

LONG Rachel * DEQ

From: CLAUSSEN Jennifer * DEQ
Sent: Wednesday, October 18, 2023 11:09 AM
To: Josh Owen
Cc: Jon White; Marty Burck; SCHERZINGER Bruce * DEQ; LUST Info * DEQ; WILSON Steve V * ODF; TEGEN Trent * ODF; PFAU Joseph J * ODF
Subject: RE: LUST #22-90-4171 - ODF-Lyons: Work Plan

Thank you for submitting your proposed work plan for DEQ comment. Although we have not yet received an agreement to pay for DEQ oversight from Department of Forestry, this plan was reviewed. Time spent reviewing this proposed plan and response will be billed to the site's Responsible Party, the Department of Forestry.

This site will need to be evaluated for a risk-based closure. The workplan submitted overall looks good. Typically we ask to see soil borings from all sides and bottom of tanks and around fuel dispenser(s). Because samples are being collected after the tank pit has been filled, at a minimum we would like to see 5 borings; one from all sides of tank pit and one from the bottom of the pit center. Ensure the samples are taken within two feet below the former excavation. Soil borings should be extended to the soil-water interface, field screened; additionally sampling any obviously contaminated areas. Soil and groundwater samples should be analyzed for Diesel, gasoline, and related RBDM constituents. If there are any drinking water wells on-site or on nearby neighboring properties, they should be sampled as well, per your beneficial groundwater use survey. Notification should be sent to DEQ when this work will be performed.

Sincerely,

Jennifer Claussen, Duty Officer
DEQ-Environmental Cleanup Program
4026 Fairview Industrial Dr. SE
Salem, OR 97302
Cell: 503-545-9219
Fax: 503-378-4196
Pronouns: she/her/hers [Why share pronouns?](#)

From: Josh Owen <jowen@msbaenvironmental.com>
Sent: Thursday, October 5, 2023 11:38 AM
To: CLAUSSEN Jennifer * DEQ <Jennifer.CLAUSSEN@deq.oregon.gov>
Cc: Jon White <jwhite@msbaenvironmental.com>; Marty Burck <mburck@msbaenvironmental.com>
Subject: RE: LUST #22-90-4171 - ODF-Lyons: Work Plan

Good Morning, Jennifer,

MSBA has prepared the following work plan to perform a subsurface investigation related to the reported release of petroleum hydrocarbons (PHCs) from an underground storage tank system at the Oregon Department of Forestry (ODF) property in Lyons (LUST # 22-90-4171). As previously discussed, a DEQ project manager has not been assigned to this site, therefore, we are requesting your feedback regarding the proposed scope of work. The objective of this work is to characterize the soil and groundwater to establish compliance and obtain regulatory site closure.

MSBA reviewed the available site documents and determined the following data gaps will need to be addressed to achieve site closure:

1. It appears that confirmation soil samples were not collected from the excavation cleanup area to confirm that PHCs had been successfully removed.
2. It appears a groundwater sample was not collected from the monitoring well within the cleanup area due to the top of the well being damaged, buried, or otherwise obstructed.

To address these data gaps, MSBA proposes the following:

