



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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July 24, 2024

David A. Brown
Shell Legacy Holdings LLC
150 N. Dairy Ashford
Houston, TX 77079

RE: **Conditional** No Further Action Determination
Astoria Area-Wide Petroleum Site – Area of Concern 2
Former Shell Oil Facility
Astoria, Oregon
DEQ ECSI File No. 2277
Order ECSR-NWR-01-11

Dear David A. Brown:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information, including a June 25, 2012 report entitled *Soil Gas Sampling Report and Request for No Further Action*, prepared on your behalf by Hart Crowser. The former Shell Oil Facility (Site) is located at the Port of Astoria, Oregon, and covers approximately 0.7 acres in the southeast portion of tax lot 810130000100 in Clatsop County, Township 8 North, Range 9 West, Section 7 Willamette Base and Meridian.

DEQ has determined that remedial action to address environmental contamination at the Site is complete, and no further action is required with the adoption of institutional controls. 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 operated as a bulk fuel storage and distribution facility equipped with seven above ground fuel storage tanks and fuel pipelines from 1925 to 1972.
- Petroleum hydrocarbon contamination due to historic releases from the fuel storage tanks, pipelines and other inadvertent releases during Site operations impacted Site soil and groundwater.
- By 1974, all above ground tanks and pipelines were decommissioned. Interim removal measures at the Site included the investigation and decommissioning of subsurface pipelines by 2004. A soil and groundwater investigation was completed in 2008. A soil vapor investigation was completed in 2012.
- Residual soil and groundwater contamination remains in place.
- The Site is owned by the Port of Astoria and zoned Marine Industrial Shorelands, S-1. Residential land use is not a reasonably likely future use.
- A public notice of the 30-day comment period was published in the Astorian and the Oregon Secretary of State's Bulletin on September 30, 2023. DEQ addressed the comments in the staff memo.
- Site conditions are protective of human health and the environment provided the DEQ-approved Contaminated Media Management Plan (CMMP) is implemented by excavation and construction workers.

- A Site-specific construction and excavation worker Health and Safety Plan (H&S Plan) should be developed and implemented prior to initiation of intrusive activities.
- The need for implementation of the CMMP and H&S Plans will be recorded in the Port Layout Plan for Port of Astoria.

Based on the available information, the former Shell Oil Facility is currently protective of public health and the environment provided the institutional controls listed above are implemented. 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, or there are changes in site development or land and water uses, or more contamination is discovered. DEQ has updated the [Former Shell Oil Facility Public File](#) to reflect this decision.

Any remaining monitoring wells should be maintained or decommissioned in accordance with Oregon Water Resources Department regulations.

The June 25, 2024 staff memorandum and other reports supporting this No Further Action decision can be viewed at [former Shell Oil Facility web documents](#). 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 Mark Pugh, DEQ Project Manager at 503-229-5587 or mark.pugh@deq.oregon.gov.

Sincerely,



Kevin Parrett, Manager
Northwest Region Cleanup Section

cc: Mark Pugh, DEQ
Heather Gadwa, GHD
Will Isom, Port of Astoria