



Oregon

Tina Kotek, Governor

Department of Environmental Quality
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June 14, 2024

Peter Nelson
Marc Nelson Oil Products, Inc.
PO Box 7135
Salem, OR 97303-0024

RE: No Further Action Determination
for Idanha Cardlock, Idanha
LUST #24-21-1203

Dear Peter Nelson:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information for the Idanha Cardlock site, including the closure report entitled *Risk-Based Closure Report* dated February 24, 2022, which was submitted to DEQ by HydroCon, LLC on your behalf. The Idanha Cardlock address is 1477 N Santiam Hwy, Idanha, OR 97350, Marion County Map and Tax Lot 106E17B000200 (Figure 1).

DEQ has determined that remedial action to address environmental contamination at the Idanha Cardlock 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, and as more fully described in DEQ's Staff Memo dated July 24, 2023:

- The site is zoned for industrial land use and includes various features: an active cardlock fueling facility with a dispenser island, several warehouses immediately north and northwest of the cardlock, two residential mobile homes approximately 300 feet east of the cardlock, and a coffee stand approximately 20 feet south of the cardlock. A water supply well located in the northwest corner of the site and provides water to the site (Figure 2).
- The fueling operation includes two 10,000-gallon gasoline underground storage tanks (USTs), one 8,000-gallon diesel UST and one 12,000-gallon diesel UST.
- Four soil borings were advanced at the site in September 2021 as a part of a due diligence Phase II Environmental Assessment. The borings were advanced in the vicinity of the USTs and dispenser island of the cardlock facility (Figure 2).
- Laboratory results for the shallow soil sample collected west of the dispenser island showed detections of oil-range total petroleum hydrocarbons and polycyclic aromatic hydrocarbons. The contamination is suspected to be from historic surface spill(s). Contamination was not detected in the samples collected from the other boring locations.
- Groundwater was not encountered at the site and evidence of subsurface soil contamination deeper than 2.5 feet below ground surface was not observed. This suggests that groundwater at the site has not been impacted by the residual contamination in soil.
- The concentration of oil observed in shallow soil exceeds the DEQ's risk-based concentration for soil ingestion, dermal contact, and inhalation by residential receptors. Residential exposure to the

contamination is unlikely, however, given that the contamination was observed in the area of the site used as the cardlock facility, where residents do not occupy or otherwise use the site.

- There is no public water supply available for the site or the immediate vicinity. All domestic and industrial use wells identified within 0.5 miles of the site, including the well that supplies the site and west-adjacent property, are located upgradient of the cardlock fueling area and are unlikely to be impacted by the contamination.
- There is no unacceptable human health risk at the site. No risk-based concentrations were exceeded for occupational, construction or excavation workers who may come into contact with contaminated soil currently or in the likely future.
- The site is in the North Santiam River Valley and is surrounded by steep forested terrain to the north and the North Santiam River approximately 330 feet to the southwest. The potential for contaminated groundwater to impact offsite surface water bodies is low, due to the depth of the observed contamination. Additionally, there is no terrestrial habitat at the site and there is not expected to be in the future. Contaminated soils are limited to the site and do not extend onto the forested terrain north of the site. Thus, there is no unacceptable ecological risk at the site.

Based on the available information, soil and groundwater conditions at Idanha Cardlock 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 will update the Leaking Underground Storage Tank (LUST) database to reflect this decision.

This letter only applies to the petroleum 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. Monitoring wells should be maintained or decommissioned in accordance with Oregon Water Resources Department regulations.

A copy of the HydroCon, LLC closure report and DEQ's Staff Memo supporting this No Further Action decision can be viewed at <https://ordeq-edms-public.govonlineas.com/pub/pub-rcd/projects> (search 24-21-1203 under Keywords). 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 Ellen Woods at 541-606-0490, or via email at ellen.woods@deq.oregon.gov.

