

State of Oregon
Department of Environmental Quality

Memorandum

Date: May 29, 2025

To: FILE

Through: Don Hanson, RG, Lead worker
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Western Region Cleanup Program

From: Anthony B. Chavez, RG, Project Manager
Western Region Cleanup Program

Subject: Talent Urban Renewal, LUST #15-18-1359
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 Talent Urban Renewal Project Site located at 102-104 South Pacific Highway in Talent, Oregon. As discussed in this report, contaminant concentrations in soil, groundwater and soil gas are below the applicable risk levels identified for this site.

The proposed NFA determination meets the requirements of Oregon Administrative Rules Chapter 340, Division 122, Sections 0205 to 0360 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

The site's location can be described as follows:

- Address: 102 and 104 South Pacific Highway, Talent, in Jackson County Oregon
- Latitude 42°14'40" North, Longitude 122°47'03" West
- Township 38 South, Range 1 West, Section 23, Willamette Meridian
- Tax Map Number 381W23DC, Tax Lots 2401, 2700, 2800

Site setting.

The site is currently used as a temporary RV park for short-term, transitional housing by the City of Talent's Urban Renewal Agency (TURA). The site is located southwest of the intersection of South Pacific Highway and West Valley View Road and is comprised of three tax lots covering 4.23 acres. Adjoining properties are in light commercial and residential use. As part of the City of Talent's Gateway Housing Project, approximately 53 RVs were placed across the property,

housing area residents who were displaced by the 2020 Alameda wildfire. The ground surface is flat and mostly covered by asphalt.

Physical setting.

- Elevation of the site is approximately 1,600 feet above mean sea level.
- Topography is flat at the site, with a regional gradient sloping slightly to the north and east.
- According to onsite environmental investigations, depth to groundwater was encountered between approximately 8 and 14 feet below ground surface (bgs).
- Site geology consists of unconsolidated alluvial deposits, containing clays, sands, and gravels.
- Wagner Creek is located approximately 300 feet to the south and Bear Creek is situated approximately 0.30-miles to the east of the site.
- Groundwater in the vicinity of the site is anticipated to flow east towards Bear Creek.

Site history.

Earliest historical records indicate the site was developed for agricultural use by 1936. Aerial photographs from that time indicate a few surrounding properties appeared to be orchards. However, based on the historical photos, the site did not appear to have been used as an orchard. During the late 1930's the northern portion of the site was owned by a logging contractor, Skeeters and Skeeters, Inc. According to a 2016 AEC Phase I report, the precise use of the site by the logging contractor was unknown, but it may have included machine repair work and/or the use of above ground and/or underground storage tanks (ASTs/USTs).

During the late 1960s and early 1970's the northern and eastern portions of the property were developed for commercial purposes and over time several business occupied two buildings on the site including; a restaurant, a bar/lounge, a grocery store or convenience market, a bank, and a video store. USTs discovered on the northeast corner of the site indicate that fueling activities likely occurred at the site. In 2019 the buildings were demolished by TURA.

2. BENEFICIAL LAND AND WATER USE DETERMINATIONS

Land use.

The property is zoned for commercial use. The site is situated in a mixed commercial and residential use area of north-central Talent. Future land use at the site and within the LOF is anticipated to remain commercial and residential. The property is currently owned by TURA and used as temporary, transitional housing. The long-term plans of the property include development of permanent multi-use commercial and residential structures.

Groundwater use.

There does not appear to be current or likely future beneficial uses of groundwater in the area and within the LOF. Municipal water is provided by the Medford Water Commission to users on the site and within the surrounding area. A search of the Oregon Water Resources Department database was completed and identified two, locatable water wells within a quarter mile radius from the site. Based on the distance between these wells and the site (each approximately 0.2 miles) and on their hydraulically cross gradient and upgradient locations, it is unlikely that the residual contamination remaining in subsurface soil or groundwater at the site will

negatively impact groundwater at these wells (AEC, 2019).

Surface water use.

The nearest surface water to the site is Wagner Creek, approximately 300 feet to the south. Bear Creek is situated approximately 0.3-miles to the east. An irrigation canal is located approximately 0.7 miles to the southwest of the site. Groundwater in the vicinity of the site presumably flows east towards Bear Creek. Stormwater at the site and surrounding area enters nearby creeks and is managed by the City of Talent.

