

FILE NAME: Flying J-Milwaukee #2 LOG NO. 03-93-0008

NWR'S NFA TRACKING CHECKLIST

ROUTE TO	ACTIVITY	RESPONSIBLE PERSON	DATE COMPLETED
	Sequent checked by project manager to make sure fees paid and tanks closed and that UST compliance issues have been resolved.	BNP	6/30/04
	OTIS updated with soil disposal, public notice, and other applicable information by project manager.	BNP	6/30/04
	Draft NFA prepared by Project Manager (PM) and submitted to NRS-4 Hydro or Manager for review	BNP	6/30/04
	Draft NFA approved by NRS-4 Hydro (or Manager, if necessary) and submitted for data entry	DDP w/noted additions + comment letters to ODOT/Ed's	8/9/04
	SEQUENT updated with final invoice request date and new green sheet information.		
	OPTIONAL STEP: Expedited payment request by responsible party (RP) is handled by =====>>		
	OPTIONAL STEP: Estimated Expedited Payment Amount given to RP by =====>>		
	To Administrative staff for cost recovery entries		
	Final invoice paid notice received from Business Office and PM informed by Manager		
	Final NFA drafted and signed by PM (and Manager, if necessary), and sent for data entry		
	SEQUENT updated with filed closed information.		
	Proofreading letter and file closure activities		
	Copies made and mailed		

NFA PROCESS COMPLETE

October 14, 2004

GURDEV SINGH SOHI
DELCO PETROLEUM COMPANY LLC
14 LONGLEAF DRIVE
HAMILTON SQUARE NJ 08690

Re: Flying J-Milwaukie # 2
DEQ File No. 03-93-0008
Facility No. 1747

Dear Mr. Sohi:

The Department of Environmental Quality (DEQ) has been overseeing the cleanup of petroleum contamination at the site of the Flying J- Milwaukie #2 located at 17837 SE McLoughlin Boulevard in Milwaukie, Oregon. Based on information contained in the file, the Department has determined the site appears to have been investigated and cleaned up to commercial standards in accordance with Oregon Administrative Rules (OAR) 340-122-205 through -360, and that no further action is required at this time.

This determination is a result of our evaluation and judgment based on the regulations and facts as we now understand them, including:

1. The site is an approximate 0.7-acre commercial property currently used a Jiffy Lube and retail petroleum fueling facility. Prior to ownership by Delco, the site was owned and occupied by Flying J, Inc. and the Milwaukie Fuel Stop. Ed's Muffler & Brakes borders the site along its northern perimeter and Buster's Restaurant is located to the south. Residential properties are located on an apparent basalt bench approximately 30 feet higher in elevation than the site. The land use at and adjacent to the site is commercial.
2. In April 1988, a historical release involving approximately 81 gallon surface spill was reported and subsequently cleaned up.
3. In January 1993, a release and soil impact from a petroleum product line was discovered during installation of a Stage II vapor recovery system. Subsequent investigations in May 1993 included five soil borings (boring B-1 through B-5). Free product was observed in borings B-1 and B-5.
4. In June 1993, an additional six borings were drilled and completed as groundwater monitoring wells MW-1 through MW-6. Groundwater was encountered at approximately seven feet below ground surface (bgs). A maximum benzene concentration of 23,000 ppm was observed in a soil sample collected from boring MW-2.

5. In July 1994, approximately one inch of free product was observed in monitoring well MW-3. Free product was removed on a weekly basis from July through October 1994, and on a bi-weekly basis from November 1994 through January 1995.
6. During November and December 1994, five 1,500 gallon motor oil USTs were decommissioned by removal. Soil cleanup activities were not completed.
7. In January 1995, monitoring wells MW-7 through MW-9 were installed. During ground water sampling, free product was observed in MW-7 and was removed. Free product was not reported in any monitoring wells after September 1995. In 1966, onsite monitoring wells MW-10, MW-12, and MW-13 were installed. Also an off-site down-gradient well MW-11 was installed to the north of the Jiffy Lube facility and west of Ed' Muffler & Brakes.
8. In October 1999, four steel underground storage tanks (USTs), one 8,000 gallon diesel and three 12,000 gallon gasoline, were decommissioned by removal. Approximately 5,000 tons of petroleum-impacted soil were excavated and transported to TPS Technologies in Portland. An estimated 200,000 gallons of groundwater that accumulated in the excavation and was stored in onsite holding tanks was aerated and discharged into an onsite storm drain under a National pollutant Discharge Elimination System permit. The former UST cavity was extended east, southeast and west based on soil sample analytical results. At the western extent of the excavation, an unreported accumulation of building materials, auto parts and trash was uncovered, apparently dating from the early 1960s when a prior station had been demolished. Approximately 230 tons of soil and 10 truck tires were transported offsite for disposal.
9. In 2001, Wohlers Environmental Services calculated an estimated volume of an irregular shaped gasoline-impacted and benzene-impacted soil pocket left-in-place west, north and east of the former diesel and gasoline USTs extending southeast beneath the former dispense islands associated with historical petroleum releases at the facility. The pocket is predominantly between 10.5 feet and 15 feet bgs. The total estimated volume of the gasoline-impacted pocket is approximately 550 cubic yards. The total estimated volume of the remaining benzene-impacted soil is approximately 360 cubic yards. Benzene concentration in remaining soil ranged from 1.46 to 1.78 ppm along the northern excavation walls, and 2.35 ppm to 9.94 ppm along the southern excavation sidewalls. None of these soil samples containing benzene at concentrations above the current risk-based concentration (RBC) for vapor intrusion into buildings for occupational human receptors was located within 10 lateral feet of a current commercial building. A steel sheet pile retaining wall was installed approximately 52 inches from the southern edge of the adjacent Ed's Muffler and Brakes building to prevent erosion. The retaining wall was installed in 1999 to an approximate depth of 30 feet bgs.

