

State of Oregon
Department of Environmental Quality

Memorandum

Date: August 19, 2024

To: FILE

Through: Brad Shultz, Manager
Western Region Environmental Cleanup

Don Hanson, RG, Lead Worker
Western Region Environmental Cleanup

From: Sarah Eagle, Project Manager
Western Region Environmental Cleanup

Subject: Truck N Travel II and Travel N Travel III, LUST #20-19-0730 and 20-20-1049;
Staff Memorandum in support of a No Further Action determination

This document presents the basis for the Oregon Department of Environmental Quality's (DEQ's) recommended No Further Action (NFA) determination for the Truck N Travel II and Truck N Travel III site, in Coburg. As discussed in this report, contaminant concentrations in soil and groundwater are below acceptable risk levels.

The proposed NFA determination meets the requirements of Oregon Administrative Rules Chapter 340, Division 122, Sections 0205 to 360 and ORS 465.200 through 465.455.

The proposal is based on information documented in the administrative record for this site. A copy of the administrative record index is presented at the end of this report.

1. BACKGROUND

Site location.

The site's location can be described as follows:

- Address: 32910 E Pearl St, Coburg, Lane County, Oregon.
- Latitude 44.1366° North, longitude 123.0567° West
- Tax lot(s) 2900, Township 16 South, Range 3 West, Section 33

Site setting.

The site is located on a 4.24 acre lot located off Pearl Street in Coburg. The site is almost entirely paved and is used as a truck stop, including a fueling station and restaurant, and also includes a motel building which is not operational and is planned for demolition in the near future. Two other adjacent tax lots are also associated with the site and contain paved and gravel areas and auxiliary structures related to the primary use of the site. Together the three tax lots are 16.47

acres. Beyond these three tax lots, there is residential use to the north beyond Pearl Street, an RV park to the south, and a fast-food restaurant and service station to the east.

Physical setting.

The site is approximately 395 feet above sea level and topography is generally flat. Depth to groundwater during January 2024 sampling events was observed to be 7 feet bgs. Geology consists of unconsolidated sediments, primarily silty sands and poor graded gravels but also zones of silty clays. The groundwater flow direction is anticipated to be to the north and northwest. The McKenzie River is located 1.4 miles to the south and the Willamette River is 2.7 miles west. There are also drainage or irrigation ditches along adjacent S. Stuart Way and Coburg Industrial Way.

Site history.

The site has been used as a truck stop and fueling station for decades and historical petroleum infrastructure includes a diesel above ground storage tank (AST) on the southeast portion of the site, several underground storage tanks (USTs) on the far northeast portion, and five USTs, split between two nests, south of the present-day dispenser island.

Two historical releases are noted in DEQ's records:

- In March 1993, DEQ was notified of a petroleum release from the Truck-N-Travel site, generating LUST 20-93-4034. The release of diesel was associated with failure of one of five 12,000-gallon USTs south of the present-day dispenser island. There was also a separate release of diesel from the AST which was located in the southeast corner of the property near an auxiliary building. In November and December of 1994, the USTs were decommissioned and replaced by three 20,000-gallon diesel USTs. A No Further Action determination was issued for LUST 20-93-4034 on October 14, 1996.
- In December 2009, a gasoline and diesel release was discovered at the north end of the site near Pearl Street, which resulted in DEQ opening LUST number 20-09-1313. In November 2013 DEQ issued a No Further Action determination for this release.

In July 2019, during the installation of a new biodiesel UST immediately south of the existing diesel USTs installed in 1994 (Figure 2), diesel was observed entering the excavation basin. The release was reported to DEQ and LUST 20-19-0730 was issued. The installation of the biodiesel UST was part of multiphase infrastructure updates that included replacement of the fuel dispensers, which occurred in July-August 2019, and replacement of the existing three USTs, which occurred in November 2020. During decommissioning and replacement of the three diesel USTs (originally installed in 1994) diesel was again observed entering the excavation basin. The second observation of free product was reported to DEQ and LUST 20-20-1049 was issued.

2. BENEFICIAL LAND AND WATER USE DETERMINATIONS

Land use.

The site and the two adjacent lots are zoned Highway Commercial by the city of Coburg. The zoning is primarily for commercial retail and service businesses. Residential use is permitted on upper floors only, though none of these lots are currently utilized as such nor is any residential use anticipated in the future.

Groundwater use.

There is no current use of groundwater on site or on the adjacent two properties as municipal water supply is used for the water source. There are some domestic wells on residential properties further to the north and west but are outside the expected area of contamination. Based on the zoning and land use, it is unlikely that shallow groundwater would be used in the future for domestic purposes within the area of contamination.

Surface water use.

The McKenzie River is located 1.4 miles to the south of the site and the Willamette River is 2.7 miles west. There are also drainage or irrigation ditches along adjacent S. Stuart Way and Coburg Industrial Way. The site surface is virtually all impervious cover and stormwater would be anticipated to flow to the adjacent ditches.

