



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah St., Suite 600

Portland, OR 97232

(503) 229-5696

May 22, 2024

Jackie Wetzsteon
PacifiCorp
Environmental Policy and Strategy
825 NE Multnomah, Suite 2000
Portland, OR 97232

Nathan Blomgren
Chevron Environmental Management Company
5001 Executive Parkway, Suite 200
San Ramon, CA 94583

RE: Conditional No Further Action Determination
for PacifiCorp/Unocal Former Petroleum Terminal No. 0022 and Manufactured Gas Plant in
Astoria, ECSI #1646

Dear Ms. Wetzsteon & Mr. Blomgren:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information for the PacifiCorp/Unocal Former Petroleum Terminal No. 0022 facility, including the closure reports cited in the August 19, 2022 Request for Issuance of Conditional No Further Actions, which was submitted to DEQ by Arcadis and DOF on your behalf. The PacifiCorp/Unocal Former Petroleum Terminal No. 0022 and Manufactured Gas Plant facility includes:

- One city block located at 256 Marine Drive, Astoria, Oregon comprising Lots 1 through 8 of Block 2 of McClures, Astoria (the Property)
- Upland areas between the Property and the Columbia River, and
- An in-water area including the intertidal zone of the Columbia River north and northeast of the Property.

DEQ has determined that remedial action to address environmental contamination at PacifiCorp/Unocal Former Petroleum Terminal No. 0022 is complete, and no further action is required, conditioned upon adherence to restrictions recorded with the property through an Easement and Equitable Servitude agreement (EES). 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 March 21, 2024:

- Historical industrial use of the site included a manufactured gas plant (MGP) and a petroleum storage and distribution terminal.
- Contamination sources are from surface and subsurface spills or leaks from the former MGP and petroleum storage and distribution terminal operations, including sources of PAHs, diesel range organics, cyanide, metals and volatile organic compounds.
- The impacted media are soil, sediment, groundwater and surface water.
- In 1987, contaminated soil was removed and replaced with clean fill. In 2018, an upland cap was completed. In 2020, an in-water cap construction was completed. LNAPL recovery from monitoring wells began in 2002 and is ongoing.

- Contaminated soil, shallow groundwater, and LNAPL remain under portions of the upland and in-water caps.
- Reasonably anticipated short-term future land use at the site is commercial/industrial, though redevelopment to residential use may be allowed as a conditional use under current zoning. The lower reach of the Columbia River is north of the site, just upstream of Youngs Bay. Current uses of this portion of the Columbia River include ecological habitat, transportation, recreation, commercial and subsistence fishing, and irrigation.
- Complete human health pathways include the following: soil ingestion, dermal contact, and inhalation for all on-site receptors; groundwater incidental ingestion for excavation and construction workers, dermal contact and inhalation and air inhalation for potential occupational workers. Complete ecological exposure pathways include groundwater ingestion, dermal contact and gill uptake for aquatic organisms.
- The upland cap prevents direct contact with contamination in soil and shallow groundwater, including LNAPL. The in-water remedy prevents LNAPL from discharging to sediment and the cap prevents contact with impacted sediments.
- The 45-day public comment period for the CNFA started on April 1, 2024, and closed May 15, 2024, at 5:00pm. No public comments were received.
- Institutional controls for capped areas will be maintained through an Easement and Equitable Servitude agreement (EES) with a Contaminated Material Management Plan (CMMP) to address future subsurface maintenance or site redevelopment activities. Upland and in-water caps shall be maintained in accordance with their respective Operation, Monitoring, and Maintenance Plans. Upland LNAPL monitoring and removal will continue according to the adaptive management approach established in the LNAPL Pilot Scale Study and Recovery Report (Arcadis 2014). The EES prohibits use of shallow groundwater for consumption or other beneficial uses, and on-Property building construction without installation of a vapor barrier. An DEQ-approved investigation of the soil gas to indoor air pathway is required to remove this restriction.

Based on the available information, soil, sediment, groundwater and surface water conditions at PacifiCorp/Unocal Former Petroleum Terminal No. 0022 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 Your DEQ Online (YDO) database to reflect this decision.

This letter only applies to the release(s) 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. Monitoring wells that are not related to ongoing monitoring should be maintained or decommissioned in accordance with Oregon Water Resources Department regulations.

A copy of the relevant reports, including the EES, CMMP, approved monitoring plans and DEQ's Staff Memo supporting this Conditional No Further Action decision can be viewed at: https://ormswd2.synergydcs.com/HPRMWebDrawer/Record?q=webdrawercode%3A%22*082*%22+And+recAnyWord%3A%22ECSI1646%22&sortBy=recTypedTitle-. DEQ recommends keeping a copy of all the documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Sara Krepps at 503-956-9363, or via email at sara.krepps@deq.oregon.gov.

Sincerely,



Amanda Wozab, Manager
Northwest Region Cleanup Section

Attachment(s): Site Map
CMMP
EES

cc: Erin McDonnell, DEQ
Mike Romero, DEQ
Eric Epple, Arcadis
Rob Webb, DOF
Anna St. John, Bridgewater
Nathan Blomgren, Chevron
Kristopher Byrd, WRD
ECSI #1646 File