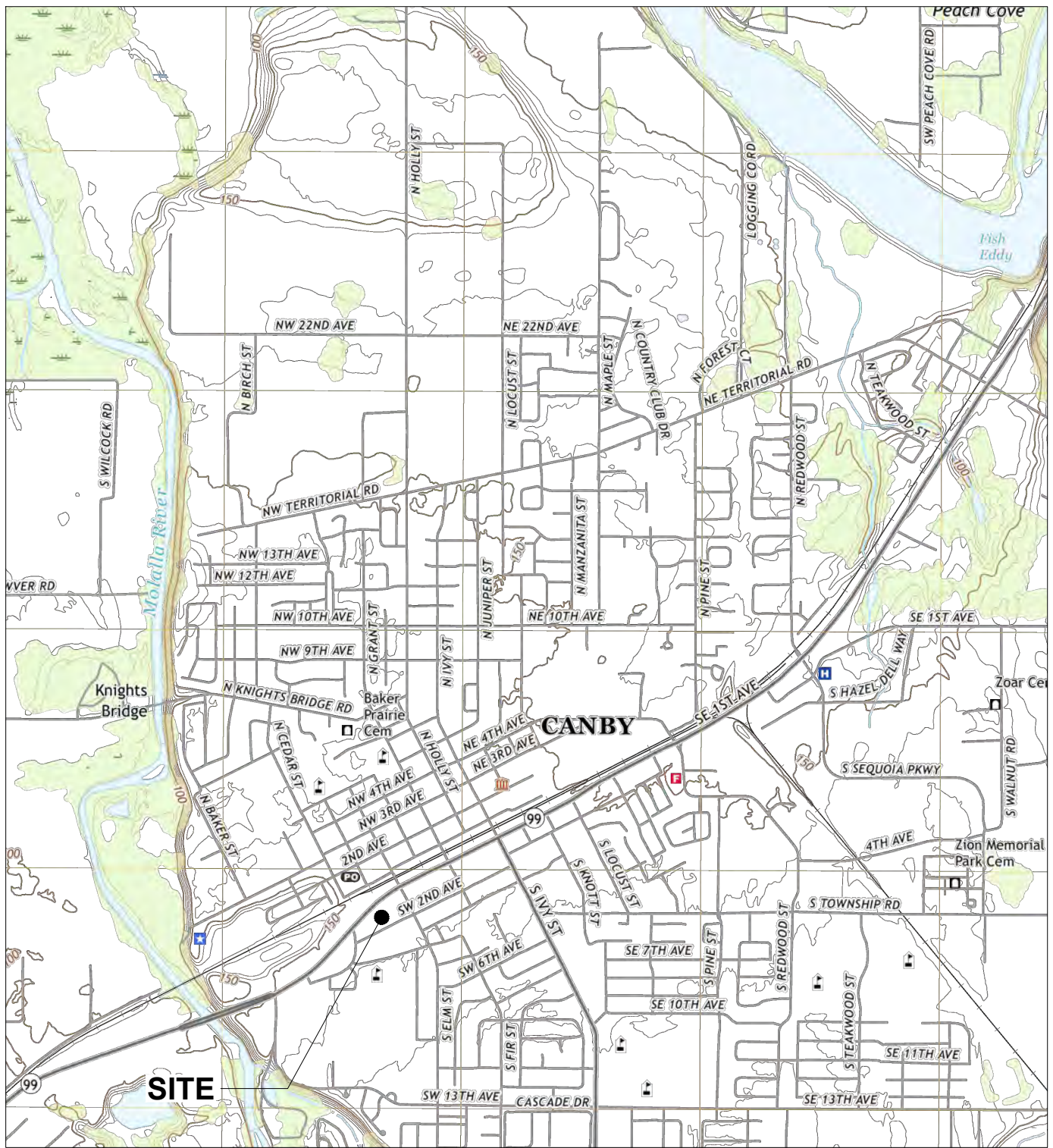
Sincerely,



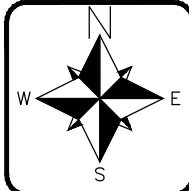
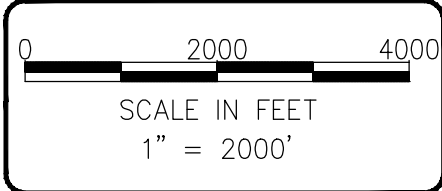
Kevin Parrett, Manager
Northwest Region Cleanup Section