1. **Ground Penetrating Radar (GPR) Survey:** MSBA will perform a GPR survey in an attempt to locate the former tank cavity/excavation area and monitoring well location.
2. **Soil Boring Investigation:** MSBA will advance three soil borings at/near the former tank cavity/excavation area and collect soil samples necessary to determine whether PHCs were removed during the excavation cleanup. The proposed boring locations are illustrated on the attached Figure. Boring B1 will be advanced to groundwater, assuming it is present at 25 feet or less. Soil samples will be collected at the apparent bottom of the former excavation cleanup area and the groundwater interface (assuming groundwater is encountered). If the former monitoring well cannot be located or the condition is not acceptable for sampling, a temporary well will be installed within the boring B1 and groundwater will be sampled. If soil at the groundwater interface and groundwater do not appear to be impacted at boring B1 based on field screening, borings B2 and B3 will be advanced to shallower depths consistent with the apparent bottom of the former excavation cleanup area. Soil samples will be collected to confirm that the former excavation cleanup successfully removed soil containing PHCs and will act as confirmation sidewall samples. If soil at the groundwater interface and/or groundwater at boring B1 does appear to be impacted, borings B2 and B3 may be advanced to greater depths for the collection of groundwater samples and the locations may be adjusted.
3. **Analytical Strategy:** MSBA will submit a minimum of three soil samples and one groundwater sample for laboratory analysis of PHCs using methods NWTPH-Gx and NWTPH-Dx. Groundwater interface samples and/or the sample(s) with the highest concentrations and a minimum of one groundwater sample will be analyzed for additional constituents of interest as warranted based on the diesel, oil, and gasoline results.
4. **Site Closure:** If PHCs are not present or the detected concentrations are below the most stringent RBCs, MSBA will request regulatory site closure. If PHCs are present and the regulatory extent is adequately defined, MSBA will prepare a conceptual site model (CSM) evaluation including an underground utility survey, beneficial water use survey, surface water assessment, and land use evaluation to assess the potential exposure pathways. Provided the site data and CSM results are favorable, a risk-based closure report summarizing the site assessment activities, CSM results, and risk evaluation will be prepared and submitted to DEQ for review and comment. If the regulatory extent is not adequately defined by the proposed boring locations, additional characterization may be necessary.

We would like to complete this work as soon as possible and we appreciate you providing your assistance to expedite the process. Please contact me if you have any questions regarding the site and/or proposed work.

Thanks,
Josh Owen
Project Manager



Phone: 855 387 4422
JOwen@MSBAenvironmental.com

From: CLAUSSEN Jennifer * DEQ <Jennifer.CLAUSSEN@deq.oregon.gov>
Sent: Friday, September 22, 2023 12:45 PM
To: Jon White <jwhite@msbaenvironmental.com>
Subject: RE: LUST #22-90-4171 - PM Assignment Request

Good afternoon, Jon!

I have included a copy of my last correspondence with ODF regarding this site. They continue to contest cost recovery agreement requirements to have a Project Manager assigned to their site. We are required to recover our costs associated with reviewing a site for closure, so I'm not sure how to proceed.

Do you have a site plan you need reviewed? I am able to provide some technical assistance for sites without being an assigned Project Manager.

Who is your current contact with ODF? Is it still Joe? I can check in with my Program Manager and see if they can have a discussion with your ODF contact on how to proceed with this site and the cost recovery portion so we can move forward with getting a Project Manager assigned.

Jennifer Claussen
DEQ-Environmental Cleanup Program
4026 Fairview Industrial Dr. SE
Salem, OR 97302
Cell: 503-545-9219
Fax: 503-378-4196
Pronouns: she/her/hers [Why share pronouns?](#)

From: Jon White <jwhite@msbaenvironmental.com>
Sent: Friday, September 22, 2023 12:04 PM
To: ISMERIO Dawn * DEQ <Dawn.ISMERIO@deq.oregon.gov>
Cc: CLAUSSEN Jennifer * DEQ <Jennifer.CLAUSSEN@deq.oregon.gov>
Subject: LUST #22-90-4171 - PM Assignment Request
Importance: High

Some people who received this message don't often get email from jwhite@msbaenvironmental.com. [Learn why this is important](#)

Dawn,

MSBA is preparing to complete site assessment activities for closure at the ODF property located at 22965 North Fork Road SE in Lyons, OR (LUST #22-90-4171). We are reaching out again in hopes that a project manager can be assigned as possible and provide feedback prior to completing the work. Please let me know if there is anything, we can do to expedite this process. You may already have a cost agreement on file for this site, however I cannot confirm this. Please contact me if you have any questions.

Sincerely,

Jon White

Project Manager

