Stantec

Memo

To:	Don Hanson, RG Oregon Department of Environmental Quality	From:	Bob McAlister, RG Stantec Consulting Services Inc. Portland, Oregon
Project/File:	185750631	Date:	July 25, 2025

Edgewood Shopping Center Well Decommissioning Memorandum

Mr. Hanson,

Stantec Consulting Services Inc. (Stantec) has prepared this memorandum to document the decommissioning of groundwater monitoring wells at the Edgewood Shopping Center (the "Site") located in Eugene, Oregon. These activities were conducted pursuant to the conditional No Further Action (NFA) determination issued by the Oregon Department of Environmental Quality (DEQ) on March 28, 2025 (**Attachment A**).

The Site's environmental background and investigation history are detailed in the DEQ's NFA determination letter. A Site location map and plan are included as **Figure 1** and **Figure 2**, respectively.

Field Activities

Stantec subcontracted BB&A Environmental, an Oregon-licensed drilling contractor, to complete the decommissioning of all groundwater monitoring wells under the supervision of a Stantec Oregon-registered geologist. The following monitoring wells were decommissioned on May 13–14, 2025:

- MW-1 through MW-4
- MW-5R
- MW-6
- MW-7

In addition, all remaining injection and extraction wells installed in 2011 for the remedial injection were decommissioned:

- E-1 through E-3
- I-4

Each well was decommissioned using over-drilling techniques with a 10.25-inch diameter hollow-stem auger to the total depth of the original borehole. Following over-drilling, each borehole was backfilled with a bentonite/neat cement slurry to approximately one (1) foot below ground surface (bgs). Surface completions consisted of concrete dyed black to match the existing asphalt surface placed from one (1) foot bgs to surrounding grade.

Reference: **Edgewood Shopping Center Well Decommissioning Report**

All decommissioning procedures were conducted in accordance with Oregon Water Resources Department (OWRD) well abandonment standards.

Waste Disposal

Well decommissioning activities generated ten (10) 55-gallon open-top steel drums of solid waste, primarily composed of soil and residual well construction materials (e.g., sand and bentonite).

A representative composite waste characterization sample was collected by sub-sampling each of the 10 waste drums. This composite sample was submitted to Apex Laboratories in Tigard, Oregon for analysis of halogenated volatile organic compounds (HVOCs) in accordance with United States Environmental Protection Agency Method 8260D. Laboratory results identified the presence of tetrachloroethene (PCE) at a concentration of 1.21 milligrams per kilogram (mg/kg).

Analytical data was submitted to DEQ, and a Contained-In Determination Addendum was issued on June 11, 2025 (**Attachment B**) authorizing disposal of the waste at the Short Mountain Landfill, a Subtitle D facility operated by Lane County and located at 84777 Dillard Access Road in Eugene, Oregon. Waste disposal documentation and manifests are included in **Attachment B**.

Closing

All Site groundwater monitoring wells were decommissioned by over-drilling in accordance with Oregon Water Resources Department standards and all waste generated was properly disposed in accordance with the DEQ-issued Contained-In Determination Addendum. Stantec is submitting this Well Decommissioning Memorandum to the DEQ pursuant to the conditions of the NFA on behalf of the Site property owner, Mr. Robert Breeden.

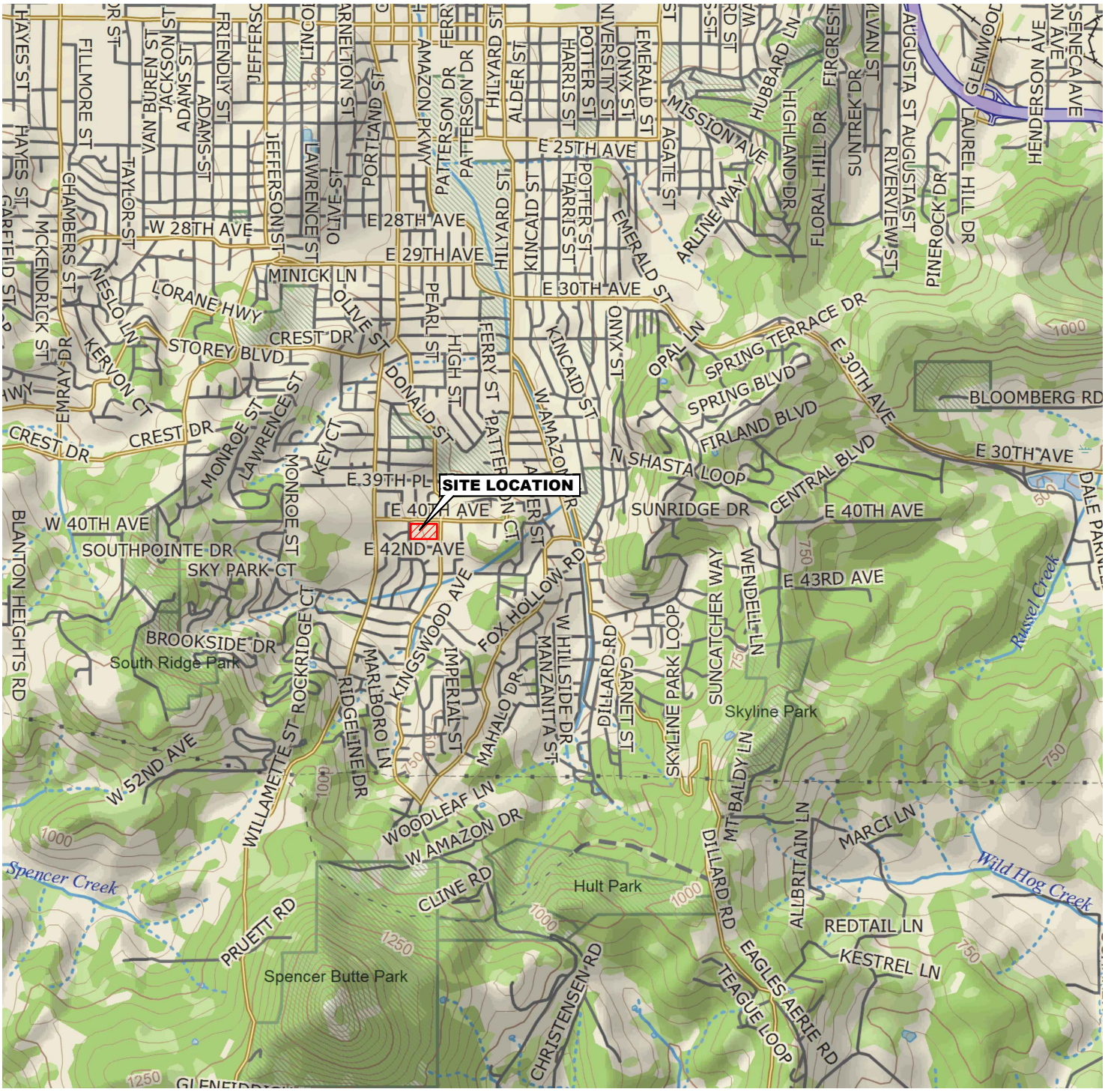
Thank you,

Stantec Consulting Services Inc.

