

RESPONSE TO PUBLIC COMMENTS ON PROPOSED CONSENT JUDGEMENT WITH HOLINGSWORTH AND VOSE FOR EVANITE

This documents DEQ's response to public comments received on the proposed consent judgment with Hollingsworth & Vose Fiber Company (H&V) to implement remedial actions for solvent contamination in soil and groundwater at the former Evanite Fiber Corporation site in Corvallis, ECSI #0040. The site is located at 1115 SE Crystal Lake Drive in Corvallis. A public notice announcing a 30-day comment period running from March 1 through March 31, 2025, on the proposed consent judgment was posted in Secretary of States Bulletin on March 1, 2025, and the Corvallis Gazette Times and the Albany Democratic Herald on March 6, 2025. The notice was also posted on DEQ's public website and mailed to the City of Eugene, Benton County and nearby property owners and interested parties.

The notice was also posted on DEQ's website and provided to subscribers on DEQ's Environmental Cleanup Program Daily Bulletin subscription list.

Comments on the proposed consent judgment were received by e-mail and voice mail. Each comment is provided below followed by DEQ's response.

1. E-mail Comment March 3, 2025

I am a resident who received a notice regarding the facility across the street from me. I wanted to suggest a stipulation that will certainly generate some peace of mind for my neighbors and myself. This is a residential neighborhood adjacent to a large park which has children, sports enthusiasts including but not limited to baseball, soccer, boating. We are a community that has college students, working adults and retirees. It's a community that collectively has a few needs that are essential. One need that is common amongst all of us is that we need sleep. The factory across the street doesn't seem to recognize that it's the neighbor in the community that causes sleepless nights for the rest of us 24/7. Whether it's loud rock crushing at 3 in the morning or workers exiting the facility with no mufflers in unison at midnight... or the constant hum that drowns out the Serenity of the river and other nature sounds. This is a residential community, and we need peace. We need rest. This factory should have operating hours that reflect the needs of our community. It should be quiet at night and shouldn't be a disturbance on weekends. Therefore, I propose operating hours reflective to standard business hours from 8 am to 5 pm Monday through Friday. If they want to exist in our community, they need to uphold operating hours that the rest of us can exist in harmony. These operating hours would save the company money and keep our neighborhood at peace. It may even taper off some of the adverse harm caused by the contaminated ground water. Please consider this enforcement,

DEQ Response: Thanks for your interest in our public notice. I'm sorry to hear about the noise problem in your community from the facility and the disruption this is causing. DEQ does not

have a noise program or the authority to investigate complaints related to noise, but we do have noise rules that local governments may utilize. You can find these rules at this website: <https://www.oregon.gov/deq/Residential/Pages/noise.aspx>.

I checked their website and found that the City of Corvallis does have a noise ordinance, and they are probably the best local entity to help you with the noise problem coming from the Hollingsworth and Vose facility. Here is a link to the City's website for reporting problems online: <https://www.corvallisoregon.gov/community/page/report-problem-online>.

I will also forward your e-mail to the City's development department, so they are aware of the issue.

If you have any questions, comments or concerns related to the proposed consent judgment public notice and the cleanup of the former Evanite Fiber facility solvent release, please let me know and I can help you with those.

2. E-Mail Comment March 4, 2025

I am writing about Hollingsworth and Vose. I looked over the documents and it seems none are current. Most are information and data from about 5-6 years ago. I recommend getting current readings. Also, I feel it is time to slowly close down this company which is still spewing CO into the atmosphere surrounded on three sides by a neighborhood. There is no doubt they need to continue with their cleanup efforts until all the readings are clean and up to standard for no less than 10 years.

DEQ Response: Thank you for pointing out the lack of more recent information. I looked at the files and realized a few recent documents were missing and I have uploaded these to the database. They include the 2020 Annual Performance Monitoring Report, a data package with monitoring data from 2021 to 2023 and a Remedial Design/Remedial Action Workplan. You can now view these on our website. H&V's consultant monitors the groundwater on a quarterly to semi-annual basis and reviews the performance of the remedial action on a bi-monthly basis. DEQ gets bi-monthly performance reports regularly during the year and then more comprehensive annual reports at the beginning of the following year. We will be getting an annual report 2024 at the end of this month. If it comes sooner, I will upload to the website. In general, the data is showing the current system is effective in containing and helping to reduce the contamination in soil vapors and groundwater.

I'm sorry I can't help you with the ongoing operations of H&V, but you might try calling the City of Corvallis to discuss it with them, as they are responsible for local zoning, planning and development. If you have concerns about emissions from H&V's operations or would like to know more about their emissions, I can put you in contact with our air quality program. Just e-mail me back that you'd like a contact, and I can find the best one for you.

Thank you and I hope my response is helpful.

Follow-up Comment: *I am in favor of continued efforts for clean up, as I said in the last email.*

I would like to speak with someone regarding air quality and would appreciate you connecting me with someone. Last I heard H and V was still operating without a permit for CO they are emitting into the neighborhood. Is that still the case?

DEQ Response: For questions about air quality-air emissions from the plant, you can contact the DEQ staff who work on the air quality permits for H&V. They are:

Alex Haulman
Alex.haulman@deq.oregon.gov
971-678-0471

Mike Eisele
Michael.eisele@deq.oregon.gov
503-575-0477

Follow-up Response DEQ Air Quality (Mike Eisele): *Alex H&V's permit writer is out today, but I am happy to answer your questions if you want to give me a call. Also here is a link to H&V's air quality permit, emissions inventory, and annual reports*
<https://deqonline.deq.state.or.us/aq/aqpermitonline/SearchResult.asp?sourcenumber=&sourcename=hollingsworth&streetaddress=&city=&zip=&county=°region=&permitnumber=&permitttype=&documenttype=&yearissued=¤tdocumentsonly=1>. Looks like Nancy just sent you this link too.

I was also provided these webpages from our air quality program staff that you can look at for information on the air quality and air quality permits for H&V:

1. *H&V CAO page:* <https://www.oregon.gov/deq/aq/cao/wr/Pages/Hollingsworth-and-Vose.aspx>, which includes all the info about the CAO process to date.
2. <https://deqonline.deq.state.or.us/aq/aqpermitonline/SearchResult.asp?sourcenumber=&sourcename=hollingsworth&streetaddress=&city=&zip=&county=°region=&permitnumber=&permitttype=&documenttype=&yearissued=¤tdocumentsonly=1> from here you can view the annual reports, emissions inventory, and AQ permit.

H&V was issued an air quality permit in 2022 that limits the amount of carbon monoxide (CO) they can emit. Before DEQ set the new higher CO limit we checked to make sure H&V would not cause an exceedance of the national ambient air quality standard. We found that if H&V was to emit at the highest level the permit allows them to emit at the highest concentration near H&V's facility would be about 5 times below this standard.

3. E-Mail Comment March 4, 2025

I'm reaching out about this public notice: <https://www.oregon.gov/deq/get-involved/documents/033125evanite.pdf>. It's hard to tell what the notice is inviting comments on. It repeatedly references a consent judgment; I looked through the files online and the closest thing I found is this (<https://ormswd2.synergycds.com/HPRMWebDrawer/Record/6878175>) but it's unsigned, undated, and doesn't include a case number, so it seems like it may be a draft. If you could steer me in the right direction on what is exactly being presented for comments, I'd

greatly appreciate it.

DEQ Response: Thank you for your interest in the Evanite cleanup. Sorry if the notice was confusing. You were looking at the correct document. It is a draft of the consent judgment for public comments. Once the public comment period is over and comments are addressed, the draft will be signed, dated, given a case number and finalized for entry into the court. One of the most important parts of the document is the statement of work in Exhibit B – Remedial Design/Remedial action. It explains what the next steps are for cleanup work at the site. If you would like, I can go over the document with you by phone or a team's call.

Note that DEQ is required by law to do a 30-day public notice and comment for any proposed Consent Judgment or cleanup

Follow-up Comment: *Thanks for the clarifications! I trust DEQ on the clean-up and won't provide any comments. But I do have a couple of questions that I think can be answered by email. First, the notice mentions a "deed restriction on future property use." Maybe I missed it, but I didn't see this discussed in the draft consent judgment. Can you provide more information on what that restriction entails? Also, what extent of the property will it apply to? The entire H&V facility spans about 40 acres -- will the restriction affect the entire site, or a portion of it?*

My other question is more general to the plume. Someone told me that H&V will pay for irrigation well testing for properties near the site. Do you know whether that is true -- and if so, how would we look into it? We live at 1360 SE Crystal Lake Dr and to my knowledge our well has never been tested. From the graphics I've seen we appear to be just outside the area of concern, but it would still be good to know for sure that our well water is safe.

DEQ Response: Hope you had a nice weekend. I attached the deed restriction (Easement and Equitable Servitudes) you are asking about below. The only tax lots with land use restrictions are 1000 and 1100. This is the area where the release occurred and contaminated soil is capped with asphalt. See page 3, Section 3.3 of the attached easement.

3.3. **Land Use Restrictions.** Residential use of any type is restricted on the two lots within the cap engineering control (i.e., Lots 12502CA01000, 12502CA01100).

Regarding the irrigation well, I checked with the Evanite/H&V consultant (PNG Environmental) and found that your well was sampled frequently between 1986 and 2000 and had little to no detections of the contaminants (tetrachloroethylene and trichloroethylene) resulting from Evanite. In general, since current and historical information indicates that your well isn't affected by the contamination from Evanite, additional sampling of your well is no longer necessary and is not something DEQ would require. However, I'd be happy to give you the contact information for the consultant, so you can reach out to them directly. Please let me know if you'd like that information. Below is a specific response from PNG. Attachments are provided in Exhibit A.

E-mail from Brad Berggren on March 17, 2025 – Evanite/H&V Environmental Consultant.

As a follow up to our conversation, I've attached to this email background documents with information pertinent to the irrigation well located at 1360 Crystal Lake Drive. Below are descriptions of pertinent information provided in those background documents (each letter below

corresponds to an attached file name).

a. Well at 1360 Crystal Lake Dr sampled frequently from 1986 to 2000 as part of pre-remedial and post-remedial sampling to delineate the nature and extent of contamination and document effectiveness of the remedial actions. TCE was predominately non-detect with a few low-level detections. Most recent sampling in March and September 2000 were non-detect for TCE. This data was most recently included in the 2009 Annual Report.

b. Pre-remedial groundwater conditions (pre-1991) show Well 1360 as TCE<1 ug/L. The 2007-2008 groundwater conditions show TCE<1 ug/L along Vera Ave (between Evanite and the 1360 Well). Groundwater does not flow from Evanite toward Well 1360.

c. TCE in groundwater at Vera Ave wells IMW-21 and IMW-22 has been <1 ug/L since 2009, and predominately non-detect since 2012. These wells are still monitored annually.

d. ROD-era 2014 groundwater conditions show TCE<1 ug/L along Vera Ave and Well 1360 outside of the defined Neighborhood Area. Neighborhood Area boundary established based on previous 20 plus years of characterization of the Evanite plume and hydrogeologic flow conditions (e.g., Well 1360 is upgradient of the Evanite groundwater plume)

e. Current 2024 groundwater conditions show TCE non-detect along Vera Ave. Groundwater pumping has continued since 1991 providing plume containment and directing flow inward toward the source zone at Evanite. Groundwater does not flow from Evanite toward Well 1360.

f. An area of TCE contaminated groundwater has been identified by DEQ upgradient of the Evanite Groundwater Plume (Mayberry Groundwater Plume). Map of the Mayberry Groundwater Plume (ECSI #3769) shows Well 1360 within the boundary of this groundwater plume (Preliminary Assessment Report, Weston 2004). The Mayberry Groundwater Plume is upgradient of the Evanite Plume and also has low levels of TCE (<7 ug/L).

g. DEQ Staff Memorandum (Oct 22, 2018) recommends NFA, has additional maps of the Mayberry Groundwater Plume. Section 3 (Page 4 of 8) of the report states that after 2001 sampling of wells in the Mayberry Plume Area, DEQ determined there was a TCE source upgradient of Evanite.

h. Mayberry Groundwater Plume NFA issued Dec 18, 2018

4. E-Mail Comment March 27, 2025

I fully support any all cleanup by Hollingworth & Vose at their site. I live right next door on Crystal Lake Dr and am very concerned about contamination in the soil and groundwater. I would like the strictest requirements for this site in perpetuity, we have to protect the people, river and wildlife in this area. Please continue to monitor H&V and make sure they are doing what is required to keep us all safe.