3. INVESTIGATION AND CLEANUP WORK

Several rounds of sampling were conducted from July 2019 to January 2024. During replacement of the fuel dispensers (July-August 2019), 13 soil samples and one groundwater sample were taken. This round of sampling included analysis for oil and diesel range hydrocarbons; benzene, toluene, ethylbenzene and xylenes (BTEX); and naphthalene. During the decommissioning and replacement of the three 20,000-gallon diesel USTs in November 2020, five soil samples were taken from the walls of the UST basin and one pit water sample was taken from within the UST basin. All samples were analyzed for diesel and gasoline range hydrocarbons, BTEX, and naphthalene. Lastly, for soil and groundwater delineation purposes in January 2024, ten soil samples and three groundwater samples taken from five borings were analyzed for diesel range hydrocarbons and BTEX; soil samples were additionally analyzed for gasoline range hydrocarbons and polycyclic aromatic hydrocarbons (PAHs). Figure 2, attached, shows the locations and results from the soil samples from November 2020 and January 2024.

Nature and extent of contamination.

Diesel is the primary contaminant, along with related chemicals including BTEX and PAHs. Affected media includes soil and shallow groundwater. Soil samples show that the low levels of diesel range hydrocarbons remain to 14 feet bgs in the vicinity of the UST basin but the contamination is limited to less than 10 feet bgs moving northwest away from the UST basin. The water table was observed at approximately 7 feet bgs in January 2024 and groundwater contamination was only observed at one boring at low levels to the northwest of the UST basin and due west of the dispensers.

4. RISK EVALUATION

Conceptual site model.

To evaluate human exposure to residual chemical contamination requires an assessment of the type and extent of that exposure. This is based on current and reasonably likely future site use. DEQ publishes risk-based concentrations (RBCs) for contaminants commonly encountered, for different types of exposure scenarios. These RBCs are conservative estimates of protective levels of contaminants in soil, groundwater and air. Table 1 shows potential exposure pathways and receptors for this site. Based on this, applicable RBCs are identified and used for risk screening.

CONCEPTUAL SITE MODEL TABLE

Table 1. Identification of applicable RBCs, based on pertinent pathways and receptors

	Pathway	Receptor			
			Is pathway complete?	Is RBC Exceeded?	Comments
Soil	Ingestion, Dermal Contact, and Inhalation	Residential and/or Urban Residential	No	N/A	Contamination not at surface.
		Occupational	No	N/A	Contamination not at surface.
		Construction Worker	Yes	Yes	TPH-D 12000mg/kg at UST basin wall on 11/23/20. RBC=4600 mg/kg.
		Excavation Worker	Yes	No	
	Volatilization to Outdoor Air	Residential and/or Urban residential	No	N/A	No residential use on site.
		Occupational	Yes	No	
	Leaching to Groundwater	Residential and/or Urban residential	No	N/A	No beneficial use of groundwater in the area of contamination
		Occupational	No	N/A	
Groundwater	Ingestion & Inhalation from Tap Water	Residential and/or Urban residential	No	N/A	No beneficial use of groundwater in the area of contamination
		Occupational	No	N/A	
	Vapor Intrusion into Buildings	Residential	No	N/A	
		Commercial	Yes	No	
	Groundwater in Excavation	Occupational	Yes	No	
Ecological		Terrestrial & Surface Water	No	N/A	Contamination not at surface and not expected to interact with surface water or aquatic sediments.

Contaminant concentrations.

Table 2. Highest Residual Concentrations of Contaminants of Interest

Contaminant of Interest	Date of Sampling	Sample Location	Maximum Observed Concentration	Comment
Soil				
Diesel	11/23/2020	UST West wall; 10ft bgs	12,000 mg/kg	Lowest applicable RBC = 4,600 mg/kg (Construction worker direct contact)
BTEX	1/4/2024	B1, west of dispensers; 7ft bgs	0.0377 mg/kg	Lowest applicable RBC = 50 mg/kg (Occupational volatilization to outdoor air)
PAHs	7/15/2019	Dispenser 6; 4.5ft bgs	0.37 mg/kg	Naphthalene Lowest applicable RBC = 83 mg/kg (Occupational volatilization to outdoor air)
Groundwater				
Diesel	1/4/2024	B1, west of dispensers	319 µg/L	Lowest applicable RBC = 1700 µg/L (Commercial vapor intrusion)
BTEX	1/4/2024	Multiple	ND ¹	

Notes:

¹ ND-Not detected.

Human health risk.

Diesel is a human health Contaminant of Potential Concern (COPC). The complete exposure pathway is for construction worker direct contact with soil. As shown in Table 2, diesel was detected in a soil sample from 10 feet bgs, at a concentration of 12,000 mg/kg with the applicable RBC of 4,600 mg/kg. The spatial extent of this concentration of diesel is very limited—all other samples from all three rounds of sampling from 2019 through 2024 did not observe diesel above the applicable RBC (4,600 mg/kg). Additionally, because of the depth of this sample (10 ft bgs) and the very limited spatial extent, the likelihood of prolonged exposures to construction or excavation workers should be very limited and should not result in unacceptable risk.

Ecological risk.

