



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

March 16, 2022

Anton Lutfi
OR 1647 LLC
2368 Maritime Dr.
Elk Grove, CA 95758

RE: No Further Action Determination
for OR 1647 LLC in Beaverton
LUST #34-21-0084

Dear Mr. Lutfi:

The Oregon Department of Environmental Quality (DEQ) has completed a review of available file information for the OR 1647 LLC site, including a *Risk-Based Corrective Action Determination* submitted to DEQ by Point Source Solutions on November 19, 2021 on your behalf. The site address is 2820 SW Cedar Hills Boulevard, Tax Lot 1S109AD 2800.

DEQ has determined that remedial action to address environmental contamination at the OR 1647 LLC 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 located on the northeast corner of the intersection of SW Cedar Hills Boulevard and SW Gem Lane in Beaverton.
- Weber's Shell Service Station was constructed on the site in about 1964 and operated until about 1970. The site was undeveloped rural land prior to 1964.
- The service station was torn down and replaced by a restaurant in 1972. Tenants have included Herfy's Restaurant (1972 to the early 1980s), Arctic Circle (early 1980s to the late 1990s), and Arby's (late 1990s to the present).
- A geophysical survey in December 2020 identified a potential backfilled underground storage tank (UST) pit off the south side of the restaurant.
- Sampling in December 2020 identified gasoline, diesel, and heavy oils in a soil sample to the east of the backfill. Virtually no volatile organic compounds (VOCs) were detected in either the contaminated soil sample or in a sub-slab vapor sample from beneath the restaurant.
- Additional samples were collected in September and November 2021 to determine the nature and extent of the contamination. Up to 2,920 parts per million (ppm) gasoline, 615 ppm diesel, and 1,540 ppm heavy oils were detected in the soil.
- Concentrations of carcinogenic polycyclic aromatic hydrocarbons (cPAHs) in the soil were less than 0.1 ppm (adjusted to the toxicity of benzo[a]pyrene). Concentrations of metals were consistent with naturally-occurring background concentrations.

- Groundwater was encountered about 12 feet below ground surface. Six groundwater samples were collected. No petroleum products (gasoline, diesel, heavy oils) were detected in the groundwater.
- Point Source estimates that less than 350 cubic yards of petroleum-contaminated soils (PCS) are present at the site. The PCS is limited to the southeast quarter of the site.
- The site is zoned Community Service (CS) by the City of Beaverton, and is part of an auto-oriented commercial strip along Cedar Hills Boulevard, with the Cedar Hills Crossing shopping center to the west and Walker Center strip mall to the east.
- No urban residential development is currently present along Cedar Hills Boulevard in the site vicinity, and future urban residential use in the commercial strip is not anticipated.
- Residual contaminant concentrations at the site are below DEQ's risk-based concentrations (RBCs) for all applicable occupational and construction worker exposure pathways.
- The nearest significant ecological habitats are two parks, approximately 1,000 feet north-northeast and 1,000 feet west-southwest of the site. As contamination at the site is confined to subsurface soils, no complete ecological exposure pathways are present.

Based on the available information, soil and groundwater conditions at the OR 1647 LLC site are currently protective of public health and the environment in accordance with 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 will update the Leaking Underground Storage Tank (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 Point Source Solutions report supporting this No Further Action decision can viewed on [DEQ's LUST database](#). DEQ recommends keeping a copy of all of the documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Kevin Dana at 503-229-5369, or via email at kevin.dana@deq.oregon.gov.

