



# Oregon

Tina Kotek, Governor

Department of Environmental Quality  
Northwest Region  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232  
(503) 229-5696  
FAX (503) 229-6124  
TTY 711

March 3, 2025

Ed Stafford  
The Bulk Plant LLC  
PO Box 1021  
Molalla, Oregon 97038

RE: No Further Action Determination  
for Molalla Pacific Pride, Molalla, Oregon  
LUST #03-22-0098

Dear Ed Stafford:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information for the Molalla Pacific Pride site, including the closure report entitled *Risk-Based Assessment Report* dated April 11, 2023, which was submitted to DEQ by HydroCon, LLC (HydroCon) on your behalf. The Molalla Pacific Pride site address is 627 West Main Street in Molalla, Clackamas County, Oregon, Tax Lot 52E08A08400

DEQ has determined that remedial action to address environmental contamination at Molalla Pacific Pride site 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 site is developed with a two-story commercial building, a warehouse, and a cardlock fueling facility. The cardlock fueling facility is managed by Pacific Pride and the commercial building and warehouse are occupied by an animal feed store. The site is currently zoned for light industrial land use and is reasonably likely to continue use as a commercial or industrial land use in the future.
- Prior to 1994, the facility contained an underground storage tank (UST) system that consisted of one diesel UST and one gasoline UST and was decommissioned in 1994. The current UST system was installed in 1994 and consists of three gasoline USTs and two diesel USTs.
- During the decommissioning of the first UST system, diesel contamination was discovered under a fuel dispenser and the site as assigned leaking underground storage tank (LUST) number 03-94-0087. After a remedial soil excavation, the LUST file was closed in 2000.
- An aboveground storage tank (AST) area was also previously located in the northeast corner of the property and an associated loading rack was located in the center of the Site. The loading rack and ASTs were decommissioned and removed from the property in the early 2000s.
- In September and October 2021, six soil borings (GP-1 through GP-6) were advanced at the site near the current cardlock UST system, the former UST basin, and the former loading rack locations. Groundwater samples were collected from GP-1 and GP-2 at depths of approximately 20 feet below ground surface (bgs) and 24 feet bgs. Boring GP-6 met refusal at 18 feet bgs and no soil or groundwater samples were reportedly collected.

- On June 11, 2024, soil and groundwater samples were collected from four borings (ACC-1 through ACC-4) advanced at the property. Temporary groundwater monitoring wells were installed in each well and groundwater was encountered at approximately 19 to 24 feet bgs.
- The site and surrounding properties, except for the northwest adjacent property, are zoned for commercial use and, therefore, the residential pathway is incomplete for the site. However, a residence is located on the northwest adjacent property; therefore, boring ACC-4 was advanced on-site, approximately 133 feet southeast of the residence, to screen for potential vapor intrusion risks to the residence.
- Gasoline range petroleum hydrocarbons (GRPH), ethylbenzene, and/or naphthalene were detected at a concentration greater than the leaching to groundwater risk-based concentration (RBC) for residential and occupational pathways in soil samples collected from GP-1, ACC-2, and ACC-4. Diesel range petroleum hydrocarbons (DRPH) were detected at a concentration greater than the soil ingestion, dermal contact, and inhalation RBC for construction worker pathway, in soil collected from GP-1 at approximately 7.5 feet bgs and ACC-2 at 7.5 feet bgs. Borings GP-1 and ACC-2 were advanced in the former UST basin.
- Concentrations of naphthalene, total lead, GRPH and/or DRPH exceeded the ingestion and inhalation from tap water RBCs for the residential and/or occupational pathways in groundwater samples collected during both investigations; however, the property and surrounding areas are supplied drinking water by the municipal water system and the nearest domestic well was identified approximately 825 feet east (upgradient) of the site. Once connected to the municipal water supply, domestic wells (if present) can only be used for non-beneficial purposes (e.g., irrigation). Shallow groundwater beneath the site has no current or likely future beneficial use as a drinking water source and the elevated concentrations are unlikely to impact human health.
- The concentration of GRPH in soil from ACC-4 was slightly greater than the vapor intrusion into buildings RBC for the residential pathway; however, no other analyte exceeded their respective vapor intrusion into buildings RBC for the residential pathway. Additionally, there were no exceedances of the vapor intrusion into buildings RBC for the residential pathway in groundwater from ACC-4 and no exceedances of the vapor intrusion into buildings RBC for the occupational pathway in soil or groundwater, as applicable, from GP-1 through GP-5 and ACC-1 through ACC-4. Based on the detected concentrations in soil and groundwater, the limited area of elevated concentrations, and the distance to the respective buildings, the contamination does not pose unacceptable risks under residential or occupational exposure scenarios, as appropriate for each property use.
- The site is entirely paved and devoid of habitat. Freshwater forested and shrub wetlands are located approximately 0.2 miles northeast of the site and Bear Creek is located approximately 0.5 miles to the southwest of the site. No ecological or human health risks were identified because all residual contaminated soil is paved, and the extent of groundwater contamination is limited.
- Although future development is not anticipated at this time, any potentially future redevelopment in this area that may include an excavation of greater than 5 feet bgs near the former loading rack should be managed through implementation of DEQ-approved contaminated media management plan (CMMP). The CMMP should establish procedures for evacuation, characterization, and management of soil exhibiting characteristics of impact by petroleum hydrocarbons