No ecological risks have been identified or are anticipated. The contamination is not at the surface and the site does not contain ecological habitat. And while dilute contamination in groundwater may migrate off-site, due to the distance to surface water, discharge to surface water or interaction with aquatic sediments is not anticipated.

5. RECOMMENDATION

Based on sample results for soil and groundwater, the low levels of contamination remaining in the vicinity of the UST releases should not result in unacceptable exposures to human health or the environment, and a No Further Action determination is recommended for the UST releases. The No Further Action determination should be recorded in DEQ's Your DEQ Online (YDO)

database (LUST No. 20-19-1049 and 20-20-0730). This recommendation is just for the UST releases discussed herein.

6. ADMINISTRATIVE RECORD

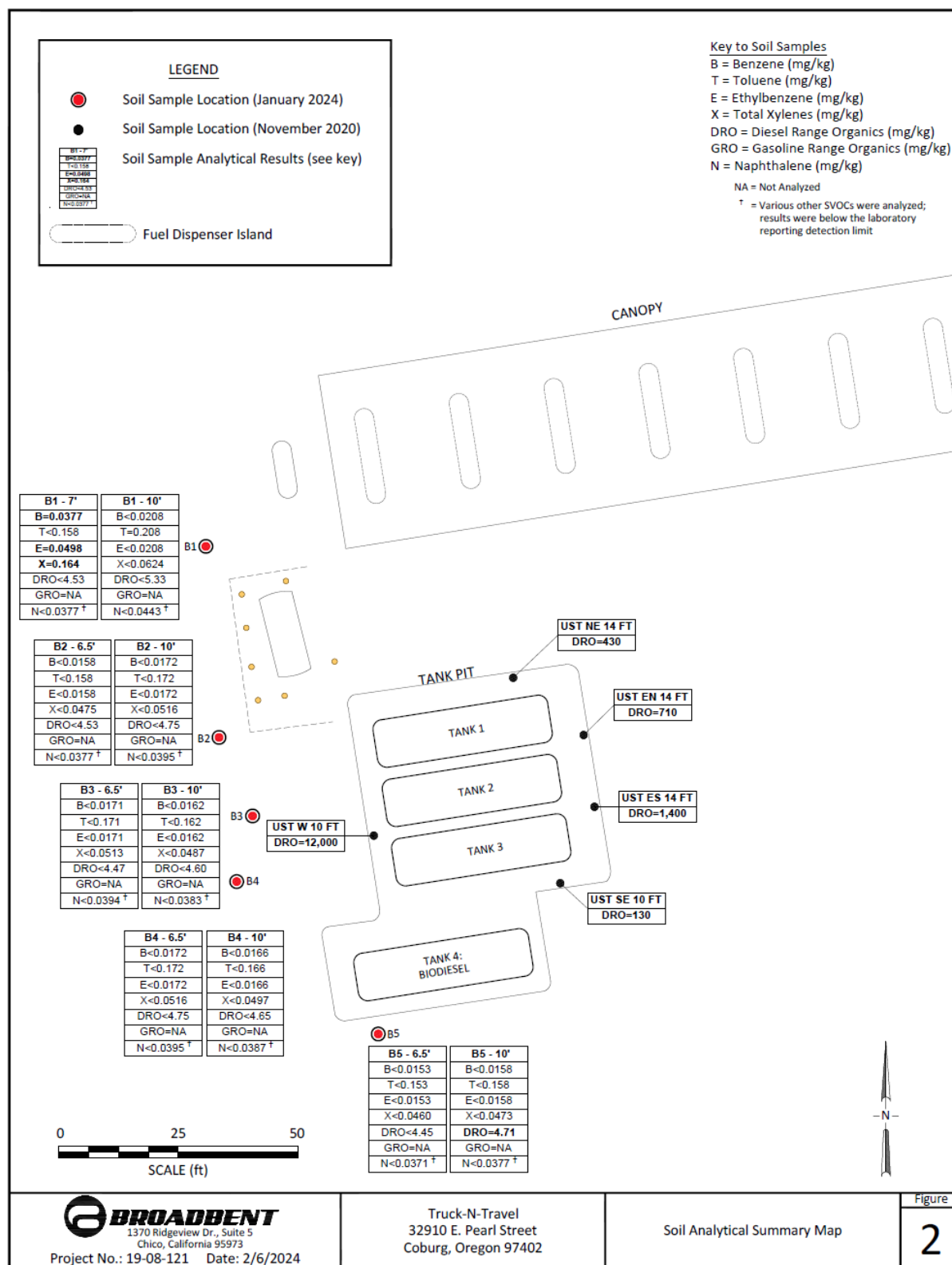
20220811_20-20-1049_Soil DelineationWorkPlan.pdf
20240209_20-20-1049_TruckNTravel - UST Soil & GW Delineation Report final.pdf
20191007_20-20-1048_20-19-0730_DispenserRemovalSamplingReport.pdf
20201118_20-20-1049-Truck N Travel III- OLPRR Screen and LIT.pdf

7. ATTACHMENTS

1. Vicinity map
2. Site map



Vicinity map



Site Map