DEQ Response: Thank you for your interest and support of the cleanup. I understand your concern especially living so close to the facility. Please be assured that DEQ will continue to oversee H&V through the cleanup process. The cleanup activities by H&V so far have helped to reduce the contamination and contain it on the site, so that it does not affect the neighborhood or the river directly. The next steps should really help to reduce the contamination even further. Please call or e-mail me if you have any other questions or concerns.

5. E-Mail March 31, 2025

As a neighbor to the Hollingsworth Vose/Evanite property, I want to see the cleanup of the TCE spill move ahead. The spill and subsequent cleanup began years ago and, after being a neighbor to the property for 17 years, I'm hopeful this will move ahead. It has gone on too long. I'm in favor of the proposed consent judgement.

DEQ Response: Thank you for your interest and support of the cleanup. I understand how you feel the cleanup has been going on a long time especially with living near the facility for over 17 years. But be assured that the cleanup activities completed so far at the facility have helped to reduce the contamination and contain it on the site, so that it does not affect the neighborhood or the river directly. The next steps outlined in the consent judgment will help to reduce the contamination even further.

6. Phone Calls Received During Public Comment

- Voice mail from interested resident was received on March 4, 2025. DEQ returned the call and left a voice mail with phone number to call back. Caller never called back
- Voice mail left by Planning Manager - City of Corvallis regarding what tax lots in the easement and equitable servitudes had land use restrictions. DEQ returned call on March 3, 2025, and left a return message describing the tax lots in which the restrictions applied and a return phone number. Caller did not call back.
- Voice mail received from interested party on March 6, 2025. DEQ returned the call on March 7, 2025, and left a voice mail with contact information. Caller did not call back.

EXHIBIT A

Table 3
Groundwater Analytical Results - VOCs
 Evanite Fiber Corporation
 Corvallis, Oregon

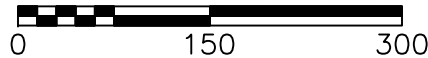
Well	Date	Trichloroethene	Tetrachloroethene	Cis-1,2-dichloroethene	Trans-1,2-dichloroethene	Vinyl chloride	1,1-Dichloroethene	1,1-Dichloroethane
MW1360Cr	06/12/1986	1.0 U	-	-	-	-	-	-
MW1360Cr	06/19/1986	1.0 U	-	-	-	-	-	-
MW1360Cr	06/27/1986	1.0 U	-	-	-	-	-	-
MW1360Cr	07/07/1986	1.0 U	-	-	-	-	-	-
MW1360Cr	07/28/1986	1.0 U	-	-	-	-	-	-
MW1360Cr	07/30/1986	1.0 U	-	-	-	-	-	-
MW1360Cr	10/13/1986	1.0 U	-	-	-	-	-	-
MW1360Cr	11/14/1986	1.0 U	-	-	-	-	-	-
MW1360Cr	12/18/1986	1.0 U	-	-	-	-	-	-
MW1360Cr	02/26/1987	5.0 U	-	-	-	-	-	-
MW1360Cr	06/30/1987	1.0 U	-	-	-	-	-	-
MW1360Cr	09/01/1987	1.0 U	-	-	-	-	-	-
MW1360Cr	06/01/1989	1.0 U	-	-	-	-	-	-
MW1360Cr	12/01/1989	1.0 U	-	-	-	-	-	-
MW1360Cr	03/01/1990	1.0 U	-	-	-	-	-	-
MW1360Cr	06/01/1990	1.0 U	-	-	-	-	-	-
MW1360Cr	09/01/1990	1.0 U	-	-	-	-	-	-
MW1360Cr	12/01/1990	1.0 U	-	-	-	-	-	-
MW1360Cr	03/01/1991	1.0 U	-	-	-	-	-	-
MW1360Cr	03/01/1992	2.0	-	-	-	-	-	-
MW1360Cr	06/01/1992	1.0	-	-	-	-	-	-
MW1360Cr	09/01/1992	1.0	-	-	-	-	-	-
MW1360Cr	12/01/1992	1 U	-	-	-	-	-	-
MW1360Cr	09/01/1993	1 U	-	-	-	-	-	-
MW1360Cr	09/01/1994	4.5	-	-	-	-	-	-
MW1360Cr	03/01/2000	1.0 U	-	-	-	-	-	-
MW1360Cr	09/12/2000	1.0 U	2.0	1.0 U	1.0 U	1.0 U	1.0 U	-
MW1430Cr	06/02/1986	1.0	-	-	-	-	-	-
MW1430Cr	06/12/1986	1.0	-	-	-	-	-	-
MW1430Cr	06/19/1986	1.0 U	-	-	-	-	-	-
MW1430Cr	06/27/1986	2.0	-	-	-	-	-	-
MW1430Cr	07/07/1986	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	-
MW1430Cr	07/10/1986	1.0	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	-
MW1430Cr	07/28/1986	1.0 U	-	-	-	-	-	-
MW1430Cr	07/30/1986	1.0 U	-	-	-	-	-	-



LEGEND

- MW-1  MONITORING WELL
- MW-665  NEIGHBORHOOD MONITORING WELL
- 160,000 TCE CONCENTRATION IN GROUNDWATER (ug/L) PRE-REMEDIATION
-  TCE ISOCONCENTRATION CONTOUR IN MICROGRAMS/LITER (ug/L)

APPROXIMATE SCALE IN FEET



PNG ENVIRONMENTAL, INC.

6665 SW Hampton St., Ste. 101 TEL (503) 620-2387
Tigard, OR 97223 FAX (503) 620-2977

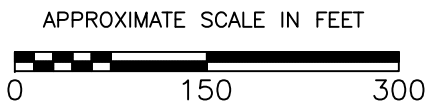
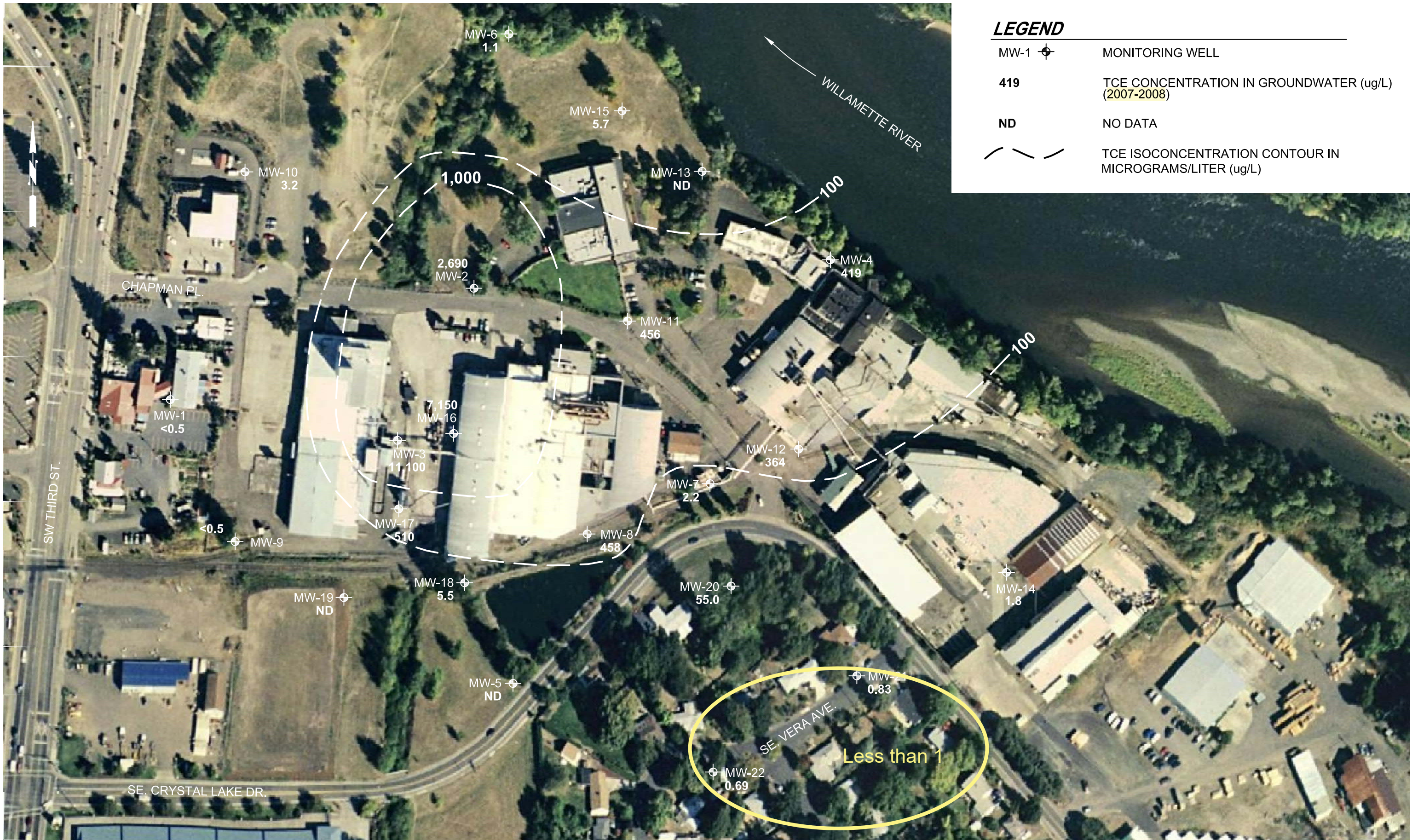
DATE: 3-23-09
FILE NAME: 1122-03
DRAWN BY: JJT
APPROVED BY:

EVANITE TECHNICAL SUPPORT
CORVALLIS, OREGON

PRE-REMEDIAL
TCE IN GROUNDWATER

Project No.
1122-03

Figure No.
5



PNG ENVIRONMENTAL, INC.
6665 SW Hampton St., Ste. 101
Tigard, OR 97223

DATE: 3-23-09
FILE NAME: 1122-03
DRAWN BY: JJT
APPROVED BY:

