

State of Oregon
Department of Environmental Quality

Memorandum

Date: August 19, 2024

To: FILE, LUST #15-22-0299

Through: Brad Shultz, Program Manager and Don Hanson, Lead Worker

From: Sarah Kingery, Project Manager
Western Region Cleanup Program

Subject: Tolleson LLC, LUST #15-22-0299; 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 Tolleson LLC, in Central Point, Oregon. As discussed in this report, contaminant concentrations in Soil 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: 21 S. Front St., Central Point, Jackson County Oregon.
- Latitude 42.3738 North, longitude -122.9175 West
- Tax lot 1400, Township 37 South, Range 2 West, Section 10

Site setting.

The site is 0.21-acre in size at the southeast corner of the intersection of S Front Street and E Pine Street. The site is within a commercial area of Central Point and zoned Employment Commercial. Commercial properties located on the other side of S Front and E Pine Streets are zoned Employment Commercial and Thoroughfare Commercial. The property located southeast of the site is occupied by a carwash. A sign shop is located on the property to the northeast.

Physical setting.

The site is flat and at an elevation of 1,275 feet above mean sea level. Soils encountered at the site consist of coarse sandy gravel to 12.5 feet below ground surface (bgs) and sandy clay from 12.5 feet to 14 feet bgs.

Groundwater was not encountered at the site during the underground storage tank (UST) decommissioning or exploratory borings. A survey of monitoring wells associated with leaking underground storage tank (LUST) projects in the vicinity of the site indicate that depth to groundwater in this part of Central Point is typically encountered at approximately 14 feet bgs.

Site history.

A Mobil Oil service station operated at the site from 1929 to 1973. A UST was discovered during a geophysical survey in 2021. The UST, thought to be a former waste oil UST, was decommissioned by removal in 2022. The building onsite is currently occupied by professional offices. Use is not expected to change. DEQ does not have additional information on other tanks at the site nor the decommissioning of the former service station.

2. BENEFICIAL LAND AND WATER USE DETERMINATIONS

Land use.

The site is within a commercial area of Central Point and zoned Employment Commercial (EC). Permitted uses in this zone include entertainment, professional offices, motel/hotel, and bed & breakfast. Multifamily dwelling (multiplex apartment and senior housing is also allowed but limited to above ground floor commercial only. Conditional uses include attached row houses, accessory units, hospital, public facilities, and religious assembly.

Groundwater use.

Groundwater was not encountered during site activities. Given that no groundwater was encountered, a groundwater beneficial use survey was not conducted. Shallow groundwater in this part of Central Point is typically encountered at 14 feet bgs. Drinking water is supplied by the City of Central Point to the site and adjacent properties

Surface water use.

There are no surface water features on or adjacent to the site. The nearest surface water is Griffin Creek located approximately ¼-mile south from the site. Stormwater on the southwest side of the site runs off to the street and is collected by storm drains at the intersection. There is a storm drain at the south end of the building that drains this portion of the site.

3. INVESTIGATION AND CLEANUP WORK

The area of concern at this site is the location of a former waste oil UST that was located on the south end of the building. The UST was discovered during a ground penetrating radar survey in February 2021. In April 2023 the 675-gallon UST was decommissioned by removal. Soil contamination was encountered directly beneath each end of the UST (7 feet 10 inches bgs). Analysis indicated the presence of heavy oil-range hydrocarbons. Soil samples were also tested for benzene, toluene, ethylbenzene, and total xylenes (BTEX), metals (by Toxicity Characteristic Leaching Procedure), polycyclic aromatic hydrocarbons (PAHs) and polychlorinated biphenyls (PCBs). None of these constituents were detected except for xylene.

Approximately 32 tons of soil was removed from the excavation and disposed of at Dry Creek Landfill. Following remedial soil excavation, six confirmation samples were obtained from the base of the excavation beneath the ends of the former UST and in the excavation sidewalls. Confirmation samples were analyzed for NWTPH-HCID. All confirmation soil samples were non-detect for gasoline, diesel, and heavy oil-range hydrocarbons. Groundwater was not encountered during site activities.

