



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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February 9, 2024

Mark Sirois, HCD Manager
Housing and Community Development Division – Community Preservation
Clackamas County Health, Housing and Human Services Department
2051 Kaen Road Suite 245

RE: No Further Action Determination
Clackamas Industrial Opportunity Area II
16590 SE 114th Avenue
Clackamas, Oregon
ECSI #6107

Dear Mr. Sirois:

The Oregon Department of Environmental Quality (DEQ) reviewed the available information for the above referenced property, including a February 6, 2024, *Environmental Site Cleanup Report*, prepared by Alpha Environmental. Clackamas County records show the subject property is listed as tax lot 22E15A 01200. DEQ has determined that investigation to address environmental contamination related to two former maintenance areas is complete, and no further action is required. This determination is based on the DEQ regulations and the facts as we now understand them including, but not limited to the following:

- The Site covers 3.85 acres. The northern portion of the Site is generally flat. The southern portion of the Site drops relatively steeply to its southern boundary, which is approximately 40 feet lower in elevation. The southern Site boundary coincides with Lithgow Creek, a tributary to the Clackamas River. The Site was developed with a structure in 1948. Over time, a series of residential structures and outbuildings existed on the northern part of the property. From 2006 to 2009, this area was used for parking area of semi-trucks and trailers, which continued until around 2020. Based on aerial photographs and prior site investigations, two distinct areas were used for vehicle maintenance and designated “Former Tractor-Trailer Maintenance Area” (40’x70’) and “Hobby Maintenance Area” (40’x40’). By 2020, all structures had been removed, and the Site remains vacant except for scattered trees and vegetation.
- The cause of contamination at the Site appears to be from vehicle maintenance activities. It appears that undocumented fill was placed in several areas of the Site. Thirteen test pits were advanced to total depths of four to eight feet. Sand, sandy gravel, and cobbles were encountered in the test pits. No evidence was observed of petroleum contamination, metal or trash in the test areas. Based on this, DEQ did not require additional investigation or soil testing of fill material.
- Soil in the Former Tractor-Trailer Maintenance Area was impacted by petroleum hydrocarbons to a depth of 1 foot. Petroleum contamination in the Former Hobby Maintenance Area extended to depths between 1 and 3 feet.
- In December 2023, the two impacted areas were excavated to approximately one foot in the Former Tractor-Trailer Maintenance Area and approximately one to three feet in the Former Hobby Maintenance Area. All excavations continued until there were no visual signs of impacts observed. Approximately 135 tons of soil were removed for disposal in a permitted landfill.
- Nine confirmation soil samples were collected from the bottom of the excavations to verify the removals were protective of human health. All samples were analyzed for petroleum hydrocarbons and polycyclic aromatic hydrocarbons (PAHs). Two samples from each area were analyzed for polychlorinated biphenyls (PCBs). Heavy oil range hydrocarbons were detected in eight of nine samples, at concentrations ranging from 53.5 to 594 milligrams per kilogram

(mg/kg). Diesel range hydrocarbons were detected in one of nine samples at a concentration of 58.3 mg/kg. PAHs were detected at low levels. PCBs were not detected.

- The Site property is zoned General Industrial (GI). The property is vacant. The future use of the northern part of the property is anticipated to be used for temporary veteran housing. The southern part is anticipated to remain open space.
- Beneficial water use information is based on prior work on an adjacent DEQ project to the east (see ECSI #1526). The shallow aquifer is perched on fine-grained beds within Pleistocene fluvial deposits. Depth to water in the shallow aquifer is typically 8 to 10 feet below ground surface (bgs) during the wet season but is largely absent during drier months of fall and summer. The deeper water bearing zone occurs within the Troutdale Formation at depths of about 30 to 70 feet bgs. The deep aquifer provides a beneficial use for drinking water and industrial purposes, and recharge to the Clackamas River. A municipal water supply is readily available. A 67-foot-deep domestic use well formerly was present in the central Site area, but was property abandoned in 2023 (see well log CLAC 78284 in Oregon Water Resource Department records). There are no known groundwater supply wells being used on the subject property or surrounding properties.
- Direct contact with soil by occupational, construction or excavation workers is the primary pathway of concern. There are no structures, so volatilization from soil into buildings is not a currently complete pathway. Given the non-volatile and low-level nature of residual contamination, vapor intrusion is not reasonably likely to be a complete pathway in the future. Groundwater is not used for domestic or industrial use at the property and is not expected to be used in the future.
- Lithgow Creek generally coincides with the southern Site boundary. The northern part of the Site corresponding to the flatter upland area has been altered by infilling and grading but provides some ecological habitat. The slope leading down to the creek is heavily vegetated and provides good terrestrial habitat. Given the low levels of residual contamination at the Site, a formal ecological risk screening was not required by DEQ.
- Confirmation sampling beneath each soil removal area showed residual contamination below applicable DEQ risk-based concentrations (RBCs). Given the limited depth of contamination groundwater is not expected to be impacted.

Based on the available information, the Site requires no further action under the Oregon Environmental Cleanup Law, ORS 465.200 et seq. unless new or previously undisclosed information becomes available, there are changes in Site development or land and water uses, or contamination is discovered. Site information and reports supporting this No Further Action decision can be viewed at:

[Documents for ECSI 6107 - 16590 SE 114TH Avenue](#)

DEQ recommends keeping a copy of all the documentation associated with this evaluation with the permanent facility records. If you have any questions, please Mark Pugh at 503 229-5587 or mark.pugh@deq.oregon.gov.

Sincerely,



Kevin Parret, Manager
Northwest Region Cleanup Program

e-copy: Jim Cooper, Alpha Environmental