EVANITE TECHNICAL SUPPORT
CORVALLIS, OREGON

Figure No. 4

Project No. 1122-03

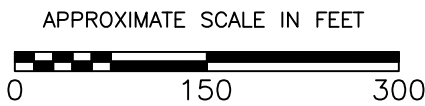
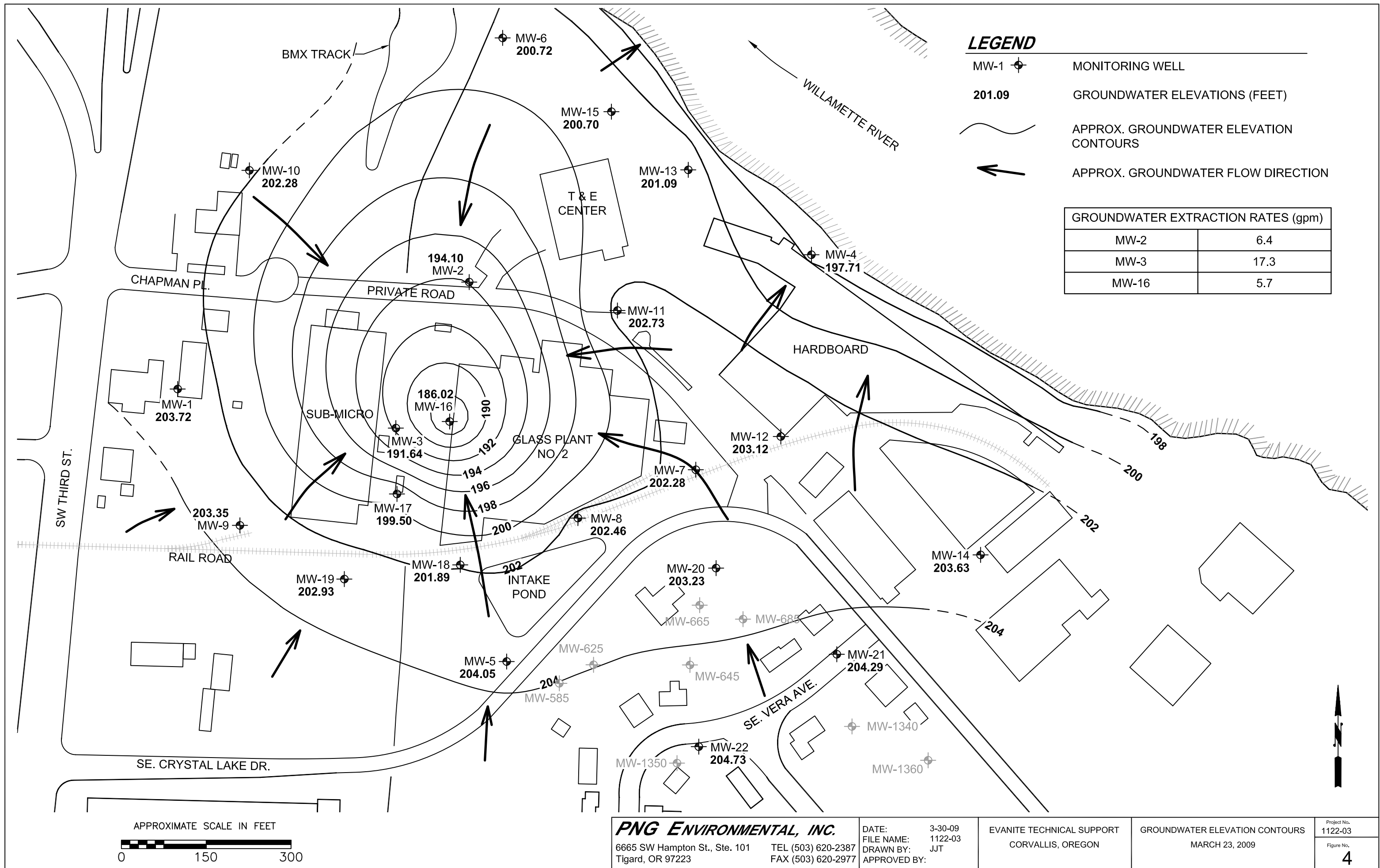
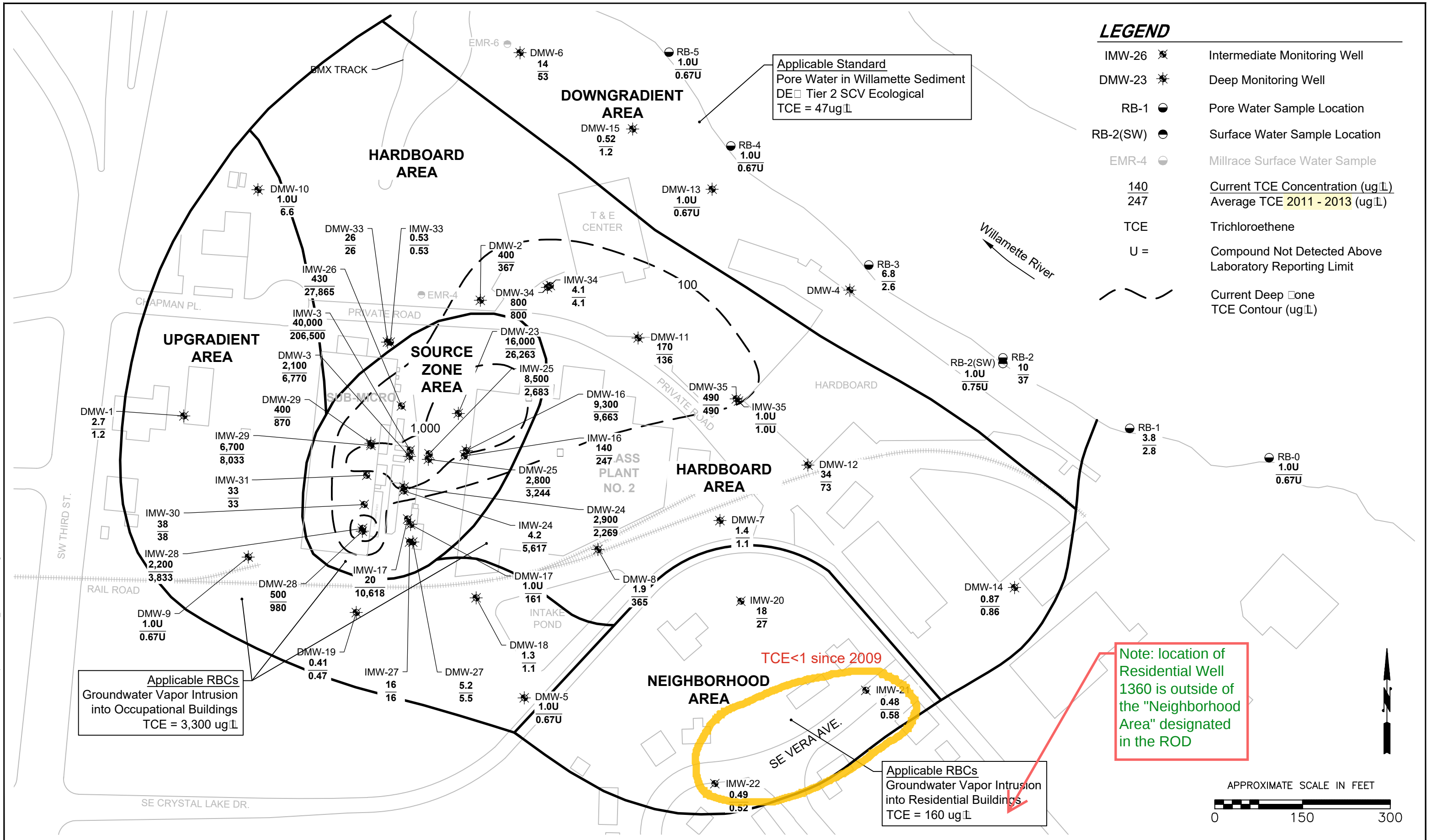


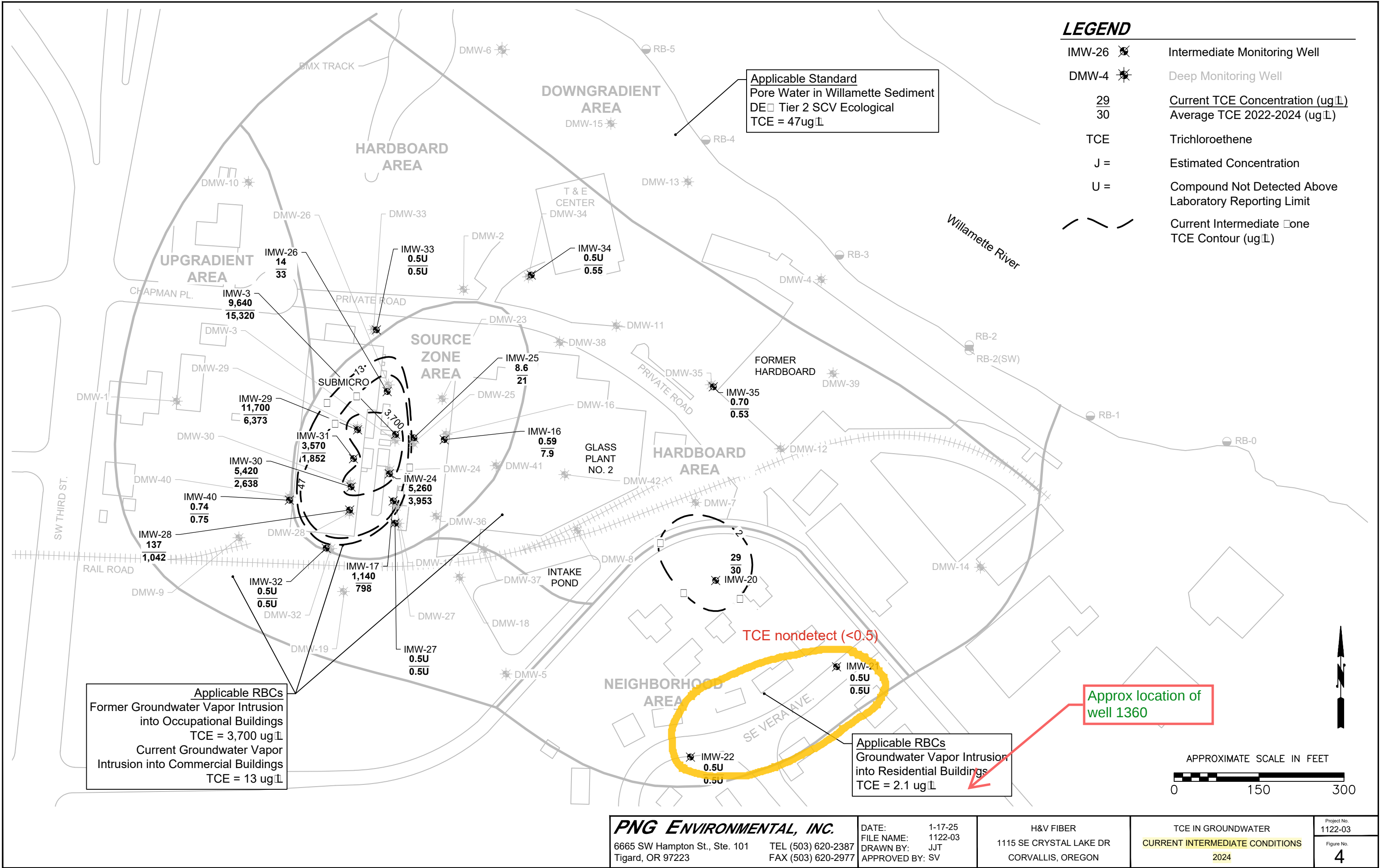
Table 5
Neighborhood Area Wells Groundwater Analytical Results - VOCs (ug/L)
H&V Fiber Corporation
Corvallis, Oregon

Well	Date	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	1,1-Dichloroethene	1,1-Dichloroethane	Vinyl chloride
IMW-21 Duplicate (MW-99)	01/05/2009	0.5 U	0.83	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	03/23/2009	0.39 J	0.87	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	06/01/2009	0.28 J	0.68	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/14/2009	0.5 U	0.78	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	12/03/2009	0.28 J	0.63	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	12/03/2009	0.33 J	0.67	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	03/24/2010	0.23 J	0.67	0.5 U	0.5 U	0.5 U	-	0.5 U
	03/22/2011	0.27 J	0.68	0.5 U	0.5 U	0.5 U	-	0.5 U
	09/26/2011	0.5 U	0.65	0.5 U	0.5 U	0.5 U	-	0.5 U
	07/12/2012	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	-	0.5 U
	09/04/2013	1 U	0.48 J	1 U	1 U	1 U	-	1 U
	09/22/2014	1 U	0.47 J	1 U	1 U	1 U	-	1 U
	09/01/2015	1 U	0.49 J	1 U	1 UJ ¹	1 UJ ¹	-	1 U
	09/13/2016	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/18/2017	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/11/2018	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/11/2019	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/17/2020	0.5 U	0.52	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/02/2021	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/08/2022	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/08/2023	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/24/2024	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 UJ ¹
IMW-22 Duplicate (MW-99)	01/05/2009	0.5 U	0.69	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	03/23/2009	0.5 U	0.63	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	06/01/2009	0.5 U	0.52	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/14/2009	0.5 U	0.58	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	12/03/2009	0.5 U	0.48 J	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	03/24/2010	0.5 U	0.49 J	0.5 U	0.5 U	0.5 U	-	0.5 U
	03/22/2011	0.5 U	0.56	0.5 U	0.5 U	0.5 U	-	0.5 U
	09/26/2011	0.5 U	0.56	0.5 U	0.5 U	0.5 U	-	0.5 U
	07/12/2012	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	-	0.5 U
	07/12/2012	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	-	0.5 U
	09/04/2013	1 U	0.49 J	1 U	1 U	1 U	-	1 U
	09/22/2014	1 U	1 U	1 U	1 U	1 U	-	1 U
	09/01/2015	1 U	1 U	1 U	1 UJ ¹	1 UJ ¹	-	1 U
	09/13/2016	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/18/2017	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/11/2018	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/11/2019	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/17/2020	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/02/2021	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/08/2022	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/08/2023	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
	09/23/2024	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 UJ ¹