3. INVESTIGATION AND CLEANUP WORK

In 2016 and 2018, Phase I Environmental Site Assessments (ESAs) were performed for the subject property and the adjacent property to the west. The ESAs identified the potential for historical fuel underground storage tanks (USTs) to have been used on the eastern portion of the site (AEC, 2016). Fuel USTs were also found on the adjacent property to the west (AEC, 2018).

Between 2017 and 2019, demolition of the structures located at 102 South Pacific Highway (tax lot 2700) and 104 South Pacific Highway (tax lot 2800) occurred. The demolition included identification of asbestos-containing materials (ACM) from each of the buildings and a geophysical mapping survey.

The geophysical survey identified several magnetic anomalies across the site. Follow up test pits at the locations of the anomalies uncovered two, previously unknown USTs (600-gallon and 1,000-gallon) near the northeast corner of the site.

Prior to demolition, identified ACM from both buildings was abated and disposed of at Dry Creek Landfill in Eagle Point, Oregon. Removal of two oil-water separators, or potentially former restaurant grease traps, and approximately 8.5 tons of associated petroleum-contaminated soil (PCS) was also completed as part of the building demolition work on 102 South Pacific Highway (AEC, 2019).

Based on identified recognized environmental conditions on all three tax lots, during October 2018, ten push probe borings were completed across the site to determine if contamination was present in soil and groundwater. In general, contamination was not identified in any of the borings, except those completed adjacent to the two USTs near the northeast corner of the site. Groundwater was encountered in the borings between approximately 12 and 16 feet below the ground surface (bgs). Gasoline and diesel were detected in soil up to 3,030 milligrams per kilogram (mg/kg) and 3,490 mg/kg, respectively. The gasoline and diesel detections exceeded generic soil RBCs for direct contact. Benzene, naphthalene and 1,2,4-trimethylbenzene were also detected in soil up to 1.60 mg/kg, 8.29 mg/kg and 50.4 mg/kg respectively. Arsenic was detected up to 8.92 mg/kg in soil, exceeding the RBCs for direct contact. However, the arsenic detections are less than the regional background concentration of 12 mg/kg. Gasoline and diesel detections in groundwater ranged up to 5,840 micrograms per liter (ug/l) and 3,130 ug/l, respectively. The gasoline and diesel detections exceeded generic groundwater RBCs for drinking water ingestion and vapor intrusion into buildings.

The two USTs were decommissioned by removal during November 2018. During decommissioning, subsurface petroleum-like impacts were observed and reported to DEQ and the LUST incident number 15-18-1358 was assigned to the release and property. During UST removal, approximately 253 tons of PCS was excavated and taken to Dry Creek Landfill for disposal and fifteen soil confirmation samples, and one pit water sample were collected from the excavation. Three of the confirmation soil samples had detections of petroleum hydrocarbons, which were below applicable RBCs for the site. The pit water sample contained gasoline at 1,870 ug/l which exceeded the generic groundwater RBCs for drinking water ingestion and vapor intrusion into buildings. Free product was not observed during the decommissioning or excavation work.

A beneficial water use determination completed for the site reported the site and the surrounding properties are provided with municipal water and water supply wells are not present on the site or adjacent properties. Two domestic water wells were identified within a quarter mile radius of the site, with the nearest well located 0.20-miles northwest and crossgradient from the site. The second nearest well was located 0.21-miles southwest and upgradient of the site.

To delineate soil and groundwater impacts to the north and northeast of the former USTs, three additional borings were completed during August 2020. Gasoline, diesel and naphthalene were detected in soil up to 814 mg/kg, 4,570 mg/kg and 0.737 mg/kg, respectively. The detections exceeded the generic RBCs for urban residential soil ingestion, dermal contact and inhalation. Groundwater concentrations exceeding RBCs were detected up to, and included gasoline (6,380 ug/l), diesel (93,500 ug/l), naphthalene (528 ug/l), benzene (197 ug/l) and lead (46.0 ug/l). The groundwater detections exceeded the generic RBCs for drinking water ingestion, construction and excavation worker direct contact and vapor intrusion into buildings.