Attachment(s): Site Location Map
Site Features and Sample Locations
Table 1
Table 2

cc: Rebecca Digiustino, DEQ
Chris Sheridan, HydroCon
LUST 03-21-1208 Fil



NOTE(S):
 USGS, CANBY QUADRANGLE,
 OREGON
 7.5 MINUTE SERIES (TOPOGRAPHIC)



314 W 15th Street, Suite 300, Vancouver, Washington 98660
 Phone 360.703.6079 Fax 360.703.6086





DATE: 12-9-2022
 DWN: LC
 CHK: CD
 APPROVED: CD
 PRJ. MGR: CD
 PROJECT NO:
 2021-082

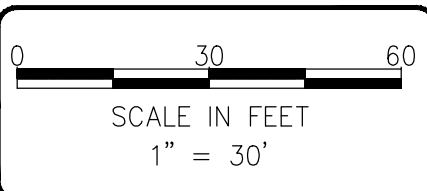
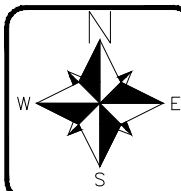
FIGURE 1
 SITE LOCATION MAP
 RISK BASED CLOSURE
 MARK NELSON OIL PRODUCTS
 640 SW 2ND AVENUE
 CANBY, OREGON

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Legend

-  Subject Site Property Boundary (Approximate)
-  GP-2 Soil Boring Location
-  GP-1 Soil Boring Location (Temporary Well)
-  Groundwater Flow Direction (Estimated)



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FIGURE 2
 SITE FEATURES AND SAMPLE LOCATIONS
 RISK BASED CLOSURE
 MARK NELSON OIL PRODUCTS
 640 SW 2ND AVENUE
 CANBY, OREGON



Table 1 - Summary of Soil Analytical Results
 MNOP Canby Pacific Pride
 640 SW 2nd Avenue
 Canby, Oregon

Sample Identification	Sample Depth (feet bgs)	Sample Date	Soil Analytical Results in mg/kg								
			GRPH	DRPH	ORPH	Benzene	Toluene	Ethylbenzene	Xylenes, Total	Lead	Pyrene
GP-1-14.5'	14.5-15	09/22/21	<5.06	<25	<50	<0.01	<0.051	<0.025	<0.076	--	--
GP-2-14'	14-14.5	09/22/21	<6.01	<25	<50	<0.012	<0.06	<0.03	<0.09	--	--
GP-3-14.5'	14.5-15	09/22/21	<5.52	<25	<50	<0.011	<0.055	<0.028	<0.083	--	--
GP-4-43'	43-43.5	09/22/21	32.3	125	<50	<0.01	<0.048	<0.024	<0.072	4.68	<0.011
GP-5-24.5'	24.5-25	09/22/21	7.59	399	<50	<0.013	<0.063	<0.032	<0.095	4.02	0.045
GP-6-38.5'	38.5-39	09/22/21	<6.76	<25	<50	<0.014	<0.068	<0.034	<0.10	--	--
Applicable DEQ Risk-Based Concentrations¹											
Vapor Intrusion into Buildings (RBC_{si})											
Occupational			>Max	>Max	>Max	2.1	>Csat	17	>Csat	--	>Max
Volatilization to Outdoor Air (RBC_{so})											
Occupational			69,000	>Max	>Max	50	>Csat	160	>Csat	--	>Max
Soil Ingestion, Dermal Contact, and Inhalation (RBC_{ss})											
Occupational Worker			20,000	14,000	36,000	37	88,000	150	25,000	800	23,000
Construction Worker			9,700	4,600	11,000	380	28,000	1,700	20,000	800	7,500
Excavation Worker			>Max	>Max	>Max	11,000	770,000	49,000	560,000	800	210,000

NOTES:

bgs = below ground surface

Chemical analyses performed by APEX Labs of Tigard, Oregon.