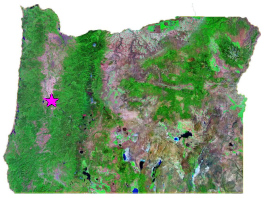
Bob McAlister RG
Associate Geologist
Phone: (503) 220-5458
Mobile: (714) 686-4435
bob.mcalister@stantec.com

stantec.com

Attachment: Figure 1 – Site Location Map
Figure 2 – Site Plan
Attachment A – No Further Action Determination
Attachment B –Contained In Determination and Waste Disposal Documentation



North



OREGON

1/2 0 1

SCALE (MILES)

1000 0 1000 2000 3000 4000 5000

SCALE (FEET)

REFERENCE: USGS 7.5 MINUTE QUADRANGLE, EUGENE EAST, OREGON

Stantec

9400 SW BARNES ROAD, SUITE 200
PORTLAND, OREGON
PHONE (503) 297-1631/297-5429 (FAX)

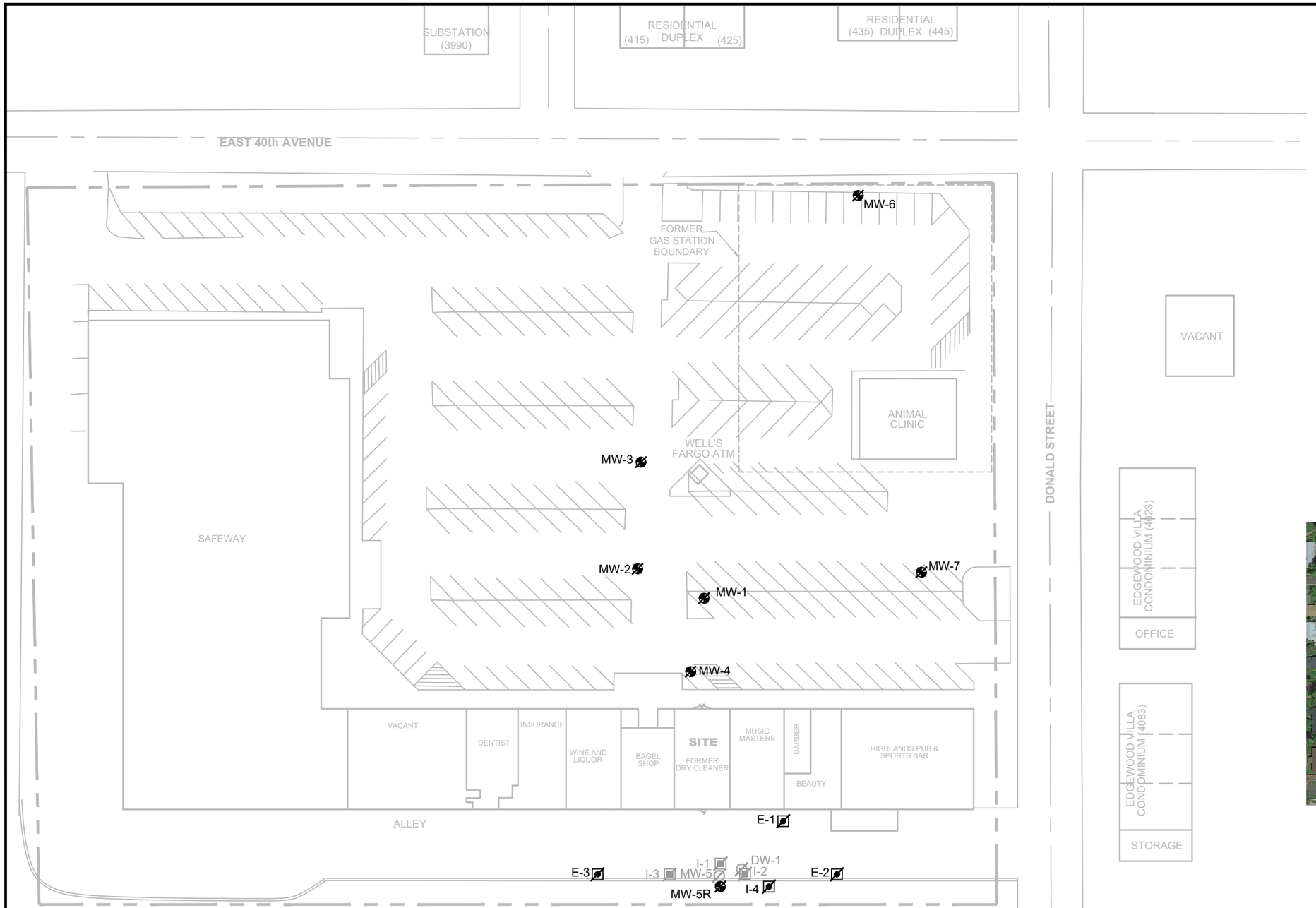
FOR:
ROBERT BREEDEN
EDGEWOOD SHOPPING CENTER
350-390 E 40th AVENUE
EUGENE, OREGON

SITE LOCATION MAP

FIGURE: **1**

JOB NUMBER:	DRAWN BY:	CHECKED BY:	APPROVED BY:	DATE:
185750631	MDR	RM	PF	JAN 2019

FILEPATH:V:\1857\active\Secor\CADD_00 OTHER OFFICES\PORTLAND\BREEDEN BROS\FIG-1_SITE LOC-OREGON.dwg | Layout Tab: Layout1 | Drafter: MiRamirez | Jan 18, 2019 at 14:40



LEGEND:

- SITE BOUNDARY LINE
- MW-5 ∅ WELLS ABANDONED AUGUST 2020
- MW- MONITORING WELL ABANDONED MAY 2025
- I-3 CLASS V WELL ABANDONED AUGUST 2020
- I-4 CLASS V WELL ABANDONED AUGUST 2025

N

0 60 120

APPROXIMATE SCALE IN FEET

Stantec
601 SW SECOND AVENUE
PORTLAND, OREGON
PHONE (503) 297-1631/297-5429 (FAX)

FOR:
ROBERT BREEDEN
EDGEWOOD SHOPPING CENTER
350-390 E 40th AVENUE
EUGENE, OREGON

SITE PLAN

FIGURE: **2**

JOB NUMBER:	DRAWN BY:	CHECKED BY:	APPROVED BY:	DATE:
185750631	MDR/JBL	BM	P. VAUGHAN	JULY 2025

FILEPATH:V:\1858\miscellaneous\secor\CADD\00_OTHER OFFICES\Portland, OR\BREEDEN BROS\2025\EDGEWOOD.dwg | Layout Tab: FIG-3 GW | Drafter: JLieberman | Jul 23, 2025 at 10:35

Oregon
Tina Kotek, Governor

Department of Environmental Quality
Western Region Eugene Office
165 East 7th Avenue, Suite 100
Eugene, OR 97401
(541) 686-7838
FAX (541) 686-7551
TTY 711

March 28, 2025

Robert L. Breeden
Edgewood Shopping Center
366 E. 40th Avenue, Suite 250
Eugene, OR 97405

RE: Conditional No Further Action Determination
for Edgewood Cleaners, McCool Property
ECSI 4586 and ECSI 1209

Dear Mr. Breeden:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information for the Edgewood Cleaners site, including the closure report entitled Independent Cleanup Pathway Final Report dated April 18, 2023, and subsequent data and deliverables which were submitted to DEQ by Stantec Consulting Services, on your behalf. The Edgewood Cleaners address is 370 E. 40th Street, Eugene, Oregon in Lane County Tax Map 18031811, Tax Lots 100 and 101.

DEQ has determined that remedial action to address environmental contamination at the Edgewood Cleaners Site is complete, and no further action is required, with conditions. 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, and as more fully described in DEQ's Staff Memo dated July 31, 2023:

- In 1968, the Site was developed with a strip mall shopping center and Safeway grocery store. A dry cleaner operated in one ground floor suite on the east/west wing of the strip mall shopping center (Figure 2) as Siegmund's Cleaners and possibly other business names.
- In 1991, chlorinated solvents including tetrachloroethylene (PCE), trichloroethylene (TCE), and associated underlying constituents, were detected in water samples collected during the decommissioning of underground storage tanks associated with the McCool Property, Leaking Underground Storage Tank (LUST) site #20-91-4095. In 1992, due to the detections of solvents at the McCool LUST site, the McCool Property was entered into the Environmental Cleanup Site Information (ECSI) database as ECSI #1209. In 2006 DEQ opened ECSI site #4586 due to dry cleaner solvent contamination found at Siegmund's Cleaners located at the shopping center. The McCool Property LUST file was closed by DEQ on July 24, 2024.
- Dry cleaning solvents including PCE and TCE were released or spilled at the former dry cleaner site. It appears the primary release area was behind (south) of the former cleaners location, in the rear shopping center alleyway on the south side of the site.
- Soil, groundwater, soil vapor and air have been affected by the contamination.
- Shallow groundwater remediation in the source area was attempted in 1994 but was unsuccessful. A second groundwater treatment was done in 2011, using chemical oxidation, which resulted in no significant reduction of contaminants. A soil removal was conducted in 2020 that involved excavating about 800 cubic yards of source area contaminated soils and extracting and treating about 7,000

gallons of contaminated groundwater from the excavation. The source soil cleanup should help reduce further contamination of the groundwater at the site in the future.