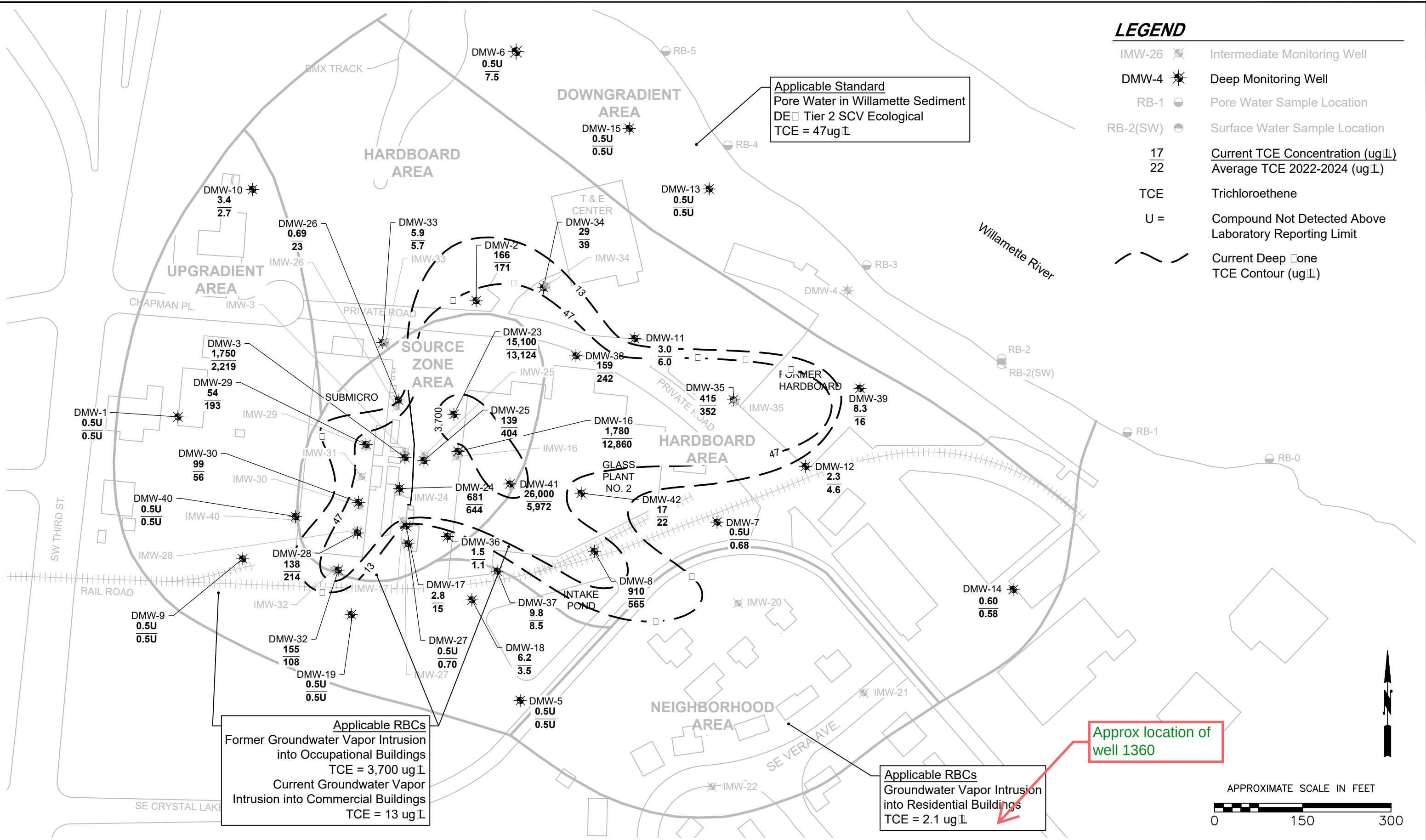
\\10.1.1.10\project\Autocad\1122-03 Evantia\2014\Sept 2014\1122-03_TCE-091914.dwg 2.17.2014



I:\Autocad Files\PNG-Autocad\1122-03_Evanile\2025\Jan 2025\1122-03_TCE-010825.dwg



I:\Autocad Files\PNG-Autocad\1122-03 Evanile\2025\Jan 2025\1122-03_TCE-010825.dwg



PNG ENVIRONMENTAL, INC.

6665 SW Hampton St., Ste. 101 Tigard, OR 97223
TEL (503) 620-2387 FAX (503) 620-2977

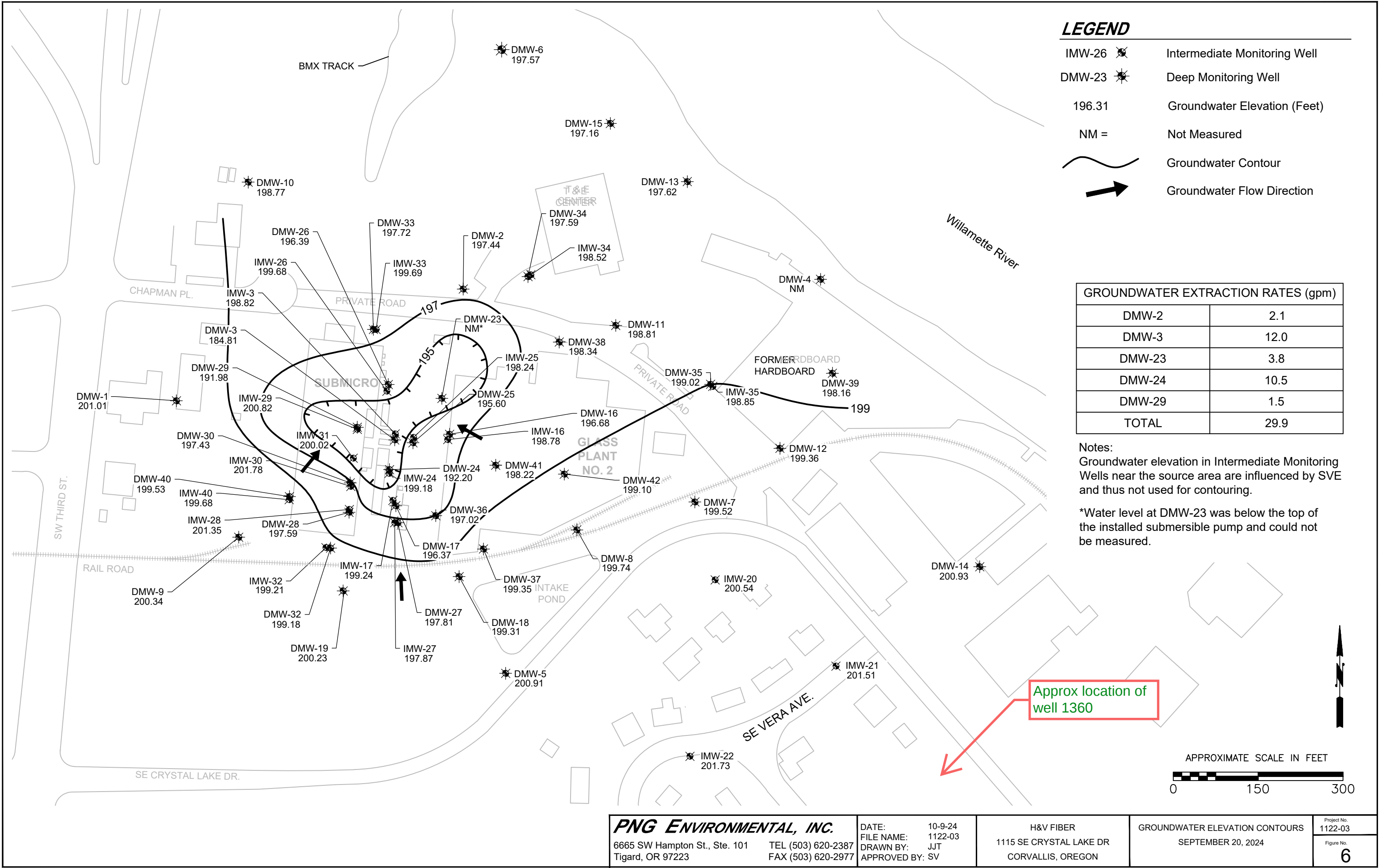
DATE: 1-17-25
FILE NAME: 1122-03
DRAWN BY: JJT
APPROVED BY: SV

H&V FIBER
1115 SE CRYSTAL LAKE DR
CORVALLIS, OREGON

TCE IN GROUNDWATER
CURRENT DEEP CONDITIONS
2024

Project No.
1122-03
Figure No.
5

I:\Autocad Files\PNG-Autocad\1122-03 Evantle\2024\Oct 2024\1122-03_GW-100924.dwg



PRELIMINARY ASSESSMENT REPORT

Mayberry Groundwater Plume
Corvallis, Oregon

TDD: 03-08-0011

Submitted To:

Joanne Labaw, Task Monitor
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

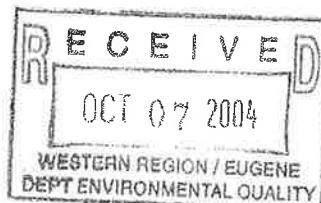
Prepared By:

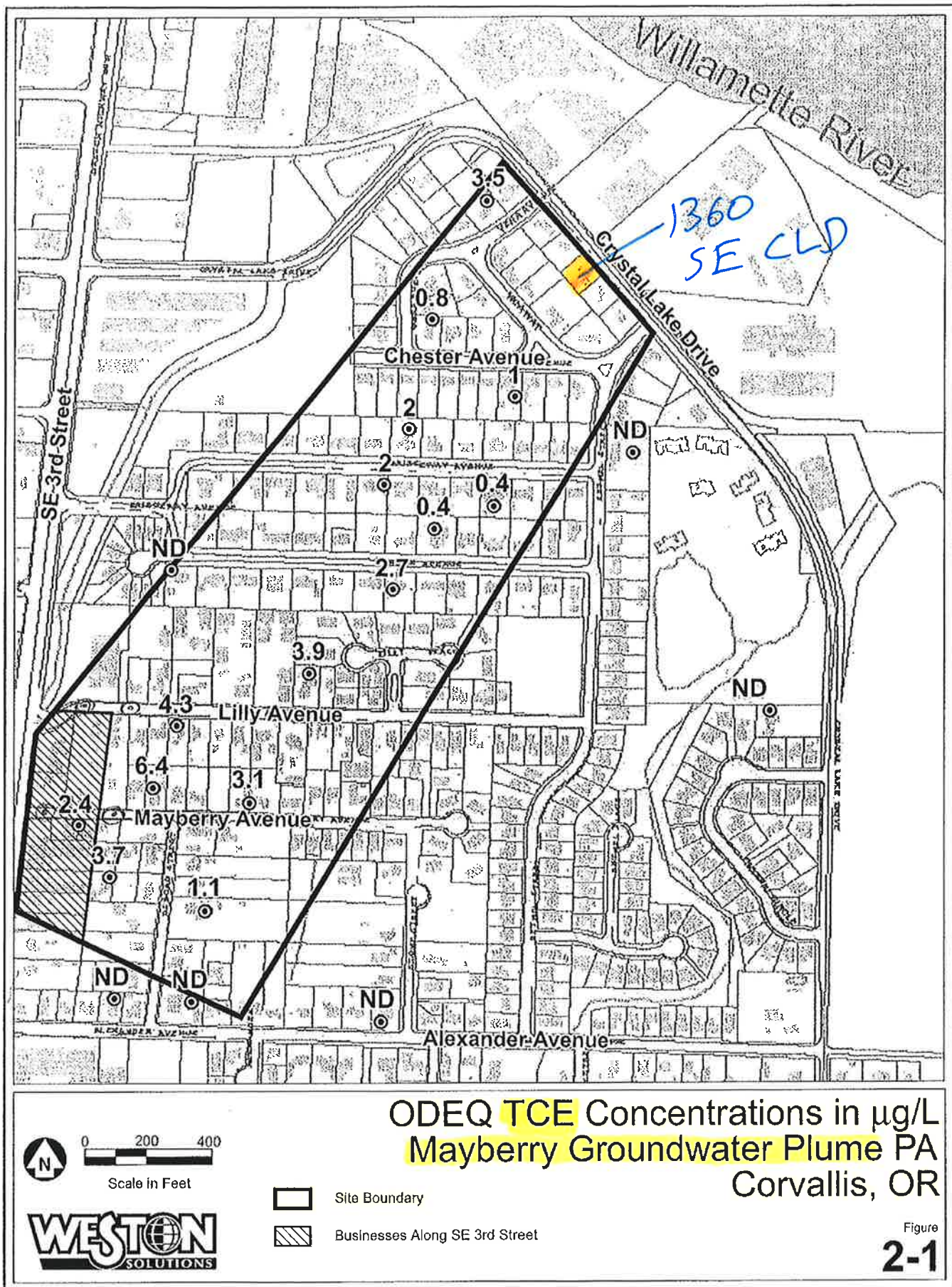
Weston Solutions, Inc.
190 Queen Anne Avenue North, Suite 200
Seattle, WA 98109-4926