To address the vapor intrusion RBC exceedances, soil gas sampling was conducted near the former UST area during December 2021. Two shallow soil gas samples in the vicinity of the borings with the highest detections were collected and analyzed. No concentrations of site contaminants were reported in the soil gas samples.

An evaluation was also completed regarding elevated diesel concentrations in groundwater and whether the concentrations are suggestive of free product. According to AEC's 2022 report, the laboratory that completed the analysis reviewed the data and chromatographic traces. Based on review, the laboratory concluded the detections were representative of highly weathered diesel and "had silica gel cleanup been applied to the groundwater samples prior to analyses that TPH-d concentrations would have been significantly lower". Combined with the age of the USTs, lack of free product during UST decommissioning and low concentrations of PAHs relative to the diesel concentrations, indicate it is unlikely free diesel product is present in groundwater at the site (AEC 2022).

Nature and extent of contamination.

- Contaminants include gasoline, diesel, heavy oil their and associated constituents (i.e., benzene, ethylbenzene, naphthalene, xylenes, etc.).

- Affected media include soil and groundwater.
- Identified contamination ranges from approximately 8 feet bgs to the groundwater table between approximately 10-15 feet bgs.
- Impacted groundwater may extend downgradient onto the South Pacific Highway right of way.

4. RISK EVALUATION

Conceptual site model.

A conceptual site model (CSM) was created to identify potentially complete exposure pathways whereby site contamination could potentially pose an unacceptable risk to human and ecological receptors. The following CSM was generated based on zoning, current and anticipated future land use, water use, and nature and extent of contamination.

Sources of contamination are from leaking historical USTs formerly near the northeast corner of the site. Chemical results identified low to moderate detections of gasoline and diesel and their constituents in soil and moderate to high detections in groundwater. The highest concentrations were detected within and immediately surrounding the former UST area. Based on current and anticipated future site use pathways by which this contamination could reach human and/or ecological receptors include direct contact to construction and excavation workers, vapor migration to outdoor and/or indoor air, and leaching to groundwater, where it may be ingested or contacted directly in an open excavation, or where groundwater may emerge as surface water.

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 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	Applicable RBC?	Basis for selection/exclusion
SOIL			
Ingestion, dermal contact, and inhalation	Residential	No	See Notes 1 and 2.
	Urban residential	No	
	Occupational	No	
	Construction worker	Yes	
	Excavation worker	Yes	
Volatilization to outdoor air	Residential	No	See Note 1.
	Urban residential	Yes	
	Occupational	Yes	
Vapor intrusion into buildings	Residential	No	See Note 1.
	Urban residential	Yes	
	Occupational	Yes	

Pathway	Receptor	Applicable RBC?	Basis for selection/exclusion
Leaching to groundwater	Residential	No	See Note 3.
	Urban residential	No	
	Occupational	No	
GROUNDWATER			
Ingestion and inhalation from tap water	Residential	No	See Notes 3 and 4.
	Urban residential	No	
	Occupational	No	
Volatilization to outdoor air	Residential	No	See Note 1.
	Urban residential	Yes	
	Occupational	Yes	
Vapor intrusion into buildings	Residential	No	See Note 1.
	Urban residential	Yes	
	Occupational	Yes	
Groundwater in excavation	Construction and excavation worker	Yes	

Notes:

1. Current property use is temporary residential with anticipated future use of mixed commercial and urban residential.
2. Soil contamination is greater than 3 feet.
3. Groundwater is not used for drinking. This pathway is therefore not considered, in accordance with Section B.3.2.4 of DEQ's RBDM guidance.
4. City water is provided. Local groundwater is not currently used for drinking water and is not likely to be used for this purpose in the future.

Contaminant concentrations.

Soil. Gasoline, diesel and naphthalene were detected above RBCs for leaching to groundwater and for urban residential soil ingestion, direct contact and inhalation in residual soils near the former UST excavation on the site. These samples were collected between 7.5 and 9 feet bgs and due to the depth of contamination being greater than DEQ's residential exposure depth of 0 to 3 feet, there should not be an unacceptable risk for direct contact of site contaminants in soil to current or future urban residential users of the site. Arsenic was also detected up to 8.92 mg/kg in soil, greater than the RBC for residential direct contact. However, the detections were less than the regional background concentration of 12 mg/kg for arsenic. The exceedance of leaching to groundwater has been verified, as groundwater impacts in this area were identified.