- Soil and groundwater contamination remains beneath the site. Soil contamination is limited to the area around the former source area that was not excavated and may extend beneath the shopping center building. Groundwater contamination is widespread beneath the majority of the shopping center and has migrated north and east beneath the E. 40th Avenue and Donald Street rights-of-way.
- The property is zoned commercial but is surrounded by single and multi-family residential. It is likely that the site will remain commercial, however housing is currently an allowable permitted use at the property. There are no sensitive environments at the site. Stormwater runoff is routed through storm drains into the city storm water system, which discharges to Tugman Creek north of the site.
- Complete human health exposure pathways on and off-site include construction and excavation worker direct exposure to groundwater in excavations, and vapor intrusion into buildings.
- Groundwater contaminant levels in shallow groundwater beneath parts of the shopping center property exceed DEQ's Risk-Based Concentrations (RBCs) for water in an excavation. Air sampling from the building indicated that vapor intrusion is not currently a risk to workers and patrons at the shopping center. However, PCE and TCE are present in groundwater beneath the site at levels well above DEQ's RBCs for vapor intrusion into commercial buildings. Thus, new buildings constructed at the site could be at risk from vapor intrusion.
- A 30 day public comment period regarding this No Further Action determination was initiated on September 1, 2023. At the request of the city of Eugene, the comment period was extended until October 13, 2023. Direct mailings were sent to neighborhood residents in the immediate vicinity of the site, including properties where sampling had been conducted as part of the project. DEQ received written comments from the city of Eugene requesting more information about contamination remaining beneath E. 40th Avenue and Donald Streets, and possible impacts to stormwater and downstream Tugman and Amazon Creeks. To address the city's questions, groundwater and storm water samples were collected. Storm water sampling addressed the city's concern about contaminants entering the stormwater system and getting into Tugman and Amazon Creeks. Groundwater sampling helped delineate shallow groundwater adjacent to the E. 40th Avenue right-of-way.
- Institutional controls in the form of an Easement and Equitable Servitudes (EES) are necessary to prevent unacceptable risk to construction and excavation workers that could encounter contaminated groundwater beneath the site. Land use restrictions are needed, which include:
    - Ensure that if new buildings are constructed at the shopping center property, that there will not be an unacceptable vapor intrusion risk into those buildings.
    - A Contaminated Media Management Plan (CMMP) was approved by the DEQ that describes how contaminated media should be handled both from the shopping center property, and beneath the E. 40th Avenue and Donald Street rights-of-way and provide instructions for reducing exposure and risks to construction workers if exposed to contaminated groundwater on site. The EES for the Edgewood Shopping Center was recorded at Lane County on November 13, 2024.

Based on the available information, soil, groundwater and soil vapor conditions at the Edgewood Cleaners site and vicinity are currently protective of public health and the environment in accordance with Oregon Administrative Rules Chapter 340, Division 122, Sections 010 to 0140; and ORS 465.200 through 465.455. 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 its Environmental Cleanup Site Information System (ECSI) databases for ECSI 4586 and ECSI 1209 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 the approved CMMP as well as local, state and federal regulations. Monitoring wells should be maintained or decommissioned in accordance with Oregon Water Resources Department regulations.

A copy of the Stantec's Independent Cleanup Pathway Final Report and DEQ's Staff Memo supporting this No Further Action decision, and other project documents, can be viewed at https://ordeq.org/ECSI4586. DEQ recommends keeping a copy of all the documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Don Hanson at 503-329-7391, or via email at don.hanson@deq.oregon.gov.

Sincerely,

Brad Shultz

Brad Shultz, Manager
Western Region Cleanup Section

Attachment(s): Site Map
EES

ec: Pat Vaughn, Stantec, patrick.vaughan@stantec.com, with attachments
Bob McAlister, Stantec, Bob.McAlister@stantec.com, with attachments
ECSI File #4586, ECSI 1209, with attachments

CONDITIONAL NO FURTHER ACTION
EDGEWOOD CLEANERS – ECSI 4586
MC COOL PROPERTY – ECSI 1209
Note: McCool Property LUST was NFAd 7/24/2024

Refer to Contaminated Media Management Plan for site restriction areas

Lane County Clerk
Lane County Deeds & Records
2024-033239
11/13/2024 03:54:24 PM
RPR-ESMT Cnt=1 Stn=45 TMS 33pages
$165.00 $11.00 $10.00 $61.00 $247.00

CTS424-0591NRJ
AFTER RECORDING RETURN TO:
CASCADE TITLE COMPANY
675 OAK ST., SUITE 100
EUGENE, OR 97401

Space above this line for Recorder's use.

After recording, return to:

Grantee
Oregon DEQ
165 E. 7th Avenue, Suite 100
Eugene, OR 97401
Attention: Donald Hanson

Grantor
Edgewood Shopping Center, LLC, an Oregon limited liability company
366 E. 40th Avenue, Ste. 250
Eugene, OR 97405

EASEMENT AND EQUITABLE SERVITUDES

This grant of Easement and acceptance of Equitable Servitudes ("EES") is made on October 11th, 2024 between Edgewood Shopping Center, LLC, an Oregon limited liability company ("***Grantor***") and the State of Oregon, acting by and through the Oregon Department of Environmental Quality ("DEQ" or "Grantee").

RECITALS

A. Grantors are the owner of certain real property located at 370 E. 40th Avenue, Eugene , Oregon in Lane County Tax Map 18031811, Tax Lots 100 and 101 (the "***Property***") the location of which is more particularly described in Exhibit A to this EES. The Property is referenced under the name Edgewood Cleaners, ECSI #4586 in the files of DEQ's Environmental Cleanup Program at Western Region office located at 165 E. 7th Avenue, Suite 100, Eugene, Oregon, and telephone 541-686-7838. Interested parties may contact the Western Region office to review a detailed description of the risks from contamination remaining at the Property and described in Independent Cleanup Pathway Report and other documents.

B. On July 31, 2021 the Director of the Oregon Department of Environmental Quality or delegate selected the remedial action for the Property in its Staff Memo. Elevated levels of hazardous substances remaining at the Property could exceed acceptable risk levels for residential use of the Property, or if new buildings were constructed on the site. The remedial action selected requires, among other things: Institutional controls to restrict land uses and implementation of a Contaminated Media Management Plan (CMMP).

C. On February 24, 2009 Grantors entered into a Voluntary Cleanup Program Letter Agreement with DEQ, under which Grantors agreed to implement the selected remedial action, including the required institutional controls.

CT5424-0591NRJ
AFTER RECORDING RETURN TO:
CASCADE TITLE COMPANY
675 OAK ST., SUITE 100
EUGENE, OR 97401

Space above this line for Recorder's use.

After recording, return to:

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Attention: Donald Hanson

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B. On July 31, 2021 the Director of the Oregon Department of Environmental Quality or delegate selected the remedial action for the Property in its Staff Memo. Elevated levels of hazardous substances remaining at the Property could exceed acceptable risk levels for residential use of the Property, or if new buildings were constructed on the site. The remedial action selected requires, among other things: Institutional controls to restrict land uses and implementation of a Contaminated Media Management Plan (CMMP).

C. On February 24, 2009 Grantors entered into a Voluntary Cleanup Program Letter Agreement with DEQ, under which Grantors agreed to implement the selected remedial action, including the required institutional controls.

D. This EES is intended to further the implementation of the selected remedial action and protect human health and the environment.

E. Nothing in this Easement and Equitable Servitude constitutes an admission by Grantors of any liability for the contamination described in the Easement and Equitable Servitude.

1. DEFINITIONS

1.1 "Acceptable risk level" has the meaning set forth in Oregon Revised Statute (ORS) 465.315 and Oregon Administrative Rule (OAR) 340-122-0115.

1.2 "DEQ" means the Oregon Department of Environmental Quality, and its employees, agents, and authorized representatives. "DEQ" also means any successor or assign of DEQ under the laws of Oregon, including but not limited to any entity or instrumentality of the State of Oregon authorized to perform any of the functions or to exercise any of the powers currently performed or exercised by DEQ.

