Oregon
Tina Kotek, Governor

Department of Environmental Quality
Northwest Region
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5696

October 23, 2024

via *Electronic Delivery (email)*

HITT Contracting
Attn: Greg Medlin
2900 Fairview Park Drive
Falls Church, VA 22942

RE: No Further Action Determination
4951 NE Huffman Street, Hillsboro, Oregon
ECSI# 6548

Dear Greg Medlin:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information for the Huffman Street Property (the Site), including the closure report entitled *Report of Diesel Spill Cleanup and Assessment* dated May 9, 2023, which was submitted to DEQ by Anderson Geological. The Huffman Street Property address is 4951 Northeast Huffman Street in Hillsboro, Oregon, Tax Lot 1N2210003100.

DEQ has determined that remedial action to address environmental contamination at Huffman Street property 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:

- The 90.4-acre property was developed for agricultural use since at least 1952 until 2020. The property is currently zoned by the City of Hillsboro as Industrial Sanctuary (I-S) and is developed with several industrial buildings that are occupied by QTS Data Center. The Site is expected to remain as industrial or commercial use in the future.
- On March 20, 2023, diesel-contaminated soil was discovered near the southeast corner of Building HIL2-DC-2 of the QTS Data Center. The source of the release was determined to be an overfill of an electrical generator on March 19, 2023. The generator was used during the construction process and has since been removed from the Site. The volume of the spill was not determined.
- The fuel preferentially migrated through the structural sandy gravel fill that was used in the area during the construction of the concrete footings for Building HIL2-DC-2. A total of 332.2 tons of contaminated soil was excavated and disposed of at the Hillsboro Landfill. The excavation extended east of the footing and to approximately 9 feet below ground surface (bgs). Impacted soil from beneath and to the west of the footing could not be excavated due to concerns about the structural integrity of the building if soil was removed from beneath it.
- Nine soil samples were collected from the bottom of the excavation and analyzed for total petroleum hydrocarbons as diesel (TPH-d) and total petroleum hydrocarbons as heavy oil (TPH-o). Three of the samples (SW1-9.0, WSW-9.0, and NW-9.0) contained TPH-d concentrations that ranged between 1,340 milligrams per kilogram (mg/kg) to 4,560 mg/kg. TPH-d and TPH-o were not detected in the other samples.

- On April 3, 2023, a shallow trench was excavated along the building footing and water with a red oily film (dyed red for off-road diesel) seeped into the trench from the gravel beneath the footing. Approximately 700 gallons of water was vacuumed from the trench until the water no longer displayed the red film; however, a clear, oily film was still observed on the water that accumulated in the trench. A water sample was collected (Foot-W-4/3) and it contained a TPH-d concentration of 16,600 micrograms per liter (µg/l). An additional pothole was excavated approximately two feet east of the trench along the building footing. The groundwater that entered the pothole did not appear to be impacted by red-dyed diesel, indicating that the diesel-impacted structural fill is limited in extent.
- Soil and groundwater samples were collected from five borings (B-1 through B-5) that were advanced to the north, east, and south/southwest of the spill area to delineate the contamination. The area directly west of the spill area was not accessible due to the location of the building. TPH-d and TPH-o were not detected in any of the soil or groundwater samples from the borings except boring B-1. TPH-d was detected in soil collected from 8 feet bgs in boring B-1 at a concentration of 534 mg/kg and in the groundwater collected from boring B-1 at a concentration of 10,800 µg/l.
- Residual soil contamination was left in place along the eastern and southern exterior walls of Building HIL2-DC-2. The soil contamination is at a depth of approximately 8 feet bgs, which is a greater depth than what occupational workers are reasonably likely to encounter (i.e., 3 feet bgs) but may be encountered by construction or excavation workers. All detected concentrations in the soil were less than the applicable risk-based screening concentrations for occupational land use, construction worker, or excavation worker scenarios.
- Residual groundwater contamination remains in the shallow groundwater near the southeastern corner of Building HIL2-DC-2 (approximately 5 to 10 feet bgs). Productive groundwater aquifers within deeper sand and gravel layers within the basin fill deposits have been reported in driller's logs from local properties at depths of approximately 100-300 feet bgs.
- A query of the Oregon Water Resources Department Well Report database identified fifty domestic wells, nine irrigation wells, and two industrial wells within a quarter mile radius of the property, including one domestic water well on the QTS Data Center property. The well was reportedly installed in 1974 and was completed to a depth of 93 feet bgs; however, no existing water wells were observed on the QTS property during development, and it is assumed that the well was previously abandoned. Additionally, according to the City of Hillsboro's In-Town Service Area map, properties within 1,200 feet of the spill area are provided drinking water by the City of Hillsboro Water Department. Based on the limited extent of the residual contamination, the identified wells are unlikely to be impacted.
- Vapor intrusion risks into the building are not expected because the spill area is capped with an eight-inch concrete floor slab and a 15-mil vapor barrier was installed beneath the building's floor slab. Additionally, the building has roof-top heating, ventilation, and air conditioning units that distribute fresh air through ductwork into the building.
- Most of the property is paved and unlikely to support ecological receptors. The nearest surface water body is Waible Creek, which crosses the north portion of the property and is located approximately 1,000 feet north of the spill area. Based on the depth and limited extent of the residual contamination, ecological receptors are unlikely to be impacted.

