



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region

165 E 7th Ave., Suite 100

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October 18, 2023

Walt Davenport
Jackson County School District #6
615 S 2nd Street
Central Point, OR 97502

RE: **Conditional** No Further Action Determination
for Rogue Primary School, Central Point,
ECSI #6520

Dear Walt Davenport:

The Oregon Department of Environmental Quality has completed a review of the available information for the Rogue Primary School property, including the closure report entitled *Cleanup and Risk-Based Assessment of Rogue Primary School* dated January 4, 2023, which was submitted to DEQ by Coleman Creek Consulting, Inc. on your behalf. The Rogue Primary School address is 615 S. 2nd Street, Central Point, OR 97502, Jackson County map and tax lot 372W11BC 5200 (Figure 1).

DEQ has determined that remedial action to address environmental contamination at Rogue Primary School is complete, and no further action is required, with conditions: A contaminated media management plan for the site is required and must be followed during any site improvement or construction activities. 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, and as more fully described in DEQ's Staff Memo dated February 15, 2023:

- A concrete vault that was used to store petroleum products and a used oil pan were discovered during site construction activities for a new school building in March and April 2022. The remains of the concrete vault and oil pan, their contents, and surrounding petroleum contaminated soil were excavated and disposed of offsite at Dry Creek Landfill.
- The site is zoned Civic. City water is provided to the site and surrounding properties, and groundwater at the site is not expected to be used for water supply purposes in the future.
- Although the site is a non-residential facility, it is associated with an elementary school with children present. Thus, the most conservative risk screening levels (residential exposure scenario) were used for risk screening at this site.
- Concentrations of diesel in soil exceeded the risk-based concentration (RBC) for soil ingestion, inhalation and dermal contact for residential receptors. The location of the observed contamination is under the paved entrance to the site, however, and it is unlikely school children or workers will encounter this contamination (Figure 2).
- Concentrations of gasoline and naphthalene in soil exceeded RBCs for vapor intrusion into buildings and volatilization to outdoor air for residential receptors, however, soil gas sampling found concentrations of these chemicals below residential RBCs, thus there should be no unacceptable indoor or outdoor vapor exposure risk to school children or workers at the site.
- Concentrations of diesel in soil exceeded the RBC for ingestion, inhalation and dermal contact for construction workers working in soil deeper than 3.5 feet below ground surface (Figure 2).

- The highest concentration of diesel detected in groundwater exceeded the saturation limit for diesel, which is 6,800 micrograms per liter (Figure 3). Any concentration detected above this value indicates the potential presence of diesel free product in the subsurface.
- As depicted in the attached figures, residual soil and groundwater contamination extends west from the area of the concrete vault excavation and includes a portion of the South 1st Street right-of-way.
- A 30-day public comment period was held regarding this decision. The City of Central Point Public Works Department, utility providers, and the adjoining property owners were directly contacted to inform them of the remaining contamination and opportunity to comment. The City spoke with DEQ by phone on March 13, 2023, with concerns regarding the residual contamination onsite and in the right-of-way. DEQ responded to the City's comments via email on March 13, 2023. The public comment period was extended at the request of PacifiCorp, an electric power provider. PacifiCorp contacted DEQ by email on April 26, 2023, with questions regarding management of contaminated media. DEQ responded to PacificCorp's comments via email on April 27, 2023.
- As a condition for closure, an Easement and Equitable Servitude document was recorded on the property on August 31, 2023. The EES requires a Contaminated Media Management Plan (CMMP) for the site that must be followed during any site improvement or construction activities on the property. The CMMP was also provided to the city and utility providers with underground utilities in the right-of-way.