1.3 "Ecological receptor" has the meaning set forth in OAR 340-122-0115.

1.4 "Hazardous substance" has the meaning set forth in ORS 465.200

1.5 "Owner" means any person or entity, including Grantors, who at any time owns, occupies, or acquires any right, title, or interest in or to any portion of the Property or a vendee's interest of record to any portion of the Property, including any successor, heir, assign or holder of title or a vendee's interest of record to any portion of the Property, but excluding any entity or person who holds such interest solely for the security for the payment of an obligation and does not possess or control use of the Property.

1.6 "Remedial Action" has the meaning set forth in ORS 465.200 and OAR 340-122-0115.

2. GENERAL DECLARATION

2.1 Grantors, in consideration of Grantee's issuance of a No Further Action letter with conditions, grants to DEQ an Easement for access and accepts the Equitable Servitudes described in this instrument and, in so doing, declares that the Property is now subject to and must in future be conveyed, transferred, leased, encumbered, occupied, built upon, or otherwise used or improved, in whole or in part, subject to this EES.

2.2 Each condition and restriction set forth in this EES touches and concerns the Property and the equitable servitudes granted in Section 3 and easement granted in Section 4 below, runs with the land for all purposes, is binding upon all current and future owners of the Property as set forth in this EES, and inures to the benefit of the State of Oregon. Grantors further conveys to DEQ the perpetual right to enforce the conditions and restrictions set forth in this EES.

3. EQUITABLE SERVITUDES
(REQUIRED ACTIONS AND RESTRICTIONS ON USE)

3.1 **Land Use Restrictions.** The following operations and uses are prohibited on the Property:

3.1.1 Residential use, without further investigation for vapor intrusion, and/or DEQ approval.

3.1.2 New building construction for human occupancy without additional vapor intrusion investigation or vapor mitigation and/or DEQ approval.

3.2 **Contaminated Media Management Plan (CMMP).**

The June 20, 2024 CMMP, Exhibit B to this EES, shall be followed when excavation work is done within the area of residual contamination impacts. The CMMP:

a. Provides guidance on risk reduction and health and safety protocols for on-site and off-site trench workers who might encounter contaminated groundwater. A copy of the CMMP has been provided to the City of Eugene.
b. Describes how contaminated soil and groundwater be handled, sampled and managed if removed from the ground in contaminated areas, both on and off-site. This shall include the hazardous waste determination and processes for soil and water generated, and options for proper handling and disposal.

3.3 **Use of the Property**. Owner may not occupy or allow other parties to occupy the Property unless the controls listed in this Section 3 are maintained.

4. EASEMENT
(RIGHT OF ENTRY)

During reasonable hours and subject to reasonable security requirements, DEQ may enter upon and inspect any portion of the Property to determine whether the requirements of this EES have been or are being complied with. Except when necessary to address an imminent threat to human health or the environment, DEQ will use its best efforts to notify the Owner 72 hours before DEQ entry to the Property. DEQ may enter upon the Property at any time to abate, mitigate, or cure at the expense of the Owner the violation of any condition or restriction contained in this EES, provided DEQ first gives written notice of the violation to Owner describing what is necessary to correct the violation and Owner fails to cure the violation within the time specified in such notice. Any such entry by DEQ to evaluate compliance or to abate, mitigate, or cure a violation may not be deemed a trespass.

5. RELEASE OF RESTRICTIONS

5.1. Owner may request release of any or all of the conditions or restrictions contained in this EES by submitting such request to the DEQ in writing with evidence that the conditions or restrictions are no longer necessary to protect human health and the environment. The

decision to release any or all of the conditions or restrictions in this EES will be within the sole discretion of DEQ.

5.2. Upon a determination pursuant to Subsection 5.1, DEQ will, as appropriate, execute and deliver to Owner a release of specific conditions or restrictions, or a release of this EES in its entirety.

6. GENERAL PROVISIONS

6.1. **Notice of Transfer/Change of Use.** Owner must notify DEQ within 10 days after the effective date of any conveyance, grant, gift, or other transfer, in whole or in part, of Owner's interest in or occupancy of the Property. Such notice must include the full name and address of the Party to whom Owner has transferred an interest or right of occupancy. In addition, Owner must notify DEQ a minimum of 10 days before the effective date of any change in use of the Property that might expose human or ecological receptors to hazardous substances. Such notice must include complete details of any planned development activities or change in use. Notwithstanding the foregoing, Owner may not commence any development inconsistent with the conditions or restrictions in Section 3 without prior written approval from DEQ as provided in Subsection 3 of this EES or removal of the condition or restriction as provided in Subsection 5.1. This subsection does not apply to the grant or conveyance of a security interest in the Property.

6.2. **Zoning Changes.** Owner must notify DEQ no less than 30 days before Owner's petitioning for or filing of any document initiating a rezoning of the Property that would change the base zone of the Property under the city of Eugene zoning code or any successor code. As of the date of this EES, the base zone of the Property is C-2, Community Commercial.

6.3. **Cost Recovery.** Owner will pay DEQ's costs for review and oversight of implementation of and compliance with the provisions in this EES, including but not limited to periodic review and tracking of actions required by this EES. This EES constitutes the binding agreement by the Owner to reimburse DEQ for all such eligible review and oversight costs. DEQ will establish a cost recovery account for tracking and invoicing DEQ project costs. DEQ will provide the Owner with a monthly statement and direct labor summary. DEQ costs will include direct and indirect costs. Direct costs include site-specific expenses and legal costs. Indirect costs are those general management and support costs of the State of Oregon and DEQ allocable to DEQ oversight of this EES and not charged as direct site-specific costs. Indirect charges are based on actual costs and are applied as a percentage of direct personal services costs.

6.4. **Inspection and Reporting**. Owner will immediately notify DEQ of any condition or occurrence at the Property that does not conform with provisions of this EES.

6.5. **Reference in Deed**. A reference to this EES, including its location in the public records, must be recited in any deed conveying the Property or any portion of the Property. Each condition and restriction contained in this EES runs with the land so burdened until such time as the condition or restriction is removed by written certification from DEQ, recorded in the deed records of the County in which the Property is located, certifying that the condition or restriction is no longer required to protect human health or the environment.

6.6. **Effect of Recording**. Upon the recording of this EES, all future Owners are conclusively deemed to have consented and agreed to every condition and restriction contained in this EES, whether or not any reference to this EES is contained in an instrument by which such person or entity occupies or acquires an interest in the Property.

6.7. **Enforcement and Remedies**. Upon any violation of any condition or restriction contained in this EES, the State of Oregon, in addition to the remedies described in Section 4, may seek available legal or equitable remedies to enforce this EES, including civil penalties as set forth in ORS 465.900.

6.8. IN WITNESS WHEREOF Grantors and Grantee have executed this Easement and Equitable Servitude as of the date and year first set forth above.

BY SIGNATURE BELOW, THE STATE OF OREGON APPROVES AND ACCEPTS THIS CONVEYANCE PURSUANT TO ORS 93.808.

GRANTOR: Edgewood Shopping Center, LLC an Oregon limited liability company

By: Robert L. Breeden Date: 11-13-2024
Robert L. Breeden – Co-Managing Member

By: Donald J. Breeden Date: Nov. 13, 2024
Donald J. Breeden – Co-Managing Member

STATE OF OREGON)
) ss.
County of Lane)

The foregoing instrument is acknowledged before me this 13 day of November, 2024, by Robert L. Breeden and Donald J. Breeden of Co-Managing Members of Edgewood Shopping Center, LLC, on its behalf.

OFFICIAL STAMP
NADJA ROSE JUDISH
NOTARY PUBLIC-OREGON
COMMISSION NO. 1025995
MY COMMISSION EXPIRES JULY 13, 2026

NOTARY PUBLIC FOR OREGON
My commission expires: 7.13.2026

GRANTEE: State of Oregon, Department of Environmental Quality

By: Date: 10-11-24
Brad Shultz, Cleanup and Emergency Response Manager, Western Region

STATE OF OREGON)
) ss.
County of Deschutes)

The foregoing instrument is acknowledged before me this 11th day of October, 2024, by Brad Shultz, WR cleanup manager of Oregon Department of Environmental Quality, on its behalf.