Gurdev Singh Sohi
June 30, 2004
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cc: Christopher C. Wohlers
Wohlers Environmental Services, Inc.
7440 SW Hunziker St., Suite C
Tigard, OR 97223

Gurdev Singh Sohi

June 30, 2004

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- Modify per PN*
10. In November 1999, onsite monitoring wells MW-14 and MW-15 were installed. In late 1999 and early 2000, four new USTs and associated systems were installed on the northern-central portion of the site. Quarterly groundwater monitoring was conducted during the years 2000 to 2001.
 11. In February 2004, further site investigation was conducted that included completion of four drivepoint borings DP-1 through DP-4 to a depth of 10 feet bgs at and adjacent to the site north, west and east of the adjoining Ed's Muffler & Brakes Building. Only diesel constituents as oil were detected at a concentration of 1,150 ppm in a groundwater sample collected from boring DP-1. Follow up polynuclear aromatic hydrocarbons (PAHs) analysis indicated relatively low concentrations of six PAH constituents.
 12. Review of community and domestic potable water well log files maintained by OWRD indicated that only one domestic potable water well is located within 0.25 mile of the site. This well has a casing depth of approximately 60 feet, is located approximately 0.2 mile southwest of the site and is separated from the site by a low ridge. Potable water for the site and nearby properties is supplied by the City of Milwaukie Oak Lodge Water District.
 13. A risk assessment was conducted and a Conceptual Site Model was developed for the site. Investigations and analytical results indicated that soil and groundwater concentrations of petroleum hydrocarbons whole products and individual constituents were below risk-based standards for occupational ingestion, dermal contact and inhalation, volatilization to outdoor and indoor air, and construction and excavation worker exposure pathways.

Conduct after cleanup

This DEQ determination will not apply if new or undisclosed facts show the cleanup does not comply with referenced rules. This determination also does not apply to any conditions at the site other than the release of the petroleum product specifically addressed in the May 2, 2001 WGR site assessment report.

Please note that pursuant to OAR 340-122-360 (2), you must retain a copy of your report until ten (10) years after the first transfer of the property.

Your efforts to comply with the regulations to ensure that your property has been adequately cleaned up have been appreciated. If you have any questions, please feel free to contact me at (503) 229-5858.

Sincerely,

Bijan N. Pour
UST Cleanup and Compliance Section
NWR Tanks Program

LEGEND

- = Boring location
- ⊕ = Groundwater monitoring well location
- ⊙ = Abandoned groundwater monitoring well location
- ▤ = Catch basin
- ⊗ = Sewer manhole
- UST = Underground Storage Tank
- (92.70') = Groundwater elevation
- TPH-Dx = Total Petroleum Hydrocarbon-Diesel extended
- Gx = Gasoline extended
- D = Diesel
- O = Oil
- PAHs = Polynuclear Aromatic Hydrocarbons
- RBDM = Risk-Based Decision Making
- VOCs = Volatile Organic Compounds
- B = Benzene
- T = Toluene
- E = Ethylbenzene
- X = Xylenes
- Acy = Acenaphthylene
- F = Fluorene
- Fl = Fluoranthene
- Ph = Phenanthrene
- Py = Pyrene
- Chy = Chrysene
- IPB = IsoPropylBenzene
- NPB = n-PropylBenzene
- MTBE = Methyl Tertiary Butyl Ether
- 1,2,4-TMB = 1,2,4-TriMethylBenzene
- 1,3,5-TMB = 1,3,5-TriMethylBenzene
- ND = Not Detected
- mg/l = milligrams per liter or parts per million (ppm)
- All Results in micrograms per liter (ug/l) or parts per billion (ppb) unless otherwise stated.