Based on the available information, soil, groundwater and soil gas conditions at Rogue Primary School are currently protective of public health and the environment in accordance with Oregon environmental cleanup law, ORS 465.200 et seq. 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 will update the Environmental Cleanup Site Information (ECSI) 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 Coleman Creek Consulting, Inc. closure report and DEQ's Staff Memo supporting this Conditional No Further Action decision can be viewed at <http://www.deq.state.or.us/lq/ecsi/ecsiquery.asp> (search for Site ID 6520). DEQ recommends keeping a copy of all of the documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Ellen Woods at 541-606-0490, or via email at ellen.woods@deq.oregon.gov.

Sincerely,

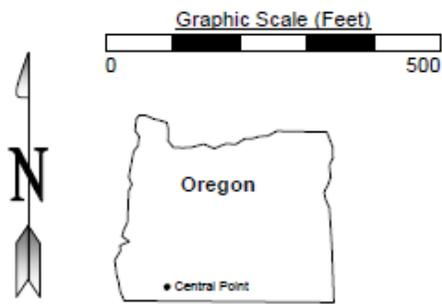
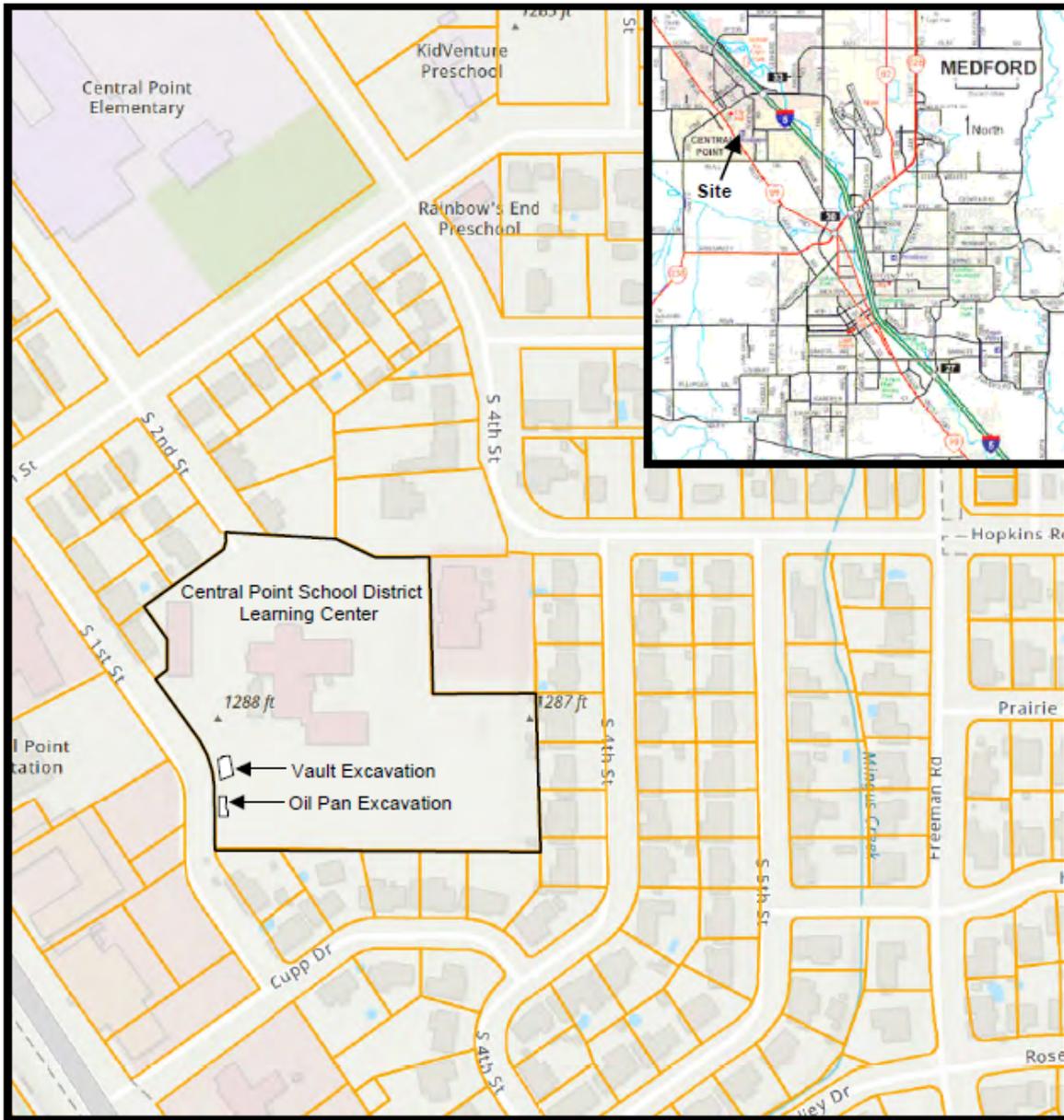
Peter Donahower