OFFICIAL SEAL
MACKENZIE IAN P LANNIGAN
NOTARY PUBLIC - OREGON
COMMISSION NO. 1038304
MY COMMISSION EXPIRES JULY 02, 2027

NOTARY PUBLIC FOR OREGON
My commission expires: July 02, 2027

EXHIBIT A

Legal Description of the Property

Schaudt, Stemm & Wild, Inc.
CONSULTING ENGINEERS, SURVEYORS AND PLANNERS
388 High Street Eugene, Oregon 97401
503/485-8383 FAX 503/485-3582

June 1, 1992 Job No. 92-3951-35

DESCRIPTION FOR EDGEWOOD SHOPPING CENTER
Combined Parcels - 40th & Donald

Beginning at the northeast corner of Lot 1, Block 3, Edgewood Estates, as platted and recorded in Book 22, Page 9, Lane County Oregon Plat Records, and run thence along the east line of said Block 3, South, 380.00 feet to the southeast corner of Lot 6 said Block 3; thence along the north line of Block 3 said plat of Edgewood Estates and the north line of Block 3, Edgewood Estates First Addition, as platted and recorded in Book 23, Page 4, Lane County Oregon Plat Records, South 88°52' East, 518.28 feet to the west line of Donald Street as dedicated and established by said last mentioned plat; thence along the west line of said Donald Street North, 380.00 feet to the south line of 40th Avenue East; thence westerly along the south line of said 40th Avenue East, North 88°52' West, 518.28 feet to the Point of Beginning, in Eugene, Lane County, Oregon.

REGISTERED
PROFESSIONAL
LAND SURVEYOR

OREGON
JULY 9, 1965
DONN E. STEMM
715

EXHIBIT B

Contaminated Media Management Plan

Sign-off Sheet

Stantec

Contaminated Media Management Plan

Edgewood Shopping Center
350-390 E. 40th Avenue
Eugene, Oregon 97405
DEQ ECSI # 4586

June 20, 2024

Prepared for:

Mr. Robert Breeden
366 E. 40th Avenue
Eugene, Oregon 97405

Prepared by:

Stantec Consulting Services Inc.
601 SW 2nd Avenue, Suite 1400
Portland, Oregon 97214-3128

Sign-off Sheet

This document entitled Contaminated Media Management Plan was prepared by Stantec Consulting Services Inc. ("Stantec") for the account of Mr. Robert Breeden (the "Client

The conclusions in this report are Stantec's professional opinion, as of the time of the report, and concerning the scope described in the report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not consider any subsequent changes. The report relates solely to the specific project for which Stantec was retained and the stated purpose for which the Report was prepared. The report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

Stantec has assumed all information received from Client and third parties in the preparation of the Report to be correct. While Stantec has exercised a customary level of judgment or due diligence in the use of such information, Stantec assumes no responsibility for the consequences of any error or omission contained therein.

This Report is intended solely for use by the Client in accordance with Stantec's contract with the Client. While the report may be provided by the Client to applicable authorities having jurisdiction and to other third parties in connection with the project, Stantec disclaims any legal duty based upon warranty, reliance or any other theory to any third party, and will not be liable to such third party for any damages or losses of any kind that may result.

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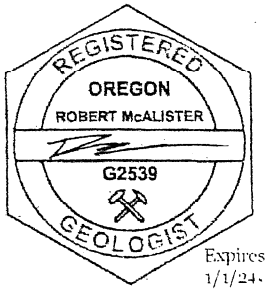

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1.0 INTRODUCTION

This Contaminated Media Management Plan (CMMP) has been prepared by Stantec Consulting Services Inc. (Stantec) on behalf of Mr. Robert Breeden for the Edgewood Shopping Center located at 350-390 E. 40th Avenue in Eugene, Oregon (hereafter referred to as "Property").

1.1 OBJECTIVES

The purpose of this CMMP is to provide specific information and guidance regarding the control and management of Site-related contaminated environmental media (soil and groundwater) that may be encountered during on- and off-Site excavation, earthwork and dewatering. This document includes:

- A description of the type and magnitude of hazardous substances detected in soil and groundwater samples collected at the Property.
- Procedures for the management (i.e., storage and disposal) of soil that may contain Site-related petroleum or hazardous substances at concentrations resulting in classification of the soil as a solid or hazardous waste during on- or off-Site excavation and/or, earthwork.
- Procedures for the management of groundwater that may contain petroleum or hazardous substances at concentrations that would limit its discharge to the City of Eugene stormwater management system.
- Measures to control access to contaminated media.
- Measures to control the off-site migration of contaminated soil via erosion and/or track-off; and
- Procedures for minimizing worker exposure to hazardous substances present in soil during Property redevelopment.

1.2 PROPERTY LOCATION AND DESCRIPTION

The Site is in a residential and commercial area of Eugene, Lane County, Oregon and consists of approximately 4.52 acres developed with an 'L' shaped, partial two-story shopping center building located along the western and southern Site boundaries, and an additional single-story square commercial building with a single tenant in the northeastern quadrant of the Site. The Site includes two environmental management areas where residual contaminants in soil and groundwater may be encountered (see Section 2.0). A Site Location Map is provided as **Figure 1**, and a Site Plan including designated Environmental Management Areas is attached as **Figure 2**.

1.3 SITE HISTORY

Historical documents indicate that the Property was developed for commercial use starting in 1968. Prior to development, the Site was undeveloped bare land. The present-day Site buildings have been occupied by a variety of tenants including but not limited to a Safeway grocery store, a dry cleaner, office spaces, flower shop and sports bar.

The northeastern portion of the Site was formerly occupied by a retail gasoline service station and car wash listed as the McCool Property located at 4010 Donald Street and is identified as an Oregon Department of Environmental Quality (DEQ) Leaking Underground Storage Tank (LUST) and

Environmental Cleanup Site Identification (ECSI) facility. Halogenated and petroleum volatile organic compounds (HVOCs) were detected in the groundwater at the McCool Property.

1.4 PREVIOUS ENVIRONMENTAL INVESTIGATIONS

Multiple soil, soil vapor, groundwater and indoor air investigations have been performed at the Site by Stantec and others since the presence of dry-cleaning chemicals (i.e., tetrachloroethene [PCE] and trichloroethene [TCE]) in groundwater was first identified circa 1990. The results of soil sampling identified a source area in a portion of the alleyway and landscaped area directly south of the former drycleaner. An interim removal action (IRA) was implemented in August 2020 following DEQ approval. Approximately 850 cubic yards of soil extending to a depth of approximately 12-feet bgs was removed in the source area surrounding the former location of MW-5. Confirmation sampling indicated that residual soil did not contain PCE, TCE or 1,2-DCE above any applicable DEQ RBCs. However, it is possible that residual soil impacts remain in areas extending from the limits of the excavation to the building foundations and possibly laterally.

Groundwater monitoring events have been conducted at the Property periodically since approximately 2007. As a result, the groundwater gradient beneath the Property has been calculated to flow in a north-northeasterly direction for all events conducted at the Property. The most current results indicate that dry-cleaning chemicals are present in all on-Site wells and impacts to groundwater likely extend to E. 40th Avenue and Donald Street.

2.0 NATURE AND EXTENT OF CONTAMINATION

2.1 SOIL

An interim removal action (IRA) was implemented in August 2020 following DEQ approval. Approximately 850 cubic yards of soil extending to a depth of approximately 12-feet bgs was removed in the source area surrounding the former location of MW-5. Confirmation sampling indicated that residual soil did not contain PCE, TCE or 1,2-DCE above any applicable DEQ RBCs. However, it is possible that residual soil impacts remain in areas extending from the limits of the excavation to the building foundations and possibly laterally (see Figure 2).