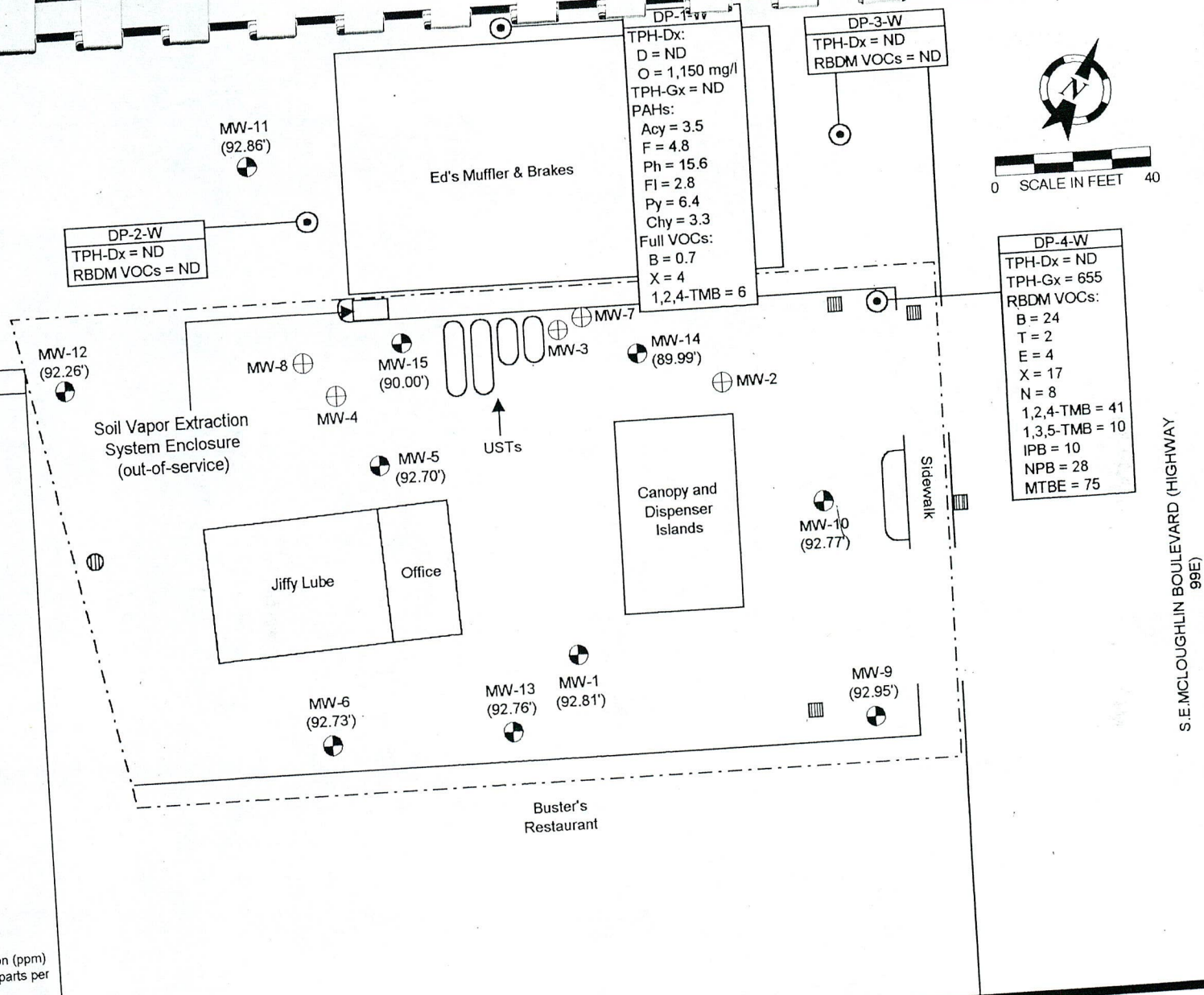


FIGURE 3

GROUNDWATER SAMPLE LOCATION & ANALYTICAL RESULTS MAP

DELCO PETROLEUM RETAIL FUELING FACILITY
 17869 S.E. MCLOUGHLIN BOULEVARD
 MILWAUKIE, OREGON

PROJECT NO.: 04-0003
 DATE: 03/24/04
 SCALE: 1" = 40'
 FILE: GWResults
 DRAWN BY: KB