Groundwater. Site contaminant concentrations in groundwater were only present and highest in sample locations adjacent to the former UST area. Gasoline was detected up to 6,380 ug/l, diesel up to 93,500 ug/l, naphthalene up to 528 ug/l, benzene up to 197 ug/l and lead up to 46.0 ug/l. The groundwater detections exceeded the generic RBCs for drinking water ingestion, construction and excavation worker direct contact and vapor intrusion into buildings. The nearest domestic water wells are approximately 0.2 miles from the site and are located crossgradient and upgradient of the site. Based on distance and direction from the site, there does not appear to be an unacceptable risk from ingestion of groundwater. Naphthalene exceeded the groundwater in

excavation RBC of 500 ug/l for construction and excavation workers. However, based on the slight exceedance, the depth to groundwater ranging between approximately 8 and 14 feet bgs (not likely encountered during general construction activities) and probable duration of exposure to contamination, it is unlikely an unacceptable risk exists to future construction and excavation workers via the groundwater entering an excavation pathway. Soil gas testing near the former USTs would provide the data required to evaluate risk for the vapor intrusion into buildings RBC exceedances. See below.

Soil Gas. Detections of site contaminants were not reported above laboratory detection limits in either soil gas sample. As such, there does not appear to be unacceptable risks for vapor intrusion into buildings.

Human health risk.

Based on reported findings, unacceptable risks to human health were not identified for the site.

Ecological risk.

The site is almost entirely paved and developed and the commercially developed, therefore there is no ecological habitat on the site. Also, there is no shallow soil contamination associated with the former USTs that could affect terrestrial receptors. Due to the nature of the remaining groundwater contamination, it is unlikely that contamination would extend 0.3-miles to Bear Creek at levels that could pose a threat to ecological receptors. Therefore, there does not appear to be ecological risks associated with residual contamination from the site.

5. RECOMMENDATION

Following an investigation of the contamination present on the site and based on sample results for soil, groundwater and soil gas, acceptable risk levels are not exceeded, and a No Further Action determination is recommended. The No Further Action determination will be recorded in DEQ's LUST database, Your DEQ Online (LUST No. 15-18-1359).

6. ADMINISTRATIVE RECORD

Phase I Environmental Site Assessment for 102 South Pacific Highway in Talent, Oregon, AEC (November 10, 2016).

Phase I Environmental Site Assessment for 104 South Pacific Highway in Talent, Oregon, AEC (January 17, 2018).

Phase II Environmental Site Assessment, UST Decommissioning, and Demolition Activities Report, AEC (October 30, 2019).

Work Plan for Supplemental Leaking Underground Storage Tank Investigation, AEC (August 10, 2020).