2.2 GROUNDWATER

Groundwater has been impacted by chemicals released from the former dry cleaner (i.e., PCE) and is considered as a F002 hazardous waste once it is removed from the ground until such time as a No Longer Contained in Determination can be approved by DEQ following analytical testing. Groundwater monitoring events have been conducted at the Property periodically since approximately 2007. As a result, the groundwater gradient beneath the Property has been calculated to flow in a north-northeasterly direction for all events conducted at the Property. Results indicated previous PCE impacts to groundwater on the Site have ranged from 100,000 micrograms per liter (µg/L) at the former location of MW-5 in the suspected source area to 610 µg/L in MW-6 located at the approximate northeast corner of

the Site, or the furthest on-Site downgradient position relative to groundwater flow direction indicating that groundwater impacts may extend into E. 40th Avenue and/or Donald Street (see Figure 2 for approximate extent of groundwater impacts).

Over 7,000-gallons of water infiltrating the IRA excavation was treated on Property and discharged under permit to the City of Eugene sanitary sewer system during the IRA described above. As of September 19, 2022 groundwater concentrations of PCE and TCE in replacement well MW-5R installed within the IRA excavation footprint are 112 µg/L and 1.29 µg/L, respectively.

Cumulative groundwater analytical results are included in **Table 1**, and historic soil analytical results are included in **Table 2**.

3.0 SOIL MANAGEMENT METHODS

Based on soil testing completed to date, except for a small area south of the shopping center where residual soil contamination may be present (Figure 2), detectable levels of chlorinated VOCs including PCE and TCE are not expected to be present on-or off-site in soil. As such no special handling of soils is required unless obvious signs of contamination (staining, petroleum odors, etc.) are observed during excavation activities.

3.1 RESPONSIBLE PERSONNEL

A qualified environmental professional (EP) will provide training to construction personnel who will be present during grading and excavation activities and who will be responsible for determining reuse/disposal options for excess soil. This training will include: 1) familiarizing construction personnel with all environmental data obtained at the Property, and 2) educating construction personnel regarding the lines of evidence that may indicate the presence of petroleum or hazardous substances in soil. The EP will be on-Property periodically during grading or other intrusive activities to ensure that construction personnel are sufficiently knowledgeable to act in the role of responsible person. The EP also will be "on-call" to answer questions via phone and/or to travel to the Property should assistance with soil management be required.

3.2 SOIL CLASSIFICATIONS AND METHODS OF CLASSIFICATION

Soil excavated during construction at the Property will be classified either as 1) petroleum-containing soil that exhibits characteristic staining or odor such as may be encountered in the vicinity of the former McCool Brothers gasoline station near the northeastern corner of the property (referred to herein as "PCS); 2) or 2) unanticipated and unknown contaminated soil, which is soil exhibiting evidence of contamination inconsistent with that typical of PCS. Soil classification will be based on available environmental assessment data, and upon olfactory and visual lines of evidence (e.g., odor and staining). Each soil type, and the methods that will be used in classifying soil types, is described below.

3.2.1 PCS

During assessment activities at the former gasoline service station/car wash completed at the northeast corner of the Property, soil containing petroleum and exhibiting staining and odors was identified in the vicinity of the underground storage tanks (USTs) at a depth extending to about 14 feet bgs. The former USTs previously decommissioned by filling with pea gravel, were removed in 1991 and approximately 200 cubic yards of prior backfill, pea gravel and weathered bedrock were excavated and disposed off-Site. Based on this information, it is not anticipated that substantial soil contamination remains. PCS characteristics include: 1) staining, generally dark gray in color; 2) a gasoline-, diesel-, or heavy oil-like odor; and/or 3) elevated photo-ionization detector (PID) instrument measurements.

PCS may be disposed off-Site at an appropriate disposal facility (i.e. RCRA Subtitle D permitted landfill), such as the Coffin Butte landfill in Corvallis, Oregon.

3.2.2 Unanticipated and Unknown Contaminated Soil

Although the Property has been adequately assessed, areas and types of impact in unassessed areas where hazardous substance releases may have occurred may be discovered during redevelopment of the Property (see Figure 2). The unanticipated and unknown soil type is used to categorize soil dissimilar in nature from PCS. On-Property reuse of unanticipated and unknown soil is not permitted. Following further evaluation (required when unanticipated and unknown soil is identified) soil initially classified as unanticipated and unknown contaminated soil may be reclassified. Soil discovered within the environmental management area containing PCE or its degradation products (i.e., TCE, cis 1,2 dichloroethene) should be assumed to be F002 hazardous waste until a No Longer Contained In (NLCI) following laboratory analysis, is approved by the DEQ (see Section 4.2). If these conditions arise, all soil must remain on-Site near the environmental management area until disposal options are determined and if necessary, DEQ approval is provided.

3.3 SOIL EXCAVATION OBSERVATION AND MONITORING

During construction grading/excavation activities all soil removed, particularly in the areas presented on Figure 2 with possible residual impacts by dry cleaning chemicals and soils beneath the current buildings if removed, must be inspected to confirm it has been properly classified. Inspection methods employed must include:

- Observation of the soil for visual evidence of contamination (i.e., staining).
- Observation of the soil for olfactory evidence of contamination (i.e., diesel- or heavy oil-like odors); and
- Observation of the soil for unusual staining, or chemical odors other than diesel- or heavy oil-like odors.

It is strongly suggested that a PID also be utilized when inspecting/screening soils as a final line of evidence.

3.4 EXCLUSION ZONE AND DECONTAMINATION

Before beginning soil excavation where contamination is possible (i.e., below and within 3-feet of the former dry cleaner), the Contractor must establish an exclusion zone around the excavation/grading area. Fencing of the exclusion zone is required during the entire duration of the excavation/grading project to minimize access to the exclusion zone by unauthorized persons. Entrance/exit locations to the exclusion zone must be limited. The boundaries of the exclusion zone must be located at or wholly within the boundaries of the Property. Designation of the entire Property as the exclusion zone during Property grading and excavation activities is acceptable.

Equipment may move freely within the exclusion zone. Equipment washing is not required within the exclusion zone. Equipment must be broom-cleaned when moving between excavation areas within the exclusion zone. If practicable, truck loading areas should be established at the boundary of the exclusion zone so that trucks may be loaded without entering the exclusion zone, thereby eliminating required decontamination upon exiting the exclusion zone. Trucks must be broom-cleaned before leaving the loading area. Decontamination procedures for personnel exiting the exclusion zone must be described in the site-specific health and safety plan prepared for the Property by the Contractor.

3.5 CONTROL OF PCS AND OTHER CONTAMINATED SOIL

The Contractor must use means and methods to prevent off-Property migration of any visible or measurable quantities of PCS or other contaminated soils (if any) as airborne dust, track-out, or stormwater runoff. For example, if/as needed the Contractor may need to provide the following.

1. A water truck to wet soils to suppress airborne dust.
2. Broom clean soil from the exterior of vehicles before they leave designated soil loading areas or the Property.
3. Graveled aprons and/or a wheel wash at egress point(s) from the Property.
4. Catch basin sediment filters installed in catch basins located in streets near the Property to prevent PCS or other contaminated soils from entering the City of Eugene stormwater management system.
5. Silt fences or other erosion control devices to prevent PCS or other contaminated soils suspended in stormwater from migrating off-Property.

3.6 STAGING OF EXCESS CONTAMINATED SOIL

Temporary staging and or stockpiling of excess soil by the Contractor may be permitted in areas designated by the EP. Excess soil temporarily stockpiled on-Property must be segregated by type, placed on plastic sheeting (6-mil minimum), covered with tarps during periods of rain, wind or inactivity to prevent transport of soil. The edges of the tarps must be weighed down. Stockpiles must be always kept neat.

If directed and authorized by EP, the Contractor may temporarily stockpile soil classified as PCS and/or unanticipated and unknown contaminated soil but must separate PCS stockpiles from unanticipated or unknown soil stockpiles. The soil must be placed atop plastic sheeting and surrounded by a berm. The stockpile also must be covered with tarps during periods of rain, wind or inactivity to prevent soil transport. The edges of the tarps must be weighed down.

3.7 EXCAVATION AND LOADING OF CONTAMINATED SOIL

Soil excavated from the area of possible residual soil impacts by PCE in the alley south of the shopping center (Figure 2) may contain detectable levels of PCE and other VOCs. Upon soil testing, if PCE or underlying constituents (trichloroethylene [TCE], cis-1,2-dichloroethylene, vinyl chloride) are detected, the soil should be considered to contain a listed hazardous waste and must be handled and disposed of such unless a NLCI determination is made by the DEQ (Section 4.2)

The Contractor must load all soil being transported off-Site for disposal using the following procedures.