August 2004

Contract No: 68-S0-01-02
Weston Work Order No.: 12644-001-002-0146-00
Weston Document Control No.: 12644.001.002.AAVS

APPROVALS			
TITLE	NAME	SIGNATURE	DATE
EPA Task Monitor	Joanne LaBaw		
START Project Manager	Greg Stuesse		8/24/04
START QA Officer	Paul Swift		8/23/04





State of Oregon
Department of Environmental Quality

Memorandum

Date: October 22, 2018

To: FILE

Through: Bruce Scherzinger, RG Leadworker
Michael E. Kucinski Manager, Western Region Environmental Cleanup

From: Chris Richardson, E.I.T. *BR*
Western Region

Subject: Mayberry Street Study Area, ECSI #3769; Staff Memorandum in support of a No Further Action determination

This document presents the basis for the Oregon Department of Environmental Quality's (DEQ's) recommended No Further Action (NFA) determination for the Mayberry Street Study Area, in Corvallis. As discussed in this report, contaminant concentrations in soil and groundwater are below acceptable risk levels.

The proposed NFA determination meets the requirements of Oregon Administrative Rules Chapter 340 Division 122, Sections 010 to 0140 and ORS 465.200 through 465.455.

The proposal is based on information documented in the administrative record for this site. A copy of the administrative record index is presented at the end of this report.

1. BACKGROUND

Site location.

The site is a large area encompassing approximately 69 acres and can be described as follows:

- Generally bounded by SE Crystal Lake Drive, SE Alexander Avenue, and SW 3rd Street. In a roughly rectangular area oriented in a southwest to northeast direction.
- Latitude 44.548176° North, longitude 123.260992° West
- A map showing the approximate boundaries of the study area is present as Figure 1.

Site setting.

The study area is approximately 69 acres and consists primarily of residential properties, however there are a few business located along SW 3rd Avenue. Commercial uses currently include, a moving and storage company, several small restaurants, and an automotive repair shop. The study area includes about a mile and a half of paved road and countless residences.

The study area encompasses a variety of zoning designations including RS-3.5, RS-5 (low density residential), RS-9, RS-12 (medium density residential), P-AO (professional and administrative office), and NC-Minor (minor neighborhood center).

Physical setting.

Elevations across the study area vary but range between 225 and 235 feet above mean sea level. Generally the area is fairly flat however there is a slight slope to the south toward SE Alexander Avenue. The regional geology in this area is flat with an overall slope toward the Willamette River east and northeast of the site.

Regional geology is mapped by the USGS as Holocene aged alluvial deposits: "Sand, gravel, and silt forming flood plains and filling channels of present streams. In places includes talus and slope wash. Locally includes soils containing abundant organic material, and thin peat beds."

The USDA soil maps indicate five different soil units across the site:

- Willamette silt loam, 0 to 3 percent slopes (42.5%)
- Malabon silty clay loam, rarely flooded, 0 to 3 percent slopes (33.0%)
- Dayton silt loam, 0 to 2 percent slopes (16.8%)
- Waldo silty clay loam, 0 to 3 percent slopes (5.0%)
- Coburg silty clay loam, rarely flooded, 0 to 3 percent slopes (2.7%)

The major soil components are similar and are described by the USDA as very deep, well drained soils that formed in silty glaciolacustrine deposits and mixed alluvium. These soils can be used for a wide range of crops such as fruit and nut tree, berries, vegetables, clover, alfalfa, grains and grass for seed.

Based on well logs in the area groundwater is present between 7 and 35 feet below the ground surface and flows to the northeast toward the Willamette River. Millrace Creek is the closest surface water feature and flows to the southwest, parallel to the northwestern edge of the site. It flows into Mary's River about 0.4 miles west of the site.

Site history.

The site is a large area south of the City of Corvallis and development has occurred over time. A 1913 topographic map indicates the site had one or two buildings present within the vicinity of the site however the land may have been used for farming or as a pasture. Topographic maps indicate that some development occurred especially at the southern end of the site between 1937 and 1942. By 1948 most of the infrastructure that currently exists had been built. Since that time topographic maps and aerials indicate that more lots have been developed and there has been an increase in residential density.

2. BENEFICIAL LAND AND WATER USE DETERMINATIONS

Land use.

Currently there are six different zoning designations within the boundary of the site. Due to the size of the site a number of different zoning designations are expected to remain in the future. Currently, along SW 3rd Street (Highway 99W) are businesses within the site. The businesses are currently zoned either neighborhood community minor or professional and administrative office. Commercial use along the highway is expected to continue into the future. The remaining area of the site contains several different zoning designations however they are all either low or medium density residential designations.

Groundwater use.

The City of Corvallis provides water access to all properties within the study area. Figure 3 is taken from the City of Corvallis GIS website and shows that water and sewer lines run along all of the roads in the study area and that any location could connect to the city water supply.

In a 2001 beneficial water use survey a total of 29 wells were identified in the area. Out of the 29 identified wells, 17 were reportedly used for consumptive purposes and the remaining 12 were used only for irrigation.

In 2018 a search of the Oregon Water Resources Department database showed a total of 146 water wells within Township 12S Range 5W Sections 02 and 11 which both cover the site and surrounding areas. Four wells were identified within the study area and an additional four wells were found within a few hundred yards of the survey area. Based on DEQ's previous work on this project an additional two wells are known to exist within the study area.

A beneficial water use survey was mailed to properties within and immediately around the study area where wells were known or suspected to be present based on historical sampling events and the current information in the Water Resource Department Database discussed above. Water use survey letters were sent to 25 properties and 10 of those properties responded, representing 40% of the surveys. The surveys identified three properties outside of the study area that use the water for domestic and irrigation purposes. No other responses indicate that groundwater is used in the area.

On October 2, 2018 Neil Knight with the City of Corvallis was able to confirm many of the previously sampled wells are now connected to the city water system. These properties include 120, 122, 305, 445 Mayberry Street, 630, 665 Atwood Ave, 6415 Bridgeway Ave, 2045 Debord St, and 525 Lilly Ave. Since these properties are connected to the city water system, no beneficial use of the groundwater is assumed at these properties.

Known wells within the study area:

415 SE Alexander Ave, Corvallis, OR 97333 (BENT5151)
2020 SE Debord St, Corvallis, OR 97333 (BENT5137)
310 SE Lilly Ave, Corvallis, OR 97333 (BENT52918)
475 SE Atwood Ave, Corvallis, OR 97333 (BENT5143)
120 SE Mayberry St, Corvallis, OR 97333 (Unknown)
570 SE Bridgeway Ave, Corvallis, OR 97333 (Unknown)
2095 Debord St, Corvallis OR 97333 (Unknown)
220 SE Craig Ave, Corvallis OR 97333 (Unknown)
520 SE Vera Ave. Corvallis, OR 97333 (Unknown)
540 SE Vera Ave. Corvallis, OR 97333 (Unknown)
630 Chester Ave. Corvallis, OR 97333 (Unknown)
665 Atwood Ave. Corvallis, OR 97333 (Unknown)

Known wells near study area:

560 SE Vera Ave, Corvallis, OR 97333 (BENT50879)
820 SE Atwood Ave, Corvallis, OR 97333 (BENT54528)
2045 SE 3rd St, Corvallis, OR 97333 (BENT5138)
1551 SE Crystal Lake Dr, Corvallis, OR 97333 (BENT4744)
2340 SE Crystal Lake Dr, Corvallis, OR 97333 (Unknown)

Yellow highlighted wells are used domestically and the green highlighted well is used only for irrigation.

Surface water use.

Millrace Creek is the nearest source of surface water and is located immediately northwest of the study area. Crystal Lake is located about 1,800 feet southeast of the site. Mary's River is located about 1,900 feet west of the site and flows north where it joins the Willamette River. The Willamette River is located about 450 feet northeast of the site at its closest and flows to the north. There are no known beneficial uses of Millrace Creek. However, there is fishing and other recreational use of Crystal Lake, Mary's River and the Willamette River.

According to the City of Corvallis Public Utility Department, surface water runoff in the study area is controlled by the city storm sewer system which connects lines along the streets to a main pipe running along SE 3rd Street. The main pipe discharges into Millrace Creek.

3. INVESTIGATION AND CLEANUP WORK

In April 2001, the owner of a residence at 570 Bridgeway Ave. asked DEQ to sample her well because of concerns about TCE from a nearby industrial site (Evanite -ECSI #40). TCE was detected at 2 µg/L in this resident's well water. After subsequent sampling of 22 other domestic and irrigation wells in 2001, DEQ determined that there was a TCE source up gradient of Evanite, possibly along 3rd St. Fifteen residential wells in the area along Bridgeway, Atwood, Debord, Mayberry, and Lilly Streets were found to contain TCE. Seven of those wells contained TCE at levels that exceeded the DEQ RBC for residential tap water ingestion. DEQ provided carbon filtration systems to six of the seven residences and the seventh chose to connect to the city water system.

In February 2004, EPA conducted a preliminary assessment (PA) covering this area of south Corvallis. The purpose of the PA was to attempt to identify a source of the contamination. The PA did not include sampling, and EPA concluded that there were too few affected receptors for the agency to take further action under CERCLA. Also in February of 2004, DEQ declared the site an orphan because of the lack of information on the source of the contamination.

After carbon filtration systems were installed at impacted residents, sampling was conducted at least annually to assess the effectiveness of the filters. Maintenance as needed was conducted by contractor to change out spent carbon and perform other necessary maintenance to ensure the long term effectiveness of the systems. Between 2002 and 2006 three of the six residences with

filters connected to the city water system. The remaining three systems were maintained until July of 2018.

Samples have only been collected from drinking water wells. No soil, groundwater, or soil gas samples have been collected. The 2004 PA identified seven commercial properties as then current or historical potential sources of contamination. In the DEQ orphan declaration three of the seven identified properties were concluded to be the most likely potential sources of contamination. No source of contamination has been identified to date.

Nature and extent of contamination.

Trichloroethylene and cis-1, 2-Dichloroethene are the contaminants of interest within the study area. Based on available information, only groundwater has been impacted and there is no known source area of soil contamination.

The study area encompasses about 69 acres and can be seen on Figure 1. The area is roughly rectangular measuring about 2,800 feet by 950 feet. Historical detections of TCE have been detected across the study area, however other wells at the perimeter or just outside of the study area were below detectable concentrations.