Based on the available information, soil and groundwater conditions at the Molalla Pacific Pride site are currently protective of public health and the environment in accordance with Oregon environmental cleanup law, Oregon Administrative Rules 340-122-0205 through 340-122-0360. 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 has updated the LUST database to reflect this decision.

This letter only applies to the release(s) 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 HydroCon, LLC closure report supporting this No Further Action decision can be viewed at [https://ormswd2.synergydcs.com/HPRMWebDrawer/Record?q=webdrawercode%3A%22\\*089\\*%22+And+recAnyWord%3A%22LUST03-22-0098%22&sortBy=](https://ormswd2.synergydcs.com/HPRMWebDrawer/Record?q=webdrawercode%3A%22*089*%22+And+recAnyWord%3A%22LUST03-22-0098%22&sortBy=). 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](mailto:rebecca.digiustino@deq.oregon.gov).

Sincerely,

*Peter F Donahower*

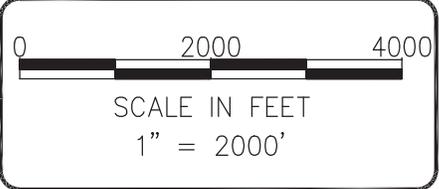
Peter Donahower  
Northwest Region Petroleum Cleanup Section

Attachment(s): Site Location Map  
Site Features  
Boring Locations

cc: Jeff K. Schatz, DEQ  
LUST #03-22-0098 File



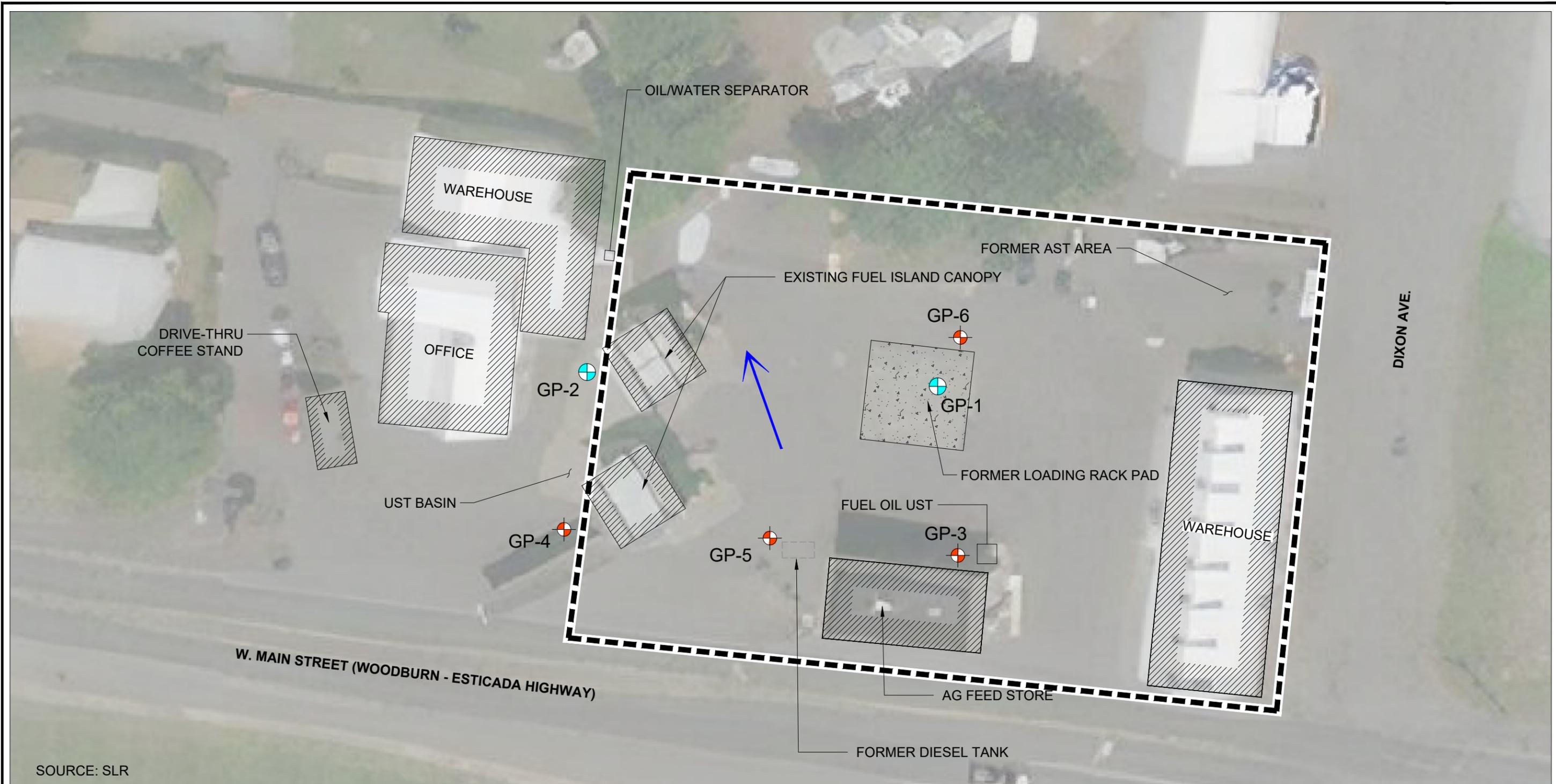
**NOTE(S):**  
 USGS, MOLALLA QUADRANGLE,  
 OREGON - CLACKAMAS COUNTY  
 7.5 MINUTE SERIES (TOPOGRAPHIC)



3925 NE 72nd Ave, Suite 103, Vancouver, Washington 98660  
 Phone 360.703.6079 Fax 360.703.6086

DATE: 4-2-2023  
 DWN: LC  
 CHK: CD  
 APPROVED: CD  
 PRJ. MGR: CS  
 PROJECT NO:  
 10027-001.00

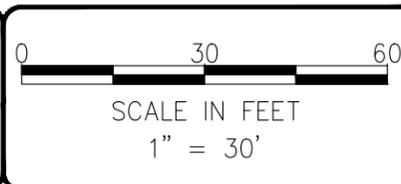
FIGURE 1  
 SITE LOCATION MAP  
 MOLALLA RISK-BASED ASSESSMENT  
 RE/MAX HOMESOURCE  
 627 W. MAIN STREET  
 MOLALLA, OREGON



SOURCE: SLR

**Legend**

- Subject Site Property Boundary (Approximate)
- ▨ Building/Canopy
- ◉ Former Soil Boring Location and Designation
- ◉ Former Soil Boring and Temporary Well Location
- ← Groundwater Flow Direction