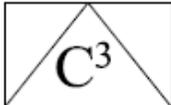
Peter Donahower, Manager
Petroleum Cleanup Section

Attachments: Vicinity Map; Estimated plume of residual diesel contamination in soil; Estimated plume of residual diesel contamination in groundwater

Ec: ORMS, ECSI6520 (with attachments)
Spencer Davenport, Jackson County School District #6, spencer.davenport@district6.org
Dave Fawcett, Coleman Creek Consulting, Inc., fawbro@ccountry.net

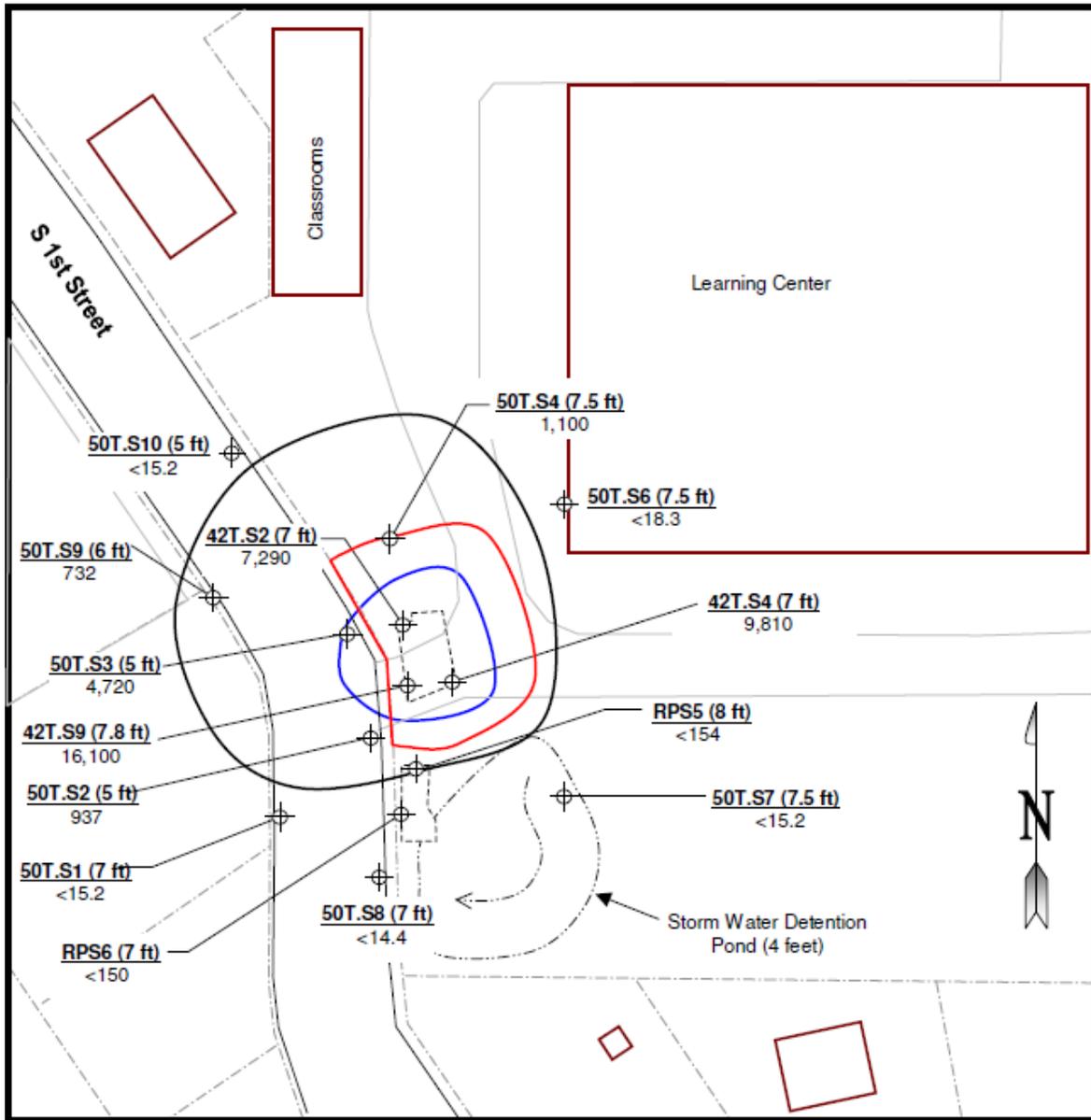
Figure 1. Vicinity map



615 S 2 nd Street Central Point, Oregon	
Figure 1: Location	
	Coleman Creek Consulting, Inc. 810 Leonard Street Ashland, Oregon 97520 541-535-7108
	Scale: See Graphic Date: October 5, 2022 Prepared by: RLG Source: Jackson County GIS, Official Oregon State Map, ODOT File: C:\CCC\625 S 2 nd St_CP\Location.doc

From *Cleanup and Risk-Based Assessment of Rogue Primary School*, Coleman Creek Consulting (2023)

Figure 2. Estimated plume of residual diesel contamination in soil

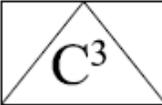


NOTES:
 All values in milligrams per kilogram (mg/Kg)
 < Contaminant was not detected at the Report Limit listed
 --- Property Line
 ⊕ Sample location
 ○ Impacted Soil (50 mg/Kg)
 ○ Residential RBCss (1,100 mg/Kg)
 ○ Construction Worker RBCss (4,600 mg/Kg)