The impacted aquifer appears to be unconfined shallow groundwater present between 7 and 35 feet below ground. Vertical delineation is hard to define because the domestic wells that have been sampled could be moving contamination up or down depending on the construction details of each well. Conservatively it is safe to assume that the entire shallow aquifer in the area was historically impacted.

4. RISK EVALUATION

Conceptual site model.

To evaluate human exposure to residual chemical contamination requires an assessment of the type and extent of that exposure. This is based on current and reasonably likely future site use. DEQ publishes risk-based concentrations (RBCs) for contaminants commonly encountered, for different types of exposure scenarios. These RBCs are conservative estimates of protective levels of contaminants in soil, groundwater and air. Table 1 shows potential exposure pathways and receptors for this site. Based on this, applicable RBCs are identified and used for risk screening.

Table 1. Identification of applicable RBCs, based on pertinent pathways and receptors

	Pathway	Receptor	Is Pathway Complete?	Is RBC Exceeded?	Comments
Soil	Ingestion, Dermal Contact and Inhalation	Residential	No	No	No known soil impacts or source of contamination. Pathway assumed incomplete until new information arises.
		Urban Residential	No	No	
		Occupational	No	No	
		Construction Work	No	No	
		Excavation Worker	No	No	
	Volatilization to Outdoor Air	Residential	No	No	No known soil impacts or source of contamination. Pathway assumed incomplete until new information arises.
		Urban Residential	No	No	
		Occupational	No	No	
	Vapor Intrusion Into Buildings	Residential	No	No	No known soil impacts or source of contamination. Pathway assumed incomplete until new information arises.
		Urban Residential	No	No	
		Occupational	No	No	
	Leaching to Groundwater	Residential	No	No	No known soil impacts or source of contamination. Pathway assumed incomplete until new information arises.
		Urban Residential	No	No	
		Occupational	No	No	
Groundwater	Ingestion & Inhalation From Tap Water	Residential	Yes	No	See Comments Below
		Urban Residential	Yes	No	
		Occupational	Yes	No	
	Volatilization to Outdoor Air	Residential	Yes	No	Concentrations are below all RBCs
		Urban Residential	Yes	No	
		Occupational	Yes	No	
	Vapor Intrusion Into Buildings	Residential	Yes	No	Concentrations are below all RBCs
		Urban Residential	Yes	No	
		Occupational	Yes	No	
	Groundwater in Excavation	Occupational	Yes	No	Concentrations are below all RBCs
Ecological		Terrestrial & Surface Water	Yes	No	No known impacts to surface soils, surface water, or aquatic sediments. Highest groundwater concentrations are well below all ecological screening values

All soil pathways have been deemed incomplete because there are no known soil impacts and no source or sources have been identified. Groundwater concentrations are below all RBCs for the volatilization to outdoor air, vapor intrusion, and groundwater in excavation pathways.

Groundwater ingestion for residential receptors is the primary concern within the study area. There are three known wells that continue to have detectable concentrations of TCE in their water. Two of the wells have taken ownership of the treatment systems that DEQ originally installed in 2001. These property owners have been informed of the monitoring and maintenance needs of these systems. Future risk to these residents is acceptable based on historical information showing the effectiveness of the carbon filtration systems and that the residents will

continue to monitor and maintain the filtrations systems themselves. The remaining impacted well is no longer used and that property is connected to the city system.

Ecological risks are further described below under the Ecological Risk section.

Contaminant concentrations.

Attached is a table (Table 1) showing the maximum concentrations for both of the Contaminants of Interest (COIs) for the study area. The table also shows the applicable exposure pathways and RBCs for the listed COIs based on the conceptual site model above. Where the maximum concentration for a contaminant exceeds and applicable RBC then that RBC is highlighted in red. Because groundwater concentrations change over time, sometimes significantly so, only the last four years of sampling data was screened in order to keep data current.

As Table 1 indicates, the maximum concentration detected of TCE (1.97 ug/L) is above the residential RBC of 0.49 ug/L. Concentrations of cis-1,2-dichloroethene have always been below the applicable RBCs which are higher than for TCE. Long-term data from impacted wells is only available for the three wells that have had treatment systems. Between 2002 and 2009 data is unavailable because no unfiltered samples were collected, likely to save costs, limiting sampling to what was necessary to maintain the filters.

Overall, since the discovery of the contamination in 2001, concentrations have declined and will likely continue to decline. Attached are three figures showing the concentration trend over time for TCE in the three wells. Additionally, three of the last five years, the well at 570 Bridgeway Avenue has been non-detect for VOCs. 570 Bridgeway is located the farther down gradient of the three properties with filters. This further implies that the contaminant plume is decreasing and/or naturally attenuating.

Human health risk.

There does not appear to be unacceptable health risk from the solvent contamination within the Mayberry Street Study Area. There are two known impacted residential wells within the study area. Additionally there is one well used for irrigation which had a historical detection of TCE.

In a well survey the resident at 630 Chester Ave. indicated the well is only used for irrigation. A sample from this well in 2001 showed TCE was present in the well at a concentration of one microgram per liter (µg/L or part per billion). This property is about 500 feet northeast (down gradient) of 570 Bridgeway Ave which has not had detectable levels of TCE for three of the last four years. This indicates the down gradient edge of the contaminant plume is likely up gradient of 630 Chester Ave. Given the limited exposure to potential impacted water only during irrigation and that concentrations across the apparent plume have declined, there is no unacceptable risk from groundwater exposure at this property.

The two impacted residential wells owners have accepted the carbon filtration system equipment and are responsible for maintaining the systems that have proven effective at removing the COIs in the groundwater. The systems were originally installed, sampled, and maintained by DEQ. The systems have shown to effectively remove contaminants to below laboratory detection

limits. DEQ sent multiple letters to the property owners that DEQ would be discontinuing the maintenance of these filters. The letters informed the owners that city water is available in front of their property and that they could connect to the city water supply, take ownership of the filters, or drink impacted groundwater. The owners chose to take ownership of the treatment systems and be responsible for monitoring and maintaining the systems which eliminate the risk of exposure.

Ecological risk.

The EPA PA identified several significant species along Mary's River and the Willamette River. Included in those are the chinook and steelhead salmon which are federally listed threatened species. Impacted groundwater is flowing to the northeast where it likely discharges to the Willamette River. Based on the declining to non-detect concentrations seen at 570 Bridgeway Avenue, limited or no future exposure of contaminants to the Willamette River or aquatic sediments is expected to occur. Additionally, the maximum concentration of TCE in groundwater is several orders of magnitude below all DEQ ecological screening levels. Since there is no known area of soil contamination, ecological soil exposure is considered incomplete. Based on all of this, ecological risk from the Mayberry Street Study Area is acceptable.

5. RECOMMENDATION

Following investigation, treatment, and long term monitoring of groundwater, risk levels are not exceeded, and a No Further Action determination is recommended for this site. The No Further Action determination should be recorded in DEQ's ECSI database (ECSI # 3769).

6. ATTACHMENTS

Figures:

1. Site Location Map
2. City of Corvallis Zoning Map
3. City Utility Map
4. Known Beneficial Groundwater Users
5. Graph of TCE Concentration Over Time – 120 Mayberry
6. Graph of TCE Concentration Over Time – 310 Lilly
7. Graph of TCE Concentration Over Time – 570 Bridgeway

Tables:

1. Applicable DEQ Risk Based Concentrations
2. Sampling Data Summary

Figure 1

Site Location Map Showing Approximate Boundaries of the Study Area



Figure 2.
Mayberry Street Area Zoning Map

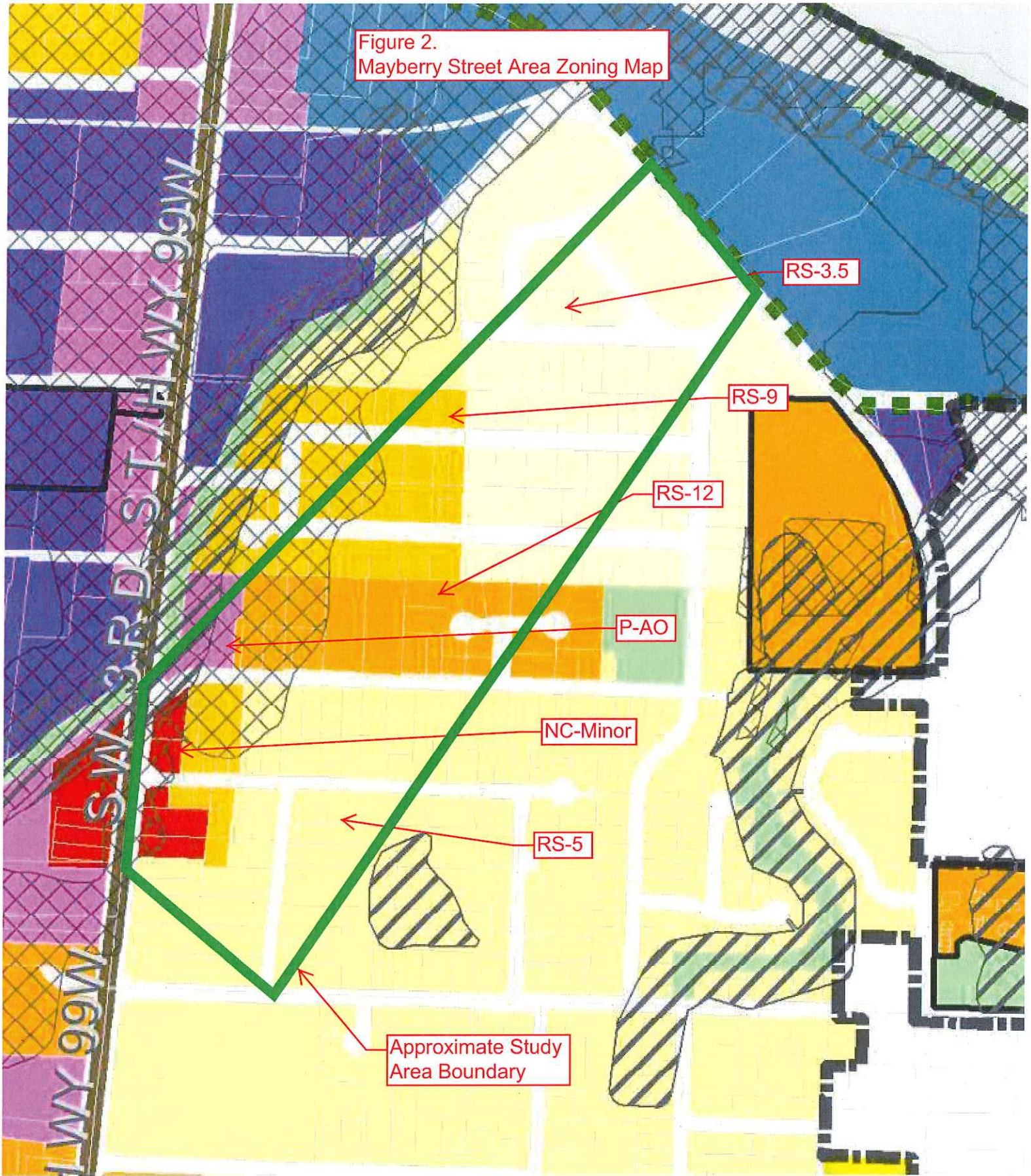
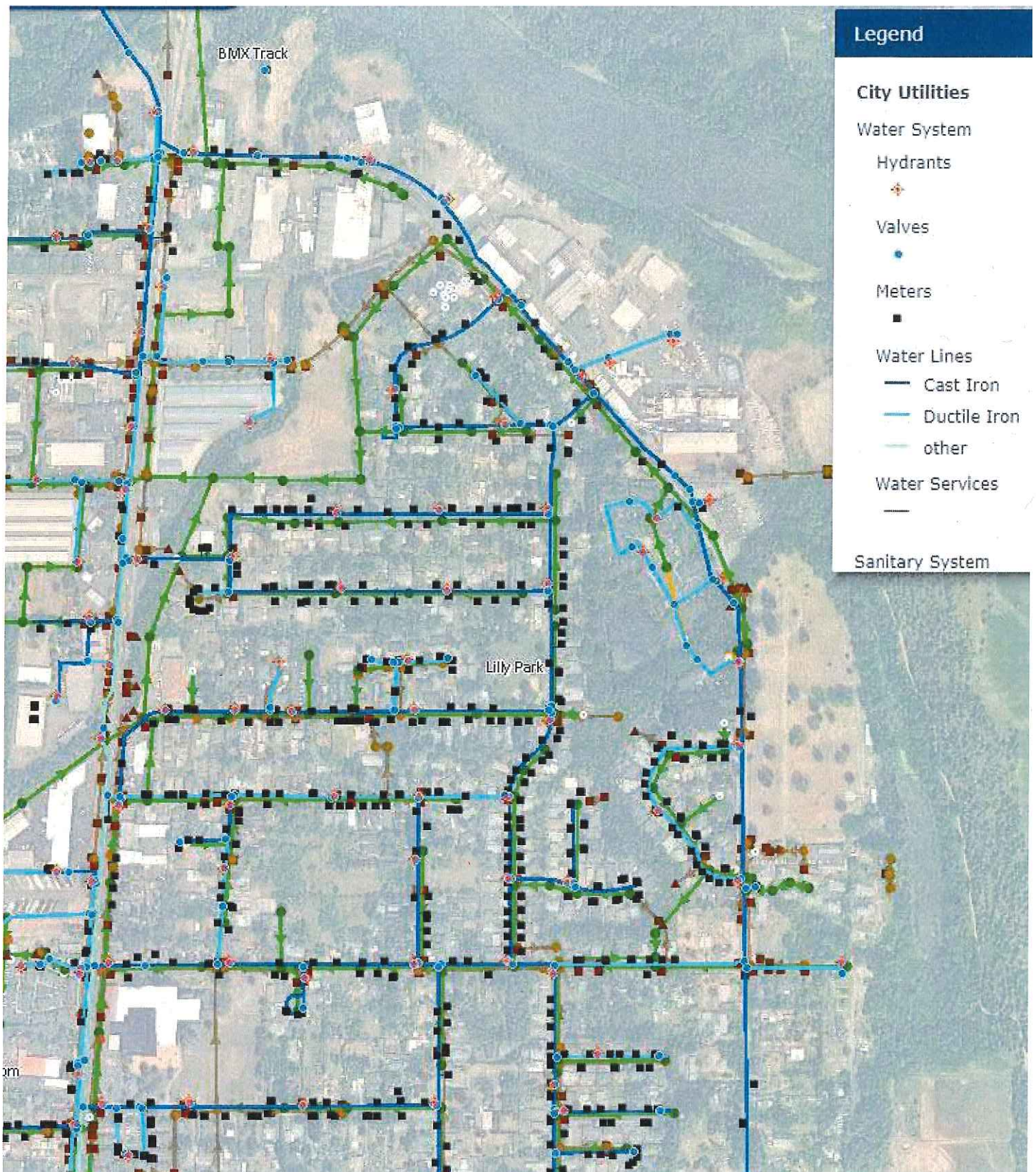