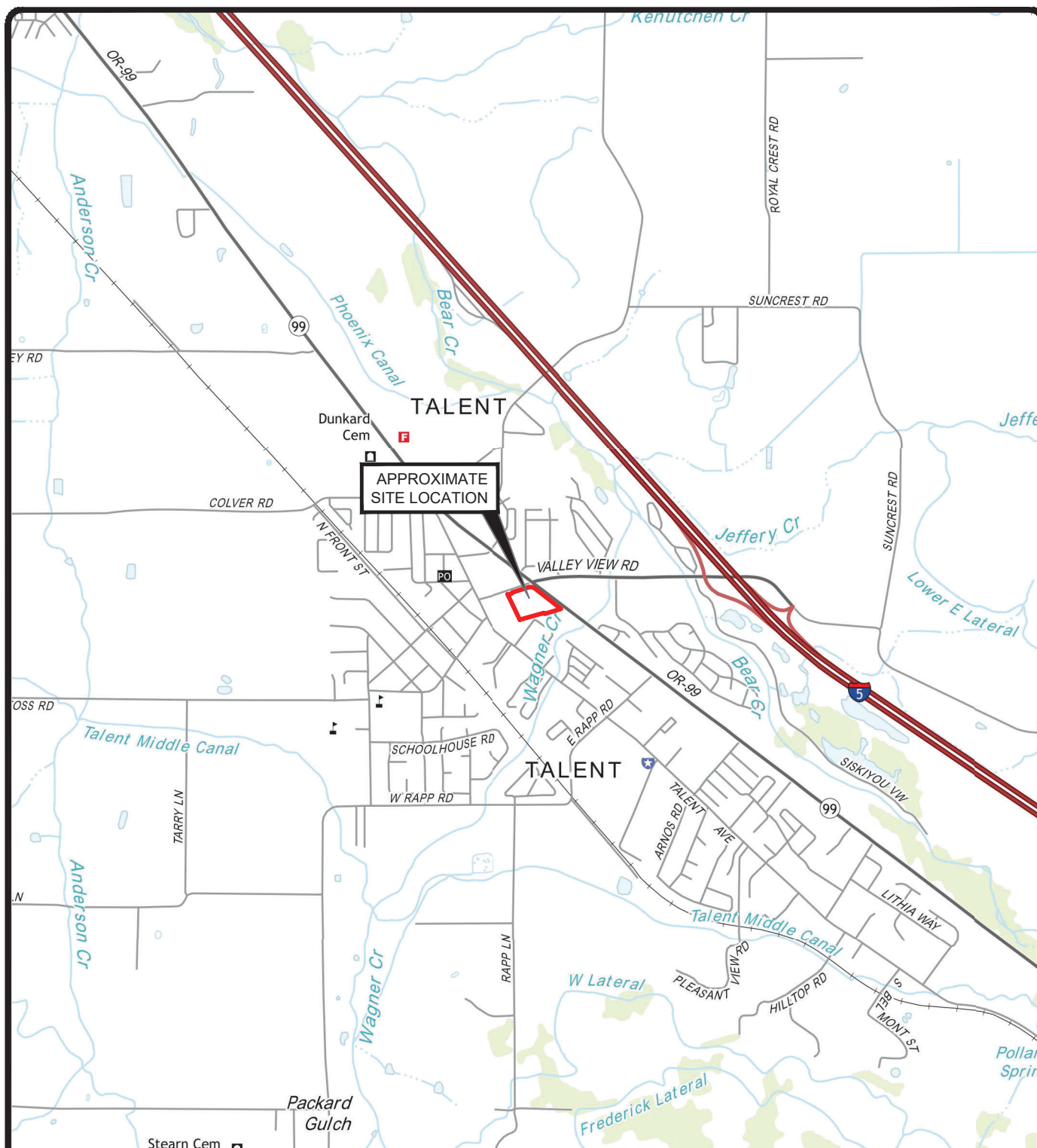
Supplemental Investigation Report, Leaking Underground Storage Tank, Talent Gateway Redevelopment Property, AEC (February 25, 2021).

Supplemental Soil Gas Investigation LUST Incident 15-18-1358 Talent Gateway Redevelopment Property, AEC (March 31, 2022).

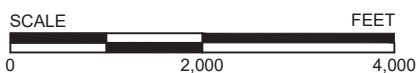
7. ATTACHMENTS

Figures:

1. Vicinity Map
2. Site Location Map



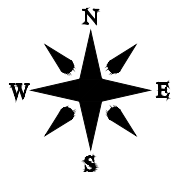
SOURCE: U.S.G.S. 7.5 MINUTE TOPOGRAPHIC QUADRANGLE
TALENT, OREGON AND MEDFORD, EAST, OREGON (2014)