Sincerely,

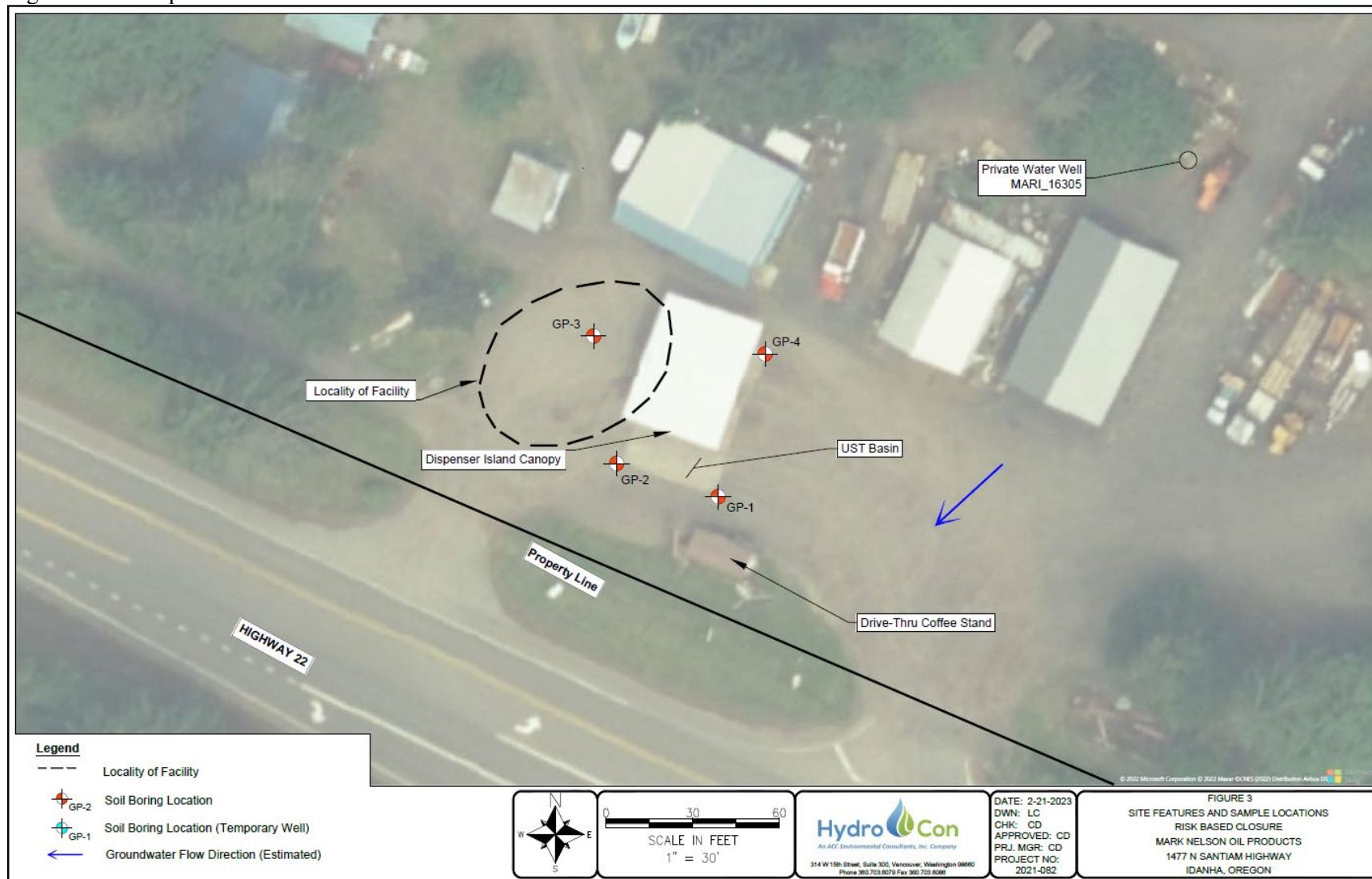
Peter F Donahower

Peter Donahower, Manager
Petroleum Cleanup Section

Attachments: Figure 1. Vicinity map
Figure 2. Site map

EC: ORMS LUST24-21-1203 (with attachments)
Christopher Daschel, HydroCon LLC, ChrisD@hydroconllc.net
Bruce Scherzinger, Oregon DEQ, bruce.scherzinger@deq.oregon.gov

Figure 1. Site map



From Risk-Based Closure Report, HydroCon, LLC, February, 24 2023.