Figure 3.
City of Corvallis Utility Map



Source: : <https://corvallisoregon.maps.arcgis.com/apps/webappviewer/index.html?id=d098de302300453eaaf0c506b289c0f5>

Figure 4

Known Beneficial Users of Groundwater



Figure 5
120 Mayberry TCE (ug/L)

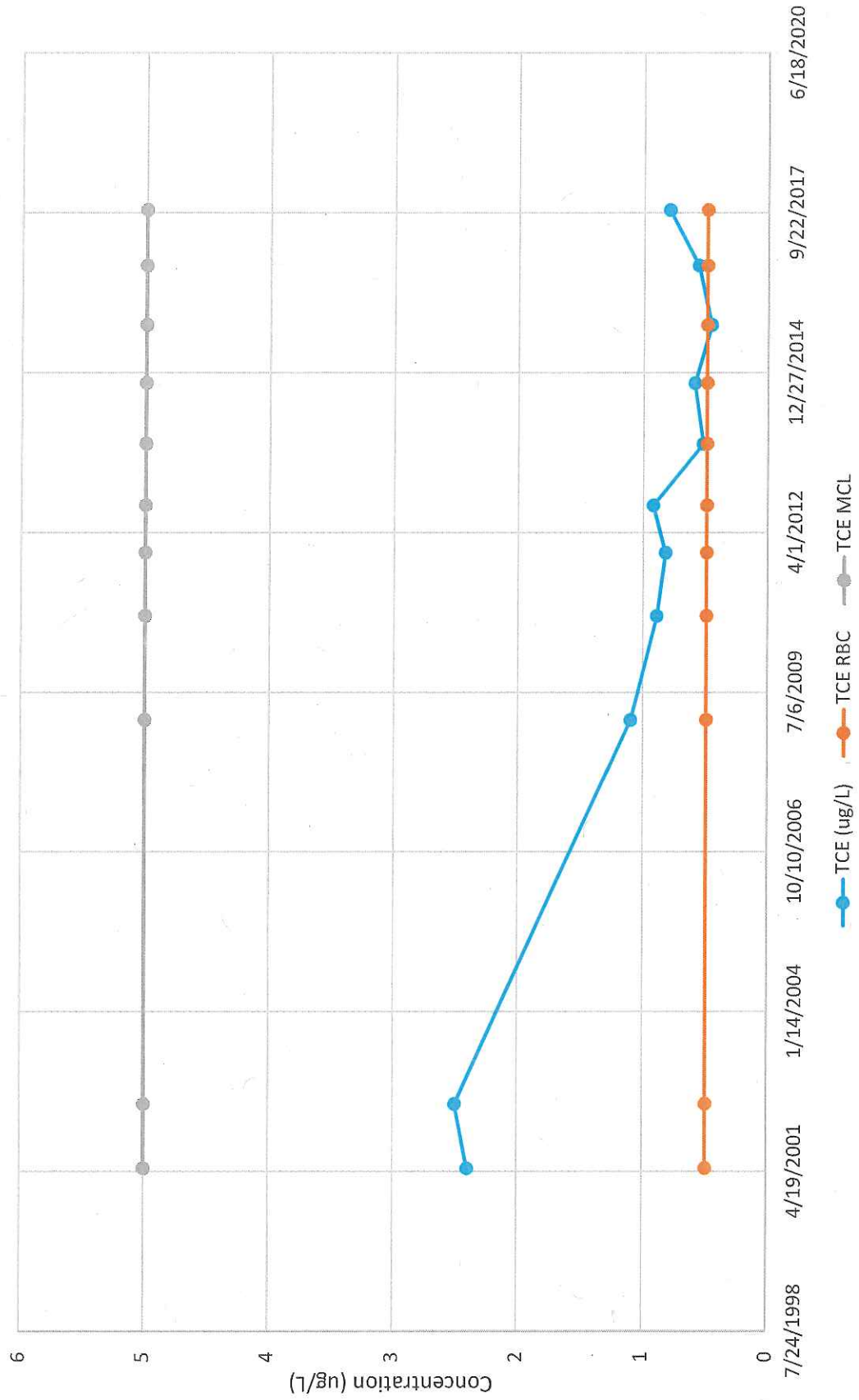


Figure 6
310 Lilly TCE (ug/L)

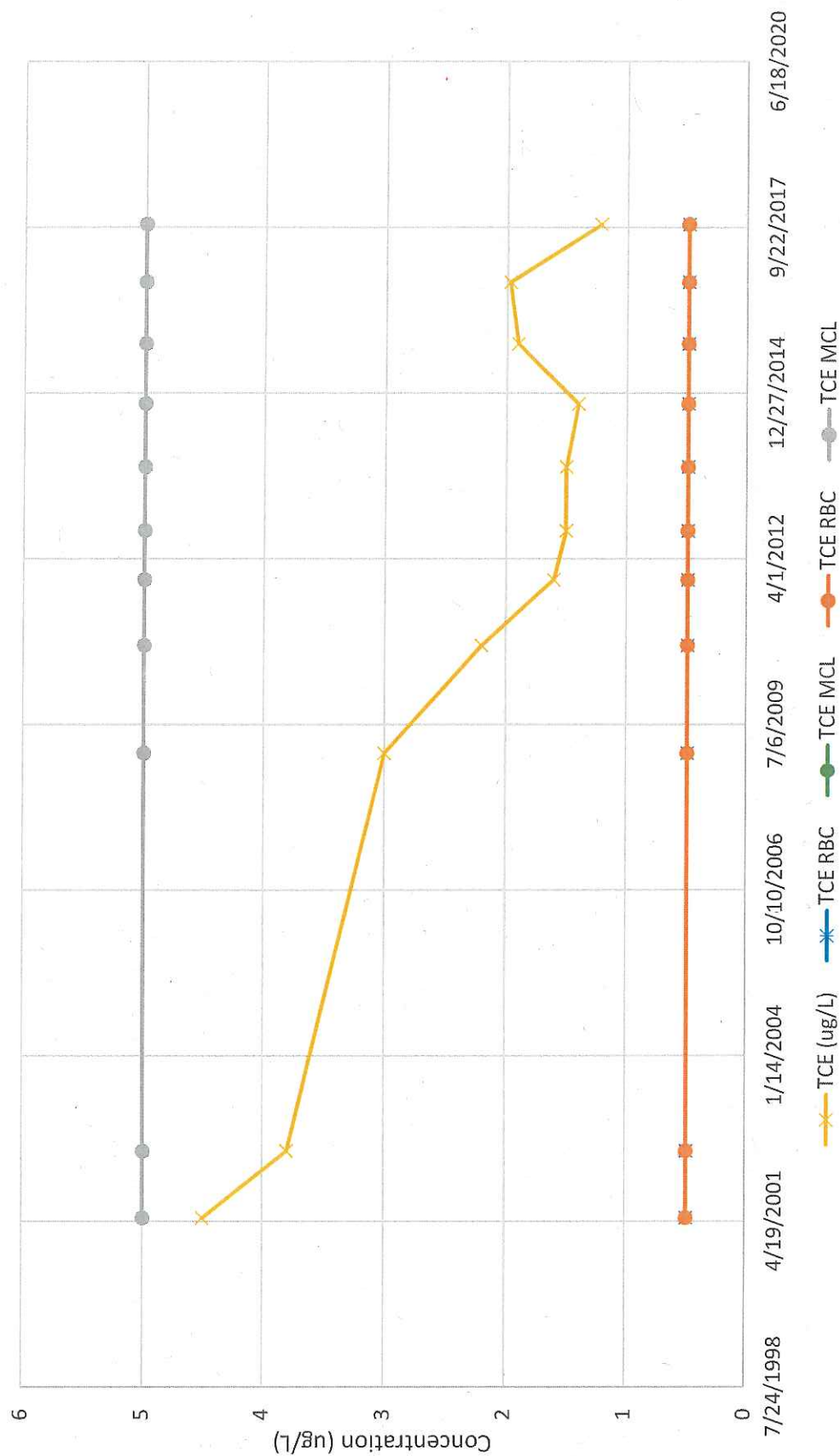
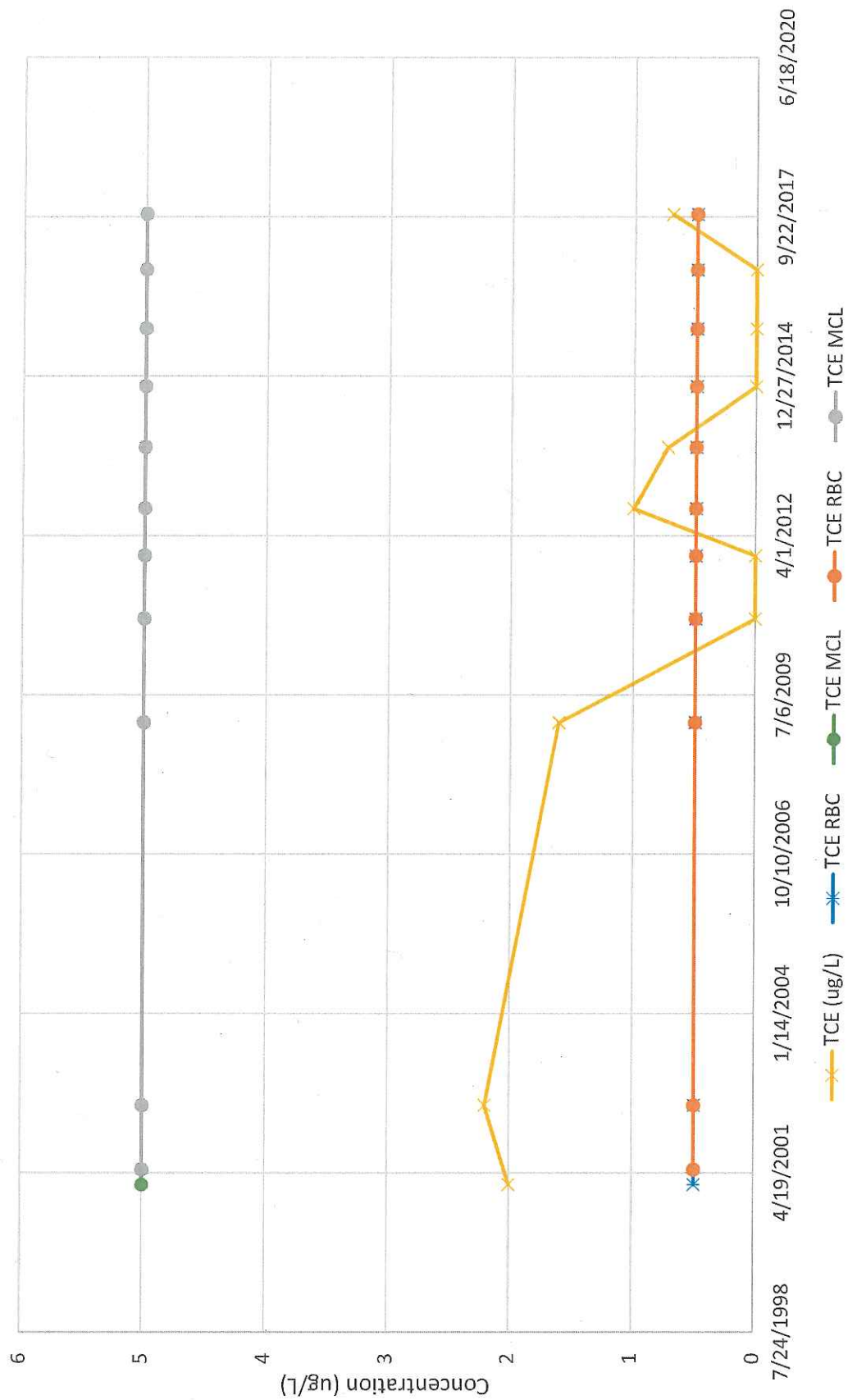