Graphic Scale (Feet)
 0 50 100

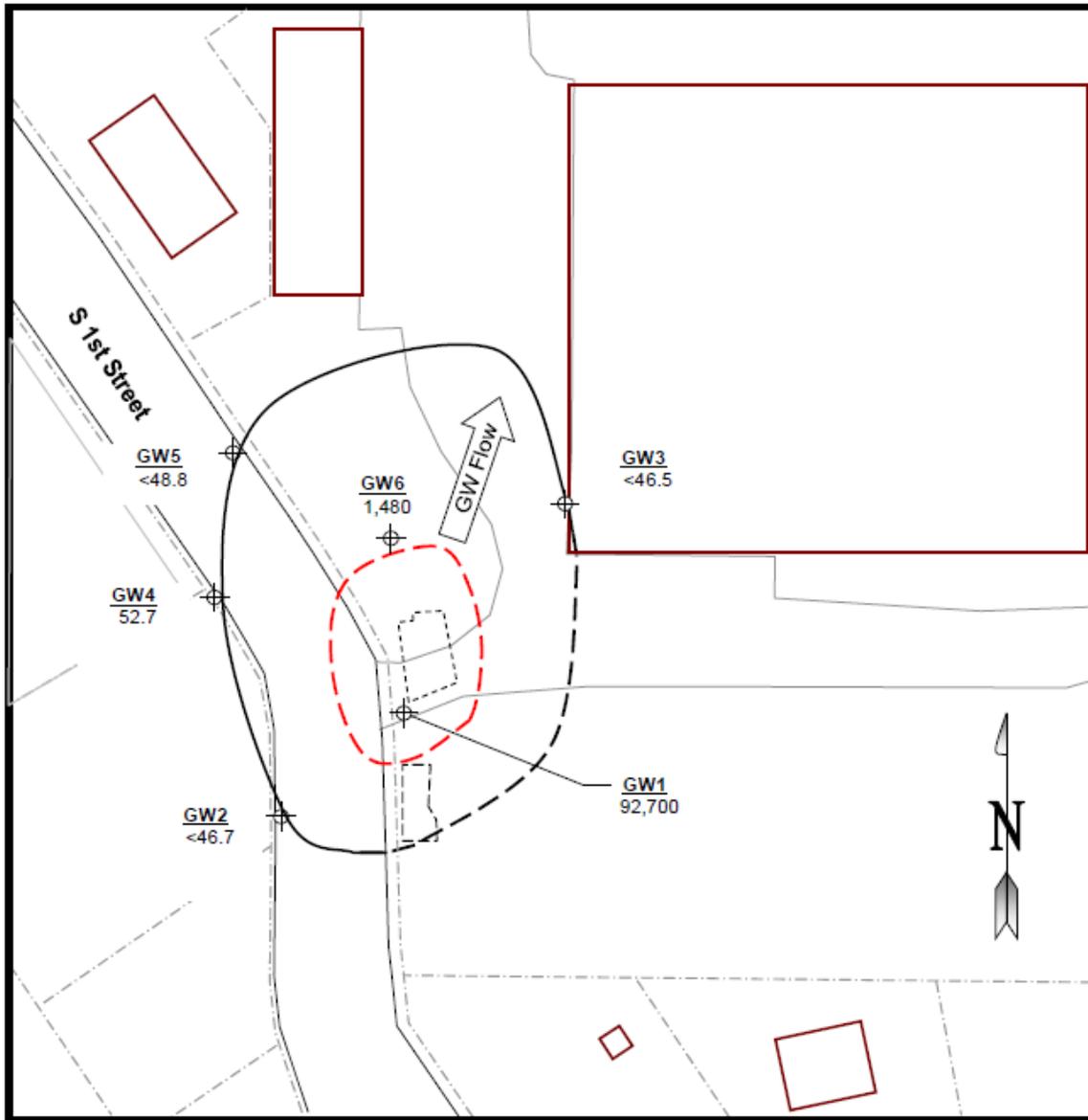
615 S 2nd Street
 Central Point, Oregon

Figure 5 : Diesel Range Hydrocarbons in Soil

	Coleman Creek Consulting, Inc. 810 Leonard Street Ashland, Oregon 97520 541-535-7108	Scale: See Graphic
		Date: January 4, 2023
		Prepared by: R.L.G.
		Source: Jackson County GIS, Site mapping
		File: C:\CC\625 S 2 nd St_CP\6520 D6.dwg

From *Cleanup and Risk-Based Assessment of Rogue Primary School*, Coleman Creek Consulting (2023)

Figure 3. Estimated plume of residual diesel contamination in groundwater



NOTES:
 All values in micrograms per liter (ug/l)
 Dashed boundary is estimated
 < Contaminant was not detected at the Report Limit listed
 - - - Property Line
 ⊕ Sample location
 ○ Impacted Groundwater (50 ug/l)
 ○ Generic Diesel Saturation Limit (6,200 ug/l)

615 S 2nd Street
 Central Point, Oregon

Figure 6 : Diesel Range Hydrocarbons in Groundwater

	Coleman Creek Consulting, Inc.	Scale: See Graphic
	810 Leonard Street Ashland, Oregon 97520 541-535-7108	Date: October 7, 2022
		Prepared by: RLG
		Source: Jackson County GIS, Site mapping
		File: C:\CC\625 S 2 nd St, CPWater Gnd.doc

From *Cleanup and Risk-Based Assessment of Rogue Primary School*, Coleman Creek Consulting (2023)