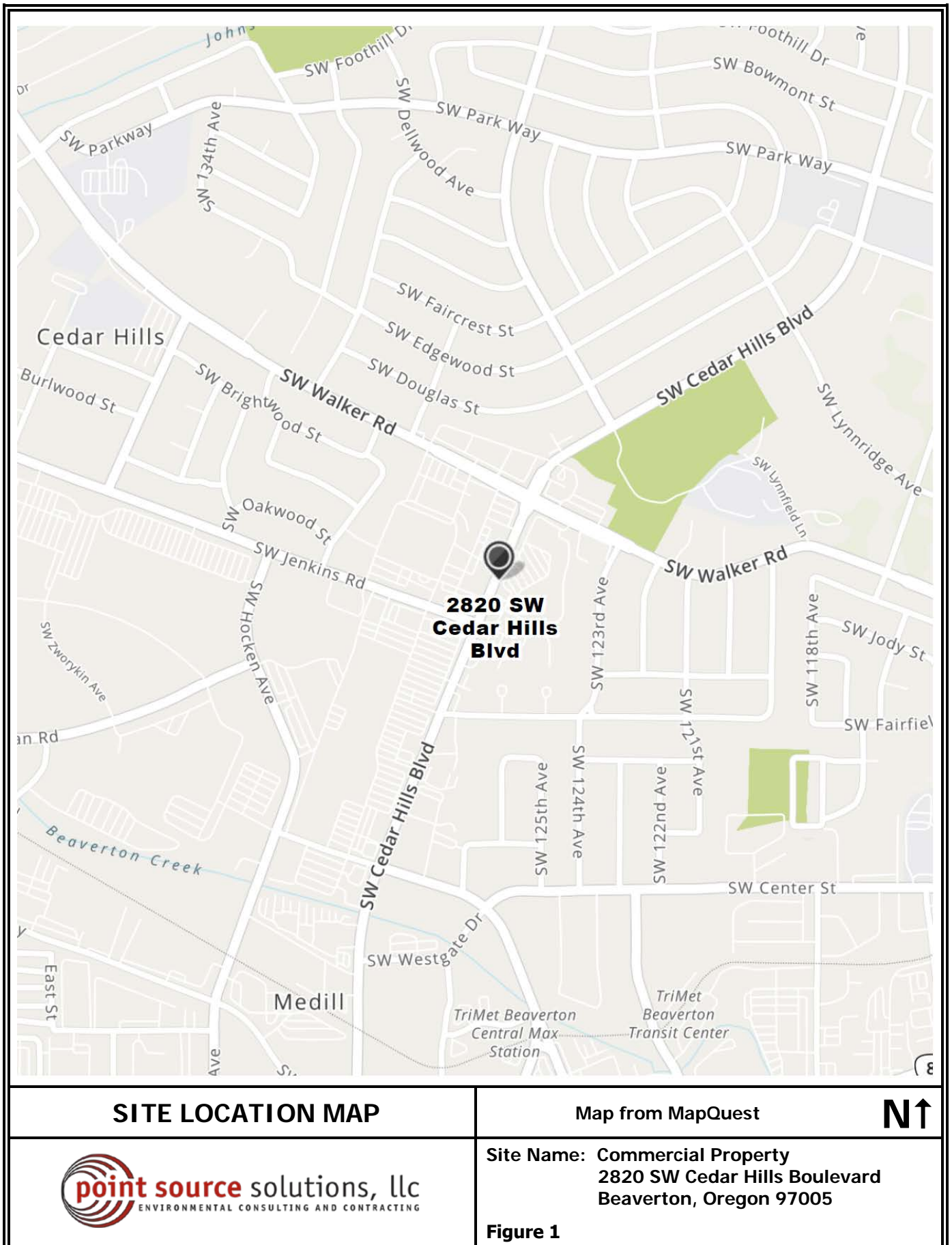
Sincerely,



Kevin Parrett, Manager
Northwest Region Cleanup Section

Attachments: Site Maps & Table

cc: Gil Cobb, Point Source Solutions
LUST #34-21-0084 File





SITE PLAN

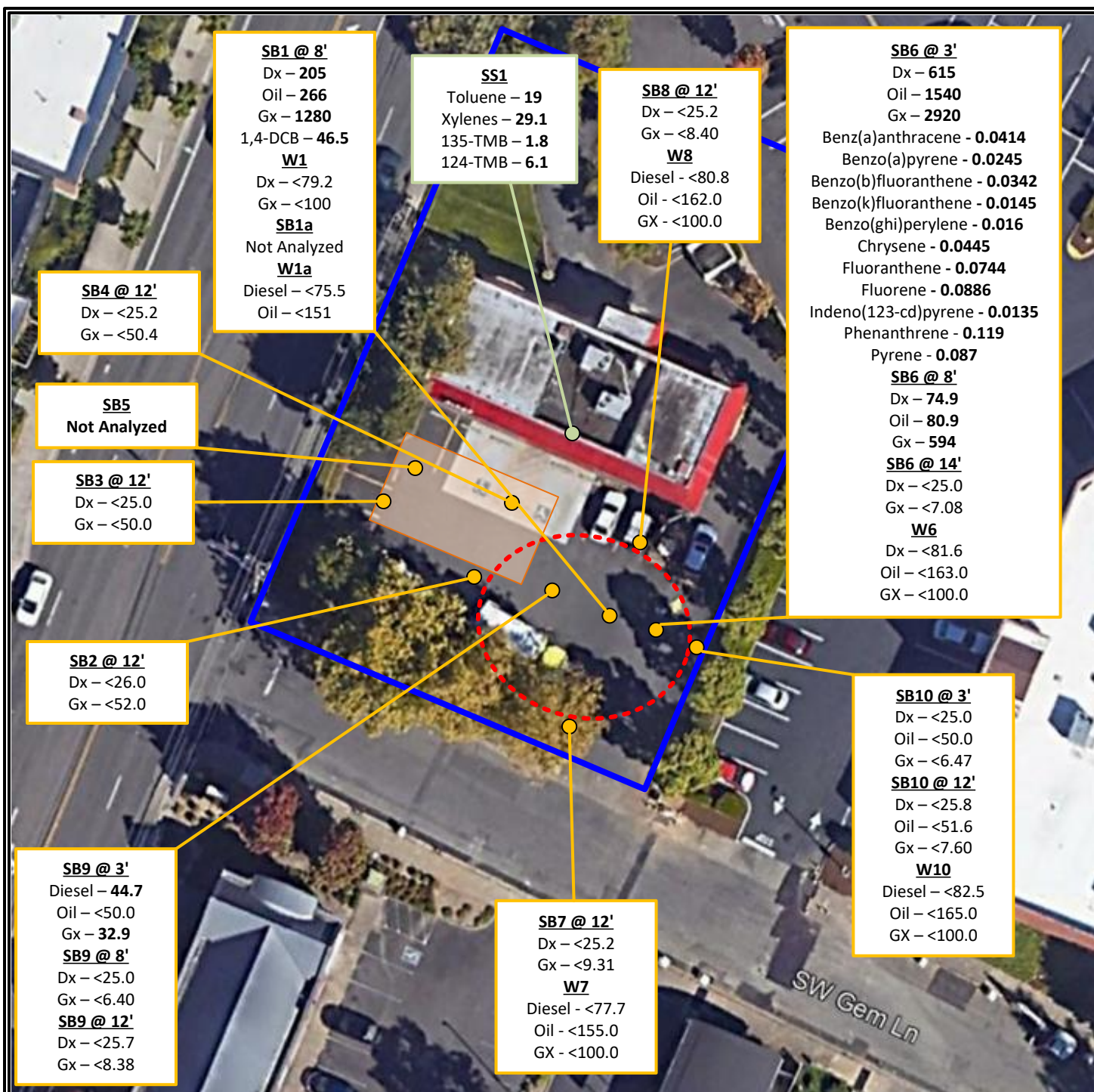
From Google Earth 2020

N↑



Site Name: Commercial Property
2820 SW Cedar Hills Blvd
Beaverton, Oregon 97005

Figure 2



SAMPLE LOCATION DIAGRAM

Aerial Imagery from
Google Earth (2020)

N↑

Notes:

- Vapor results in ug/m³
- Soil results in mg/kg
- Groundwater results in ug/L
- ND = None Detected

● Soil/Water Sample Location

● Subslab Vapor Sample Location

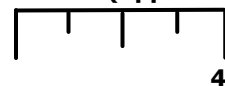


Property Boundary



Geophysical Anomaly
(Disturbed Soil)

Scale in Feet (Approximate)



45



Site Name: Commercial Property
2820 SW Cedar Hills Blvd
Beaverton, Oregon 97005

Figure 3

Table 1

Calculation of Benzo[a]pyrene TEQ from cPAH Concentrations in Soil Samples

OR 1647 LLC

Location ID:		Boring SB6 (3 ft bgs)	
cPAH Analyte	TEF	Sample Concentration (mg/kg)	BaP TEQ (mg/kg)
Benz[a]anthracene	0.1	0.0414	0.00414
Benzo[a]pyrene	1	0.0245	0.0245
Benzo[b]fluoranthene	0.1	0.0342	0.00342
Benzo[k]fluoranthene	0.01	0.0145	0.000145
Chrysene	0.001	0.0445	0.0000445
Dibenz[a,h]anthracene	1	0	0
Indeno[1,2,3-cd]pyrene	0.1	0.0135	0.00135
Benzo[a]pyrene TEQ			0.03

Compare to RBC

Notes:

TEF = toxic equivalency factor (relative to benzo[a]pyrene)

TEQ = toxic equivalency (relative to benzo[a]pyrene)

BaP = benzo[a]pyrene