Figure 7
570 Bridgeway TCE (ug/L)



Maximum Concentration					Contaminated Medium			GROUNDWATER	GROUNDWATER	GROUNDWATER	GROUNDWATER	GROUNDWATER	GROUNDWATER	GROUNDWATER	GROUNDWATER	GROUNDWATER	GROUNDWATER	GROUNDWATER	GROUNDWATER	GROUNDWATER	GROUNDWATER			
								µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)	µg/L (ppb)
					Exposure Pathway			Ingestion, Dermal & Inhalation from Tapwater	Ingestion, Dermal & Inhalation from Tapwater	Ingestion, Dermal & Inhalation from Tapwater	Volatilization to Outdoor Air	Volatilization to Outdoor Air	Volatilization to Outdoor Air	Volatilization to Outdoor Air	Vapor Intrusion into Buildings	Vapor Intrusion into Buildings	Vapor Intrusion into Buildings	Vapor Intrusion into Buildings	Vapor Intrusion into Buildings	Vapor Intrusion into Buildings	Vapor Intrusion into Buildings	Vapor Intrusion into Buildings	Vapor Intrusion into Buildings	GW in Excavation
								RBC _{tw}	RBC _{tw}	RBC _{tw}	RBC _{wo}	RBC _{wo}	RBC _{wo}	RBC _{wo}	RBC _{wi}	RBC _{wi}	RBC _{wi}	RBC _{wi}	RBC _{wi}	RBC _{wi}	RBC _{wi}	RBC _{wi}	RBC _{wi}	RBC _{wi}
					Receptor Scenario			Residential	Urban Residential	Occupational	Residential	Urban Residential	Occupational	Residential	Urban Residential	Occupational	Residential	Urban Residential	Occupational	Residential	Urban Residential	Occupational	Residential	Urban Residential
Soil		Groundwater	Soil Gas	Air	Direct or Indirect Pathway (see notes)			DCW		DCW		DCW		IVW		IVW		IVW		IVW		DCW		
Surface	SubSurface				CASn	Chemical	Note		Note		Note		Note		Note		Note		Note		Note		Note	
		0.43			156-59-2	cis-1,2-Dichloroethene	nc, v	36		140		260		-	>S	-	>S	-	>S	-	>S	-	>S	18,000
		1.97			79-01-6	Trichloroethene	NA, v	0.49		2.0		3.3		3,300		6,900		20,000		200		430		430

Notes:

- 1 A zero (0) for the maximum concentration means the constituent was tested for but was not detected in any sample.
- 2 If the maximum concentration is blank, no samples were analyzed for that constituent in its respective media.

Table 2.
Mayberry Street Area Wide Sampling Summary

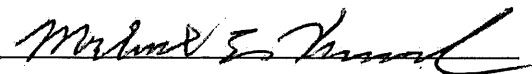
	Date	TCE (ug/L)	cis-1, 2-Dichloroethene (ug/L)	trans-1,2-Dichloroethene (ug/L)	Comment
120 Mayberry Pre	5/10/2001	2.4	ND	ND	Connected to City Water
	6/18/2002	2.5	0.1	ND	
	1/15/2009	1.1	ND	ND	
	10/28/2010	0.89	ND	ND	
	11/28/2011	0.82	ND	ND	
	9/19/2012	0.92	ND	ND	
	10/8/2013	0.52	ND	ND	
	10/24/2014	0.59	ND	ND	
	10/22/2015	0.457	ND	ND	
	10/26/2016	0.56	ND	ND	
	10/10/2017	0.795	ND	ND	
310 Lilly Pre	5/10/2001	4.5	0.3	ND	Using carbon filters
	6/18/2002	3.8	0.3	ND	
	1/15/2009	3	ND	ND	
	10/28/2010	2.2	ND	ND	
	11/28/2011	1.6	0.31	ND	
	9/19/2012	1.5	ND	ND	
	10/8/2013	1.5	ND	ND	
	10/24/2014	1.4	ND	ND	
	10/22/2015	1.9	0.332	ND	
	10/26/2016	1.97	0.43	ND	
	10/10/2017	1.22	0.285	ND	
570 Bridgeway Pre	2/5/2001	2	ND	ND	Using carbon filters
	6/18/2002	2.2	0.1	ND	
	1/15/2009	1.6	ND	ND	
	10/28/2010	NA	NA	NA	
	11/28/2011	NA	NA	NA	
	9/19/2012	1	0.32	ND	
	10/8/2013	0.72	ND	ND	
	10/24/2014	ND	ND	ND	
	10/22/2015	ND	ND	ND	
	10/26/2016	ND	ND	ND	
	10/10/2017	0.688	ND	ND	
645 Alexander	5/5/2001	1 U	NA	NA	Only Used for Irrigation
215 Alexander	5/5/2001	1 U	NA	NA	
630 Atwood	4/4/2001	2.7	NA	NA	Connected to City Water
665 Atwood	5/6/2001	0.4 J	NA	NA	Connected to City Water
230 Atwood	3/15/2001	1 U	NA	NA	
1575 Bethel	5/21/2001	1 U	NA	NA	
615 Bridgeway	5/7/2001	2	NA	NA	Connected to City Water
750 Bridgeway	5/6/2001	0.4 J	NA	NA	Connected to City Water
630 Chester	5/6/2001	1	NA	NA	Only Used for Irrigation
220 SE Craig	7/19/2001	3.7	NA	NA	Well Decommissioned
1820 Crystal Lake Dr	4/26/2001	1 U	NA	NA	
2095 Debord	5/10/2001	1 U	NA	NA	
2045 Debord	5/5/2001	1.1	NA	NA	Connected to City Water
525 Lilly	5/7/2001	3.9	NA	NA	Connected to City Water
445 Mayberry Ave	5/5/2001	3.1	NA	NA	Connected to City Water
305 Mayberry	4/30/2001	6.4	NA	NA	Connected to City Water
122 Mayberry	5/10/2001	2.4	NA	NA	Connected to City Water
2160 Thompson	4/26/2001	1 U	NA	NA	
520 SE Vera	4/26/2001	0.8	NA	NA	Do not use well
505 SE Vera	3/27/1987	5 U	NA	NA	

NA= Not Analyzed

ND= Non Detect

Memo

To: ECSI File #3769

From: Michael E. Kucinski 

Date: December 18, 2018

Subject: **No Further Action Determination for Mayberry Street Study Area**



State of Oregon
Department of
Environmental
Quality

Western Region
Cleanup and
Emergency Response

165 East 7th Ave, Ste. 100
Eugene, OR 97401
Phone: 541-686-7838
Fax: 541-686-7551
www.oregon.gov/DEQ

The Oregon Department of Environmental Quality (DEQ) has completed work on this Orphan project and developed a Staff Memorandum in support of a No Further Action determination, dated October 22, 2018. The Mayberry Street Study Area is generally bounded by SE Crystal Lake Drive, SE Alexander Avenue, and SW 3rd Street (Highway 99W) in Corvallis, Oregon. Below is a figure showing the approximate boundaries of the study area.

DEQ has determined that remedial action to address environmental contamination at the Mayberry Street Study Area is complete, and no further action is required. This determination is based on the DEQ regulations and the facts as we now understand them including, but not limited to the following:

- Area development began around the turn of the 20th century and developed over time into a primarily residential area with commercial businesses located along SW 3rd Street (Highway 99W).
- In 2001, following a request from a resident concerned about their drinking water, their well water was sampled for TCE contamination from a nearby cleanup site. DEQ sampled a total of 23 wells in the area and determined there was another unknown source of the contamination.
- The exact cause of the area-wide groundwater contamination is unknown. A source of contamination was never identified following a Preliminary Assessment performed by the EPA.
- Only groundwater in the area is known to be impacted. No soil impacts were identified.
- In 2001, carbon filtration systems were installed on seven residential wells with impacts exceeding DEQ's residential risk-based concentration for tap water ingestion. Over time, five of the residences connected to municipal water.
- DEQ monitored and maintained the various filtration systems until 2018. At that time, the remaining two systems were given to the property owners who acknowledged their ownership and responsibility for sampling and maintaining the filtration systems.
- Groundwater in the area remains contaminated although concentrations have declined to near DEQ's residential screening level. The remaining TCE plume appears to be shrinking based on the available long-term sampling data. There are only two beneficial users of the impacted groundwater and they have filtration systems that remove the contamination.
- Properties within the study area are expected to remain primarily residential with some commercial property use along SW 3rd Street (Highway 99W). Municipal water is available to every property within the study area. There is currently little beneficial use of the groundwater, which is expected to remain the same or decline in the future.
- Public notice/opportunity to comment was given to all residents within the study area and the public. No comments on the proposed closure were received during the one-month comment period.

Based on the available information, the Mayberry Street Study Area site is currently protective of public health and the environment. The site requires no further action under the Oregon

Environmental Cleanup Law, ORS 465.200 et seq. 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 Environmental Cleanup Site Information System (ECSI) database to reflect this decision.

This memo only applies to the release discussed above. If any contaminated soil or groundwater is encountered in the future, it must be handled and disposed of in accordance with local, state and federal regulations.

A copy of the staff memo supporting this No Further Action decision can be viewed at <https://www.deq.state.or.us/lq/ECSI/ecsiquery.asp> (Search for site number 3769).