Based on the available information, soil and groundwater conditions at the Huffman Street property are currently protective of public health and the environment in accordance with Oregon environmental cleanup law, Oregon Revised Statutes (ORS) 465.200 et seq. 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 Your DEQ Online database to reflect this decision.

This letter only applies to the 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.

A copy of the Anderson Geological closure report supporting this No Further Action decision can be viewed here. 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 Rebecca Digiustino at (503) 926-2257 or via email at rebecca.digiustino@deq.oregon.gov.

Sincerely,

Kevin Parrett, Manager
Northwest Region Cleanup Section

Attachments: Site Location Map
Sample Location Plan

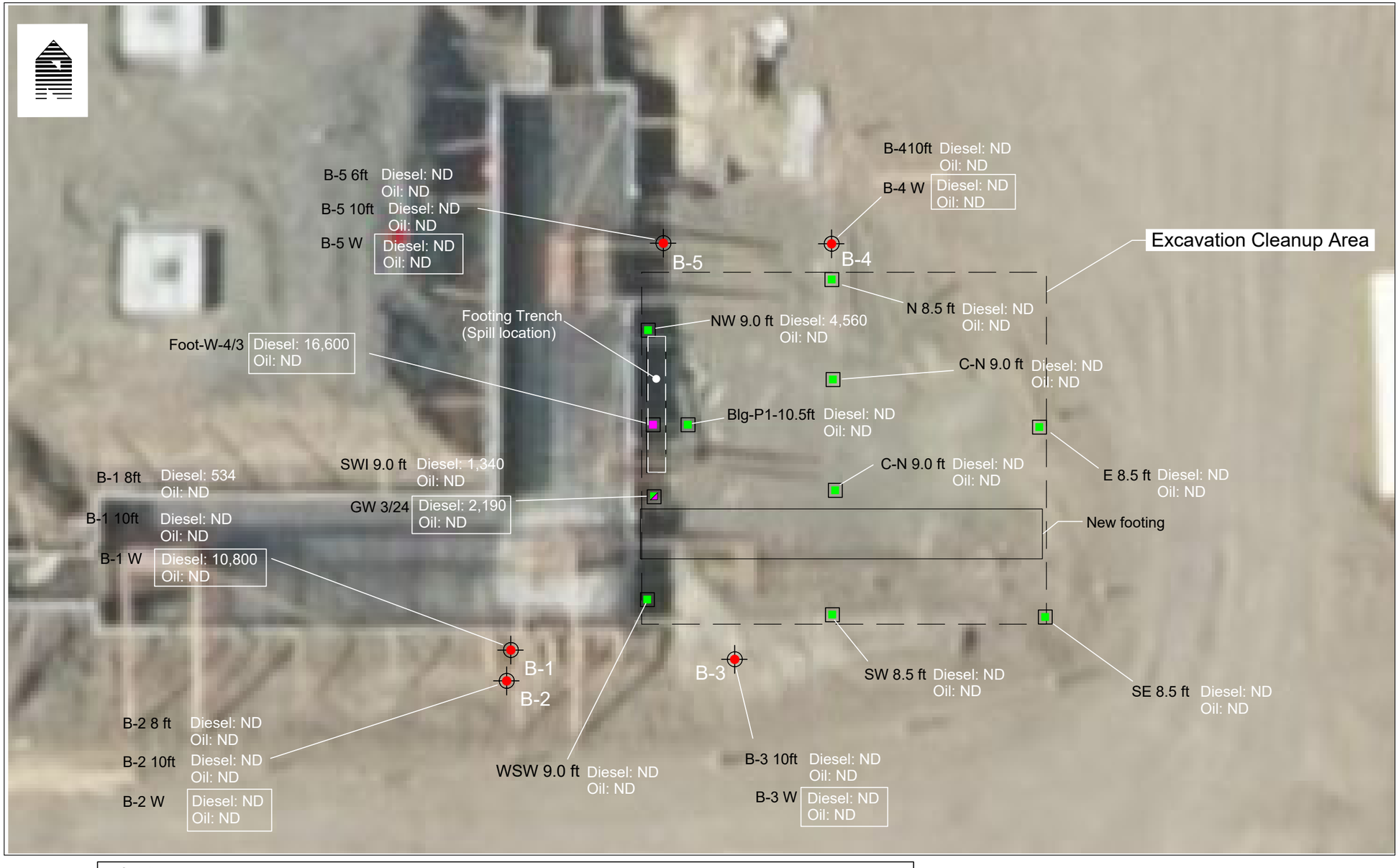
cc: Rebecca Digiustino, DEQ
Jeff Schatz, DEQ
ECSI File #6548

ANDERSON GEOLOGICAL

SITE LOCATION MAP

QTS Data Center - Building 1
Hillsboro, Oregon

SIZE		PROJECT NO. 1819.00	REV
A			
		May 2023	FIGURE 1



LEGEND

- Push-probe boring (current investigation)
- Soil grab sample
- Groundwater grab sample

Sample results are for soil, and are expressed in milligrams per kilogram.

Sample results in white text boxes are for groundwater, and are expressed in micrograms per liter.

Soil depths indicated in the excavation area are refereced to the original ground surface, which is approximately 8.5 feet above the finished excavated surface.

Scale: 1" = 10'

0 5 10 15 20

ANDERSON GEOLOGICAL

SAMPLE LOCATION PLAN

QTS Facility
4951 NE Huffman Street, Hillsboro, Oregon

SIZE A | PROJECT NO. 1819.00 | REV

May 2023 | FIGURE 2