Gasoline-Range Total Petroleum Hydrocarbons (GRPH) analyzed by Northwest Method NWTPH-Gx.

Diesel-Range Total Petroleum Hydrocarbons (DRPH) analyzed by Northwest Method NWTPH-Dx.

Oil-Range Total Petroleum Hydrocarbons (ORPH) analyzed by Northwest Method NWTPH-Dx.

BTEX + Naphthalene analyzed by EPA Method 8260D.

¹Oregon Department of Environmental Quality (DEQ). Risk-Based Decision Making for the Remediation of Petroleum-Contaminated Sites.

mg/kg = milligrams per kilogram (parts per million)

Bold indicates analyte detection above laboratory method reporting limit (MRL)

RED denotes concentration exceeds applicable risk-based concentration (RBC)

"<6.09" indicates the analyte was not detected above the MRL.

>Csat = this soil RBC exceeds the limit of three-phase equilibrium partitioning.

>Max = this constituent RBC for this pathway is calculated as greater than 1,000,000 mg/kg. Therefore, this substance is deemed to not pose risks in this scenario.

* - Sample flagged as results for diesel range is due to overlap from gasoline range product.



Table 2 - Summary of Grab Groundwater Analytical Results
 MNOP Canby Pacific Pride
 640 SW 2nd Avenue
 Canby, Oregon

Well Identification	Sample Date	Groundwater Analytical Results in µg/L									
		GRPH	DRPH	ORPH	Benzene	Toluene	Ethylbenzene	Xylenes, Total	Total Lead	Dissolved Lead	Naphthalene
GP-1	09/22/21	<100	<194	<388	<0.2	<0.1	<0.5	<1.5	10.1	<0.2	<0.83
GP-4	09/22/21	<100	<220	<440	<0.2	<0.1	<0.5	<1.5	32.7	0.26	<0.86
GP-6	09/22/21	<100	<220	<440	<0.2	<0.1	<0.5	<1.5	7.04	0.23	0.082
Applicable DEQ Risk-Based Concentrations¹											
Vapor Intrusion into Buildings (RBC_{wi})											
Occupational	>S	>S	>S	2,800	>S	8,200	>S	--	--	11,000	
Volatilization to Outdoor Air (RBC_{wo})											
Occupational	>S	>S	>S	14,000	>S	43,000	>S	--	--	16,000	
Groundwater in Excavation (RBC_{we})											
Cons. & Exc. Worker	14,000	>S	>S	1,800	220,000	4,500	23,000	--	--	500	

NOTES:

Chemical analyses performed by APEX Labs of Tigard, Oregon.

Gasoline-Range Total Petroleum Hydrocarbons (GRPH) analyzed by Northwest Method NWTPH-Gx.

Diesel-Range Total Petroleum Hydrocarbons (DRPH) analyzed by Northwest Method NWTPH-Dx.

Oil-Range Total Petroleum Hydrocarbons (ORPH) analyzed by Northwest Method NWTPH-Dx.

RBDM Compunds analyzed by EPA Method 8260CD

¹Oregon Department of Environmental Quality (DEQ). Risk-Based Decision Making for the Remediation of Petroleum-Contaminated Sites.

µg/L = micrograms per liter (parts per billion)

Bold indicates analyte detection above MRL.

RED denotes concentration exceeds applicable RBC

"<100" indicates the analyte was not detected above the laboratory reporting limit.

>S = this groundwater RBC exceeds the solubility limit.