Nature and extent of contamination.

The contaminants of interest are gasoline and heavy oil-range hydrocarbons and xylenes. Based on the confirmation samples, remedial excavation activities removed impacted soil and there are no longer hydrocarbons present. Confirmation samples did not include analysis of BTEX to confirm that the xylene was also removed. However, concentrations of xylene detected in samples prior to excavation were below risk-based concentrations for all receptors.

4. RISK EVALUATION

Conceptual site model.

The original source of contamination was the waste oil UST which has been removed. A secondary source of contamination was contaminated soil which has been removed. Groundwater was not impacted.

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.

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	No	This is a commercial property, and use is not expected to change. Soil contamination is at a depth greater than 3 feet.
		Occupational	No	No	
		Construction Worker	Yes	No	
		Excavation Worker	Yes	No	
	Volatilization to Outdoor Air	Residential and/or Urban residential	No	No	Compounds in soil are not considered volatile.
		Occupational	No	No	
	Volatilization to Indoor Air	Residential	No	No	This is a commercial property and use is not expected to change.
		Commercial	Yes	No	

	Leaching to Groundwater	Residential and/or Urban residential	Yes	No	
		Occupational	Yes	No	
Groundwater	Ingestion & Inhalation from Tap Water	Residential and/or Urban residential	No	No	Note 1
		Occupational	No	No	Note 1
	Vapor Intrusion into Buildings	Residential	No	No	
		Commercial	Yes	No	
	Groundwater in Excavation	Occupational	No	No	
Ecological		Terrestrial & Surface Water	No	No	This is a paved commercial site with no ecological receptors.

Notes:

1. Groundwater is not used for drinking. This pathway is therefore not considered, in accordance with Section B.3.2.4 of DEQ's RBDM guidance. City water is provided. Local groundwater is not currently used for drinking water and is not likely to be used for this purpose in the future.

Contaminant concentrations.

Soil in the vicinity of the former waste oil UST was found to be contaminated with petroleum hydrocarbons. This contaminated soil, was detected directly beneath the UST at depths starting at 7 feet, 10 inches bgs. Analysis indicates petroleum hydrocarbons in the gasoline-range at a maximum of 56.8 mg/kg and in the residual or oil-range at a maximum of 4,800 mg/kg. PCBs and PAHs were not detected. Soil was analyzed by TCLP Metals. Only lead was detected at a concentration of 1.45 mg/l. The decommissioning report indicates that contaminated soil was removed to a final depth of 9 feet bgs. Confirmation samples were taken beneath the bottom of the excavation at depths slightly deeper than 10 feet. No petroleum hydrocarbons were detected in these confirmation samples.

Groundwater was not encountered during remediation and investigation activities at the site. Based on information submitted to DEQ, groundwater was not impacted.

Human health risk.

Soil contamination related to the waste oil UST has been removed. Groundwater was not impacted. There are, therefore, no unacceptable ecological risks identified for the site.

Ecological risk.

The site is a fully paved commercial site. There is no contamination remaining at the site. There are, therefore, no unacceptable ecological risks identified for the site.

5. RECOMMENDATION

Following removal of contamination and based on sample results for soil, acceptable risk levels are not exceeded, and a No Further Action determination is recommended for the waste oil UST release 15-22-0259, identified at this former service station site in 2022. The No Further Action determination should be recorded in DEQ's environmental data management system also known as Your DEQ Online (YDO) to reflect this decision.






6. ADMINISTRATIVE RECORD

2023-02-08_15-22-0299_DecomReport
2022-05-16_15-22-0299_20DayReportAndSampleReport
2023-07-11_15-22-0299_ClosureReport
2024-05-02_15-22-0299_Risk Based Closure Report

7. ATTACHMENTS

Property and Vicinity Map



-  = Property Boundary
- SB4  = Boring Location and Number
- MW-1  = Groundwater Monitoring Well Location and Number
-  = Groundwater Flow Direction
-  = Estimated Extent of Gasoline-Range Petroleum Hydrocarbons Above 100 ppb