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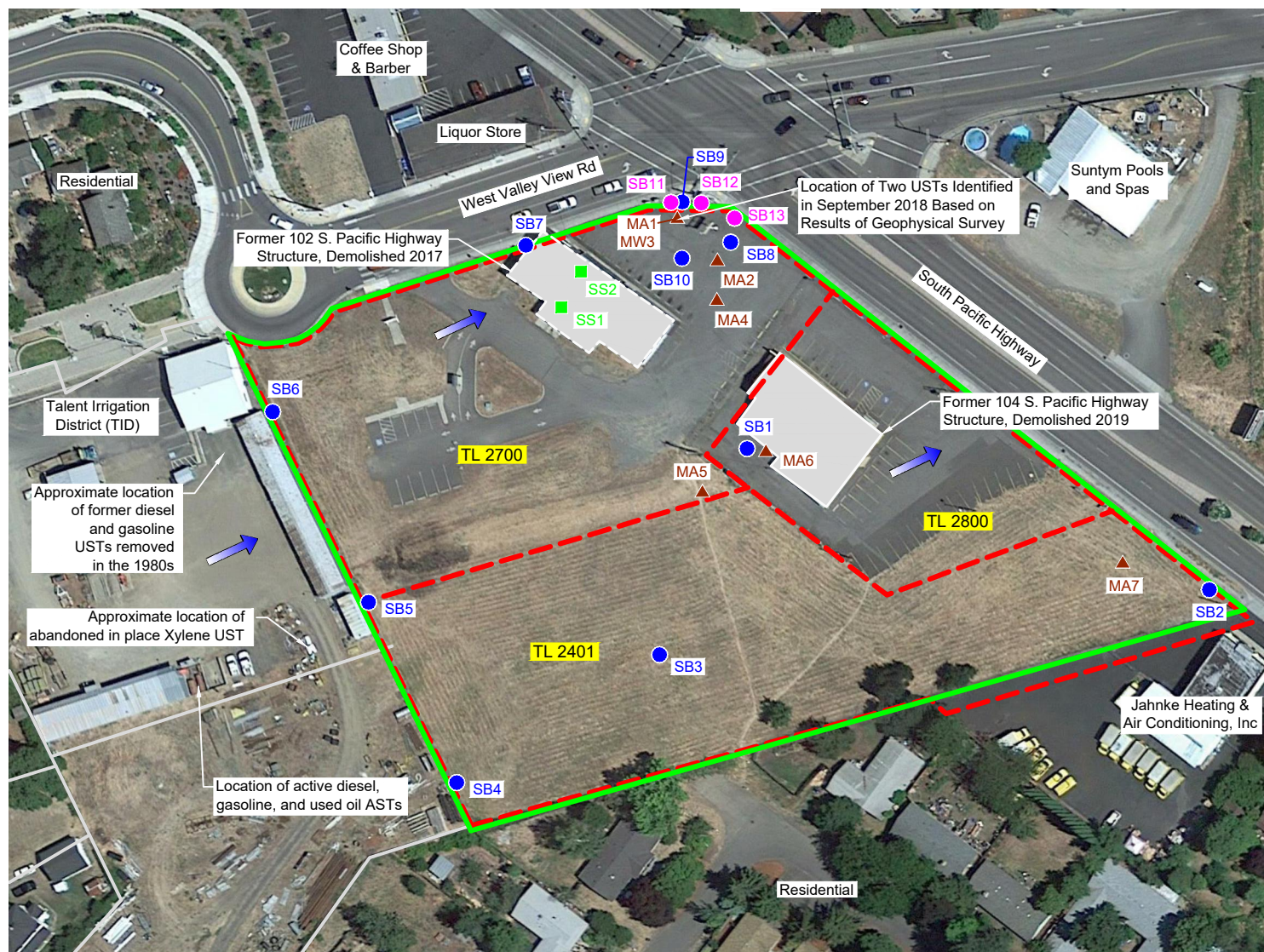
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Figure 1
Site Location Map
Phase II Investigation and UST Decommissioning
102 and 104 South Pacific Highway
Talent, Oregon

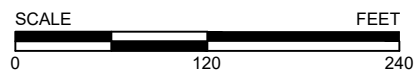


LEGEND

- Approximate Tax Lot Boundaries
- Approximate Boundary of Subsurface Mapping Survey
- Inferred Groundwater Flow Direction
- UST Underground Storage Tank
- AST Above Ground Storage Tank
- SB11 Soil Boring, August 2020
- SB1 Soil Boring, October 2018
- ▲ MA1 Magnetic Anomaly
- SS1 Soil Sample for Sumps



SOURCE: GOOGLE EARTH (2018)



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Figure 2
Site Map
Phase II Investigation and UST Decommissioning
102 and 104 South Pacific Highway
Talent, Oregon