1. Notify the EP no less than 24 hours prior to beginning excavation of Site soil.
2. Use water as necessary to prevent the generation of visible dust during excavation activities. The Contractor will minimize equipment traffic through the exclusion zone to prevent PCS or other contaminated soils from being transported via track-off to other parts of the Site, or off Site.
3. Maintain excavation equipment in good working order. The Contractor must immediately clean up any spilled hydraulic oils or other hazardous substances from equipment.
4. Locate loading areas for potentially impacted soil, at the edge of (preferred), the exclusion zone.
5. Wet impacted soil with free water will not be loaded into trucks.
6. Load trucks in a manner that prevents the spilling, tracking or dispersal of contaminated soil. Cover all loads prior to exiting the Property.
7. Remove contaminated soil from the exterior of each truck before the truck leaves the loading area. Place any contaminated soil collected in the loading area back into the truck.
8. Establish specific truck haul routes before beginning off-Site contaminated soil transport.
9. Ensure that loaded truck weights are within acceptable limits.

3.8 TRANSPORTATION OF PCS OR OTHER CONTAMINATED SOIL

The Contractor must comply with all applicable federal, state, or local laws, codes, and ordinances that govern or regulate contaminated soil transportation. Prior to transportation, obtain all required permits and furnish all labor, materials, equipment, and incidentals required for soil transport. Ensure that all drivers hauling contaminated soil have in their possession all applicable state and local vehicle insurance requirements, valid driver's license, and vehicle registration and license. Inform all drivers of haul vehicles of the following.

1. The nature of the material being hauled.
2. The required route to and from the disposal site and/or disposal staging area.
3. The applicable city street regulations and requirements, and State of Oregon Department of Transportation codes, regulations and requirements.
4. The legal maximum load limits per vehicle.

Do not allow PCS or other contaminated soil to be spilled or tracked off-Site. No visible or measurable contaminated soil may be released to off-Site areas. Cover the load of each truck carrying contaminated soil with a well-secured tarp prior to leaving the Property. All contaminated soil on the exterior of the trucks must be removed prior to the truck leaving the Site. Trucks will not be allowed off-Site if free liquids are draining from the load. The Contractor must be prepared to line trucks upon request by the EP and use trucks for the transportation of contaminated soil that are substance compatible, licensed, insured,

and permitted pursuant to federal, state, and local statutes, rules, regulations and ordinances. Provide all weigh tickets issued by the disposal facility that receives contaminated soil.

3.9 DISPOSAL OF PCS AND OTHER CONTAMINATED SOILS

Contaminated soil will be transported to a landfill permitted to accept it. Soils classified as a solid waste will be permitted for disposal at the Coffin Butte landfill, which is a RCRA Subtitle D permitted landfill. Unanticipated and unknown soil classified as a hazardous waste (if any) will be permitted for disposal at the Chemical Waste Management Arlington RCRA Subtitle C Landfill (or equivalent). Prior to excavation, transportation, and disposal of contaminated soil, the Contractor must obtain acceptance from the landfill for disposal of the soil. If necessary, the EP will assist the Contractor in obtaining required disposal permits. Prior to initiating soil hauling/disposal, the Contractor must submit permit documents authorizing acceptance of the soil by the disposal facility to Stantec for review and approval.

At least 14 days prior to transport of contaminated soil, the Contractor must provide a contact name and solid waste permit number for each facility that will receive contaminated soil. The Contractor must provide the EP at least 72-hour notice prior of initial transport of contaminated soil off the Property, and at least 24-hour notice for all subsequent contaminated soil transportation events.

The Contractor must properly prepare bills of lading or other related documents required by the disposal facility. All receipts for disposal must be submitted to the EP within 2 days of receipt of the contaminated soil at the disposal facility.

3.10 UNANTICIPATED AND UNKNOWN CONTAMINATED SOIL MANAGEMENT

The Contractor must complete the following in response to suspected unanticipated and unknown contaminated soil identified by the monitoring procedures described in Section 3.3.

1. Upon discovery of suspected unanticipated and unknown contaminated soil, immediately suspend all activities in the vicinity and notify the EP.
2. Within 4 hours of notification the EP will conduct an initial field evaluation and will assess whether the soil is potential unanticipated and unknown contaminated soil that requires further evaluation. If the field evaluation indicates that the soil is potential unanticipated and unknown contaminated soil, the EP (with assistance from the Contractor) will collect samples for laboratory analysis. Testing results will be obtained within 72 hours. The EP will discuss with the Contractor whether to continue excavating soils and placing soil in temporary stockpiles or cease excavation until laboratory testing results are received.
3. Suspect unanticipated and unknown contaminated soils must be stockpiled separately from other soils. Suspect unanticipated and unknown contaminated soil must be placed atop plastic sheeting (6-mil minimum) and surrounded by a berm. The stockpile must also be covered with tarps during periods of rain, wind or inactivity to prevent soil transport. The edges of the tarps must be weighed down.
4. The stockpile must be always kept neat.
5. The EP must approve the location of any and all suspected unanticipated and unknown contaminated soil stockpiles.

If the EP determines that potentially hazardous unanticipated and unknown contaminated soil has been encountered, the Contractor will comply with the following requirements.

1. Secure the area as necessary to restrict and protect workers and the public from exposure.
2. Modify the Site-specific Health and Safety Plan (HASP) prepared by the Contractor as necessary, to address new contaminants, hazards, and other contaminated media concerns associated with the unanticipated and unknown contamination. The EP will provide unanticipated and unknown contaminated soil sampling and analysis results to assist in making appropriate document modifications. Stantec will approve all document modifications.
3. Do not excavate, temporarily store, manage, load, haul, or dispose potentially hazardous unanticipated and unknown contaminated soil until directed by the EP. Once directed, perform all excavation, temporary storage, management, loading, hauling, and disposal of unanticipated and unknown contaminated soil in accordance with Sections 3.5 through 3.9 of this CMMP.
4. Until authorized by the EP, do not transport unanticipated and unknown contaminated soil off-Property. The EP will direct the disposal of the unanticipated and unknown contaminated soil. If the contaminated soil is a RCRA or state-only hazardous waste, remove and dispose of the soil within 30 days of being directed by the EP.
5. If underground storage tanks (USTs) are encountered, immediately inform the EP, and manage according to Oregon Administrative Rules (OAR) 340-122. The Contractor must provide complete written documentation to Stantec of full compliance with all applicable UST regulatory requirements.

4.0 GROUNDWATER MANAGEMENT

Groundwater sampling at the Property has indicated evidence of significant groundwater contamination and is considered a F002 hazardous waste once it is removed from the ground. The area of contaminated groundwater is shown on Figure 2. Activities required at the Property to facilitate construction dewatering, specifically in the area where groundwater contamination has been documented ,are different than those required at a clean site.

Should construction dewatering of groundwater and disposal be necessary within the blue area depicted on Figure 2 during Site redevelopment, the Contractor must, at a minimum, follow permit requirements described in the City of Eugene Public Works Department permit for discharge of pre-treated water into the City-owned sanitary sewer system. Other permits may be required. If it meets DEQ Risk-Based Concentrations (RBCs), Toxicity Characteristic Leaching Procedure (TCLP) and land disposal restrictions (LDRs) then DEQ may be able to prepare a NLCI determination (Section 4.2, below). It is the responsibility of the Contractor to ensure all necessary permits are secured and complied with. Treatment prior to discharge may include bag filtration and activated carbon filtration.

Required protocols include sampling and testing of groundwater. Minimum test parameters for baseline contaminants must include chlorinated volatile organic compounds (VOCs) including PCE, TCE and DCE.