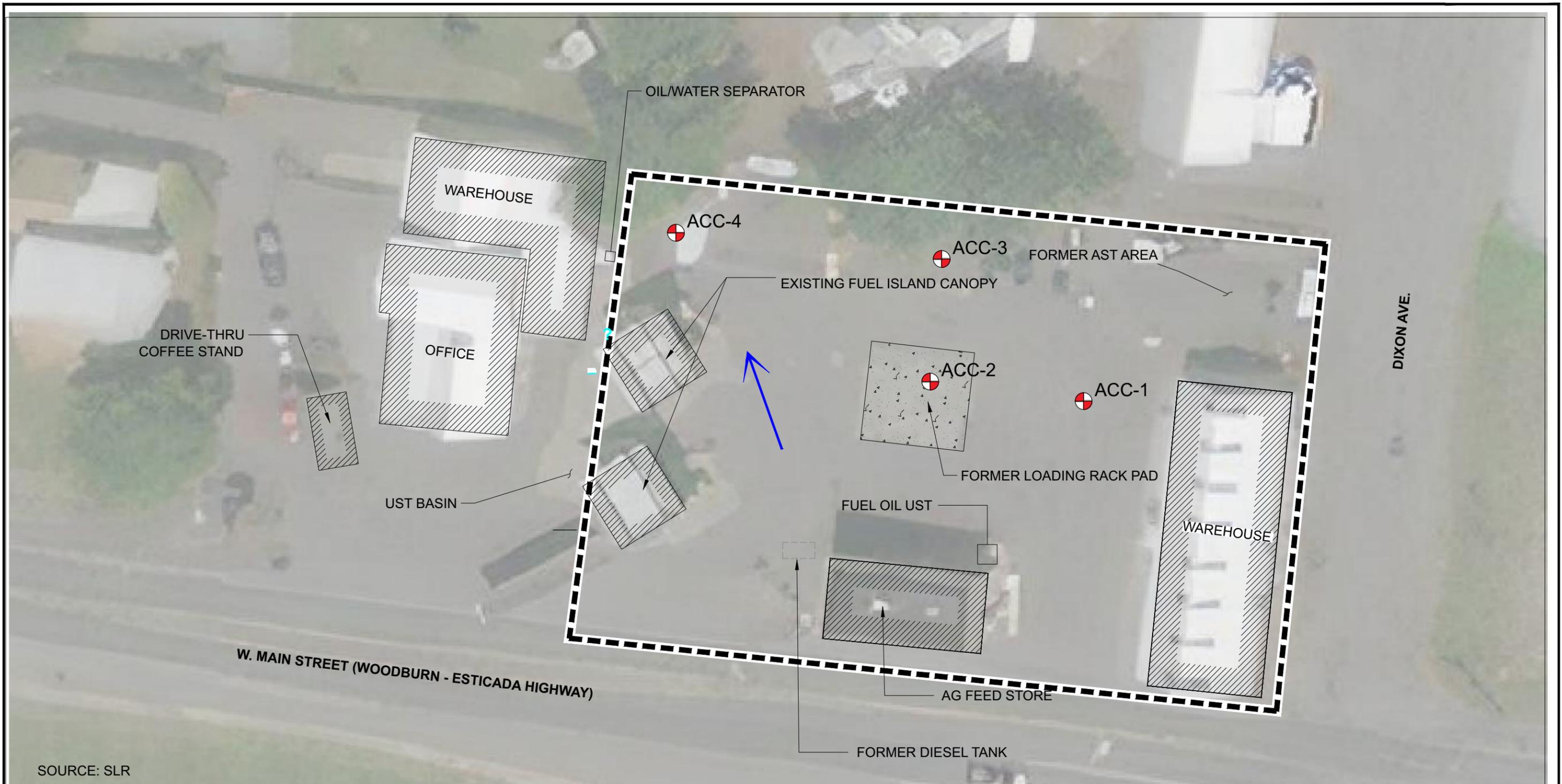
3925 NE 72nd Ave, Suite 103, Vancouver, Washington 98660  
 Phone 360.703.6079 Fax 360.703.6086

DATE: 1-30-2025  
 DWN: LC  
 CHK: CD  
 APPROVED: CD  
 PRJ. MGR: CD  
 PROJECT NO:  
 10027-001.00

FIGURE 2  
 SITE FEATURES  
 MOLALLA SUBSURFACE INVESTIGATION REPORT  
 RE/MAX HOMESOURCE  
 627 W. MAIN STREET  
 MOLALLA, OREGON

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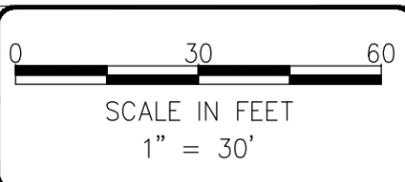
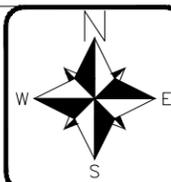
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SOURCE: SLR

**Legend**

-  Subject Site Property Boundary (Approximate)
-  Building/Canopy
- 
-  Soil Boring Location and Designation
-  Inferred Groundwater Flow Direction




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**FIGURE 3**  
BORING LOCATIONS  
MOLALLA RISK-BASED ASSESSMENT  
RE/MAX HOMESOURCE  
627 W. MAIN STREET  
MOLALLA, OREGON

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