4.1 ONSITE DISPOSAL OF CONTAMINATED GROUNDWATER IN THE POTW

If allowed by the Eugene-Springfield Water Pollution Control Facility (WPCF)/Publicly Owned Treatment Works (POTW) operator, ground water from the areas of the site shown on Figure 2, which may contain low levels of listed hazardous waste constituents, is allowed to be placed/disposed of into the POTW on site, which DEQ considers the area where residual ground water contamination remains (Figure 2). An NLCI determination is NOT required for this to happen, and ODEQ;s Cleanup Program does not need to be involved. If discharge to the POTW is allowed by the POTW operator, DEQ's Cleanup Program would not require that the water be temporarily stored or tested; however, the POTW operator may require this.

4.2 NO LONGER CONTAINED IN DETERMINATION PROCEDURES FOR GROUND WATER OR SOIL

To pursue a NLCI determination for water or soil, NLCI guidance/DEQ Internal Management Directive will need to be followed for all NLCI requests and determinations. The owner or person requesting a NLCI determination for water and/or soil should submit a request, with supporting documentation as required by the NLCI Internal Management Directive, for NLCI determination to the Western Region DEQ Cleanup Program Manager, currently located at the Eugene DEQ office, 165 E 7th Avenue in Eugene, Oregon. The request and documentation can also be emailed to deqwr.cleanup@deq.oregon.gov. If approved, the NLCI determination would likely require that water to be taken to a Clean Water Act permitted water treatment facility and soil be taken to a Subtitle D landfill. DEQ will need to issue its NLCI determination before soil or water can be managed as nonhazardous waste. Only DEQ can make the NLCI determination. If approved, DEQ will prepare and sign a memo granting the NLCI determination. DEQ may also recover its costs for time spent consulting with the generator and preparing the NLCI memo. DEQ may bill/invoice the property owner unless another party agrees to pay DEQ oversight costs. Oversight costs are covered in the EES.

Procedures for Water

Ground water removed from the area depicted on Figure 2 may contain listed hazardous waste (F002) if dry cleaner related VOCs are detected at any level. An NLCI request is typically done after the water is generated and stored in a tank or drum on site (specifically the Edgewood Shopping Center property or city right-of-way).

A representative water sample from the stored water is required to be tested for dry cleaner VOCs by EPA Method 8260. DEQ may accept historical ground water data from ground water samples collected from the work area. For an NLCI determination to be made for water, VOC levels need to be at or below DEQ's RBCs for the Groundwater in an Excavation pathway for DEQ to consider a NLCI determination.

Procedures for Soil

Soil removed from the area of possible residual PCE impacts may contain detectable levels of PCE or underlying VOC constituents and would be considered to contain a listed hazardous waste (F002). If PCE or underlying constituents are detected at any concentration, a NLCI determination may be requested from DEQ. Soil should be stored on site in accordance with Section 3.6 until the determination is made.

The NLCE determination for soil is similar to that for water, and NLCI determinations can be made for soil and water in the same determination. Representative soil sample(s) must include the full list of VOCs. For DEQ to make a NLCI determination for soil, among other things, VOC concentrations must be below the occupational Risk Based Concentrations. If a NLCI determination is or cannot be made, the contaminated soil would be considered to contain and handled as a RCRA hazardous waste.

6.0 CONTRACTOR HEALTH AND SAFETY

The Contractor must develop and implement a site-specific Health and Safety Plan (HASP) designed to ensure compliance with all applicable worker protection regulatory requirements, including 29 CFR 1910.120, the Hazardous Waste Operations, and Emergency Response ("HAZWOPER") rule promulgated by the federal Occupational Safety and Health Administration (OSHA). The HASP must be submitted to the EP for review and approval at least 30 days prior to initiation of Property construction activities. Comments on the HASP will be provided by the EP within 5 working days. The Contractor must resubmit the revised HASP for final review and approval.

During Property construction activities, the Contractor will bear full responsibility for the implementation of its site-specific HASP.

5.1 CONTRACTORS USE OF HAZARDOUS MATERIALS

Contractor shall always properly handle, store, use, and dispose of any hazardous materials brought onto the work site in accordance with all applicable environmental laws as defined herein. In the event of a spill or release of any hazardous material brought onto the work site, the procedures as set forth in the contractors Health and Safety Plan (HASP) or other management plan concerning hazardous materials encountered during construction shall be followed.

6.0 PROJECT MANAGEMENT

Oversight of Contractor construction activities at the Property that are subject to this CMMP will be conducted only by qualified field staff

7.0 CLOSURE DOCUMENTATION

During redevelopment, the excavation and disposal/re-use of any soil classified as PCS will be documented in the field and with a Project Soil Management Report. Documentation requirements are described below.

7.1 FIELD DOCUMENTATION

The Contractor (or the EP while on-Site) must record, at a minimum, data used in making soil management decisions; on-Site observations of excavation and soil management activities (including truck logs); and communications with involved parties and regulatory agencies.

7.2 SITE/PROJECT CLOSURE REPORT

At the conclusion of subsurface construction activities, a Closure Report will be prepared that will include, but is not limited to:

- Description of excavation and soil management activities, including sampling activities and results, and the amount and types of soil excavated and disposed.
- Site maps indicating areas where contaminated soil was removed; where it remains (if any); and where it was re-used.
- Photographs of Site construction activities; and
- Copies of analytical laboratory reports, permits and approvals, and disposal manifests and receipts.

Copies of the Closure Reports shall be maintained by the entity who conducted the work and should be made available to DEQ upon request.

8.0 REFERENCES

DEQ, 2018. Risk-Based Decision Making for the Remediation of Contaminated Sites. Table of generic Risk-Based Concentrations. Amended June 2023.

DEQ 2020. Conducting Contained-In Determinations for Environmental Media found at: https://www.oregon.gov/deq/Filtered%20Library/IMDEnvMediaContainedinDet.pdf

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TABLES

Table 1. Soil Sample Analytical Results
Soil Borings and Well Installations
Edgewood Shopping Center
350-390 E 40th Avenue
Eugene, Oregon

Sample Identification	Sample Date	Sample Depth (feet below ground surface)	PID Field Screening Result	VOCs - 8260B (mg/kg)													
				PCE	TCE	cis-1,2-DCE	Vinyl Chloride	1,1,2,2-Tetrachloroethane	1,1,1-Trichloroethane	Carbon Tetrachloride	Chlorobenzene	1,2-Dichlorobenzene	1,4-Dichlorobenzene	1,1-Dichloroethene	Ethylbenzene	Isopropylbenzene	n-propylbenzene
On-Site Soil Borings																	
B-1	10/16/2007	15'	--	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0065	<0.0066	<0.0066	<0.0066	<0.0066	<0.0065	<0.0066	<0.0066	<0.0066
B-2	10/16/2007	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
B-3	10/16/2007	10'	--	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064	<0.0064
B-4	10/16/2007	5'	--	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
B-5	10/16/2007	10'	--	0.0012	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
B-6	10/16/2007	1'	--	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
B-7	10/16/2007	0.5'	--	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011
B-8	10/16/2007	5'	--	0.0094	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012
B-9	10/16/2007	6'	--	<0.0011	<0.0011	0.0051	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011
B-10	10/16/2007	6'	--	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
B-11	8/20/2008	10'	--	0.0011	0.0011	0.0011	0.0011	0.0011	0.0011	0.0011	0.0011	0.0011	0.0011	0.0011	0.0011	0.0011	0.0011
B-12	8/20/2008	10'	--	<0.067	0.78	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015	<0.0015
B-12	8/20/2008	15'	--	0.024	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012
B-13	8/20/2008	18'	--	0.51	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012
B-14	8/20/2008	10'	--	0.26	0.008	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012	<0.0012
Shallow Monitoring Wells[1]																	
MW-6	8/20/2008	10'	--	<0.0013	<0.0013	0.022	0.01	<0.0013	<0.0013	<0.0013	<0.0013	<0.0013	<0.0013	<0.0013	<0.0013	0.002	0.0061
MW-7-1-3	1/29/2018	1' - 3'	0.4	<0.0401	<0.0401	<0.0401	<0.0401	<0.0802	<0.0401	<0.0802	<0.0401	<0.0401	<0.0401	<0.0401	<0.0401	<0.0802	<0.0401
Duplicate X	1/29/2018	1' - 3'	0.4	<0.0420	<0.0420	<0.0420	<0.0420	<0.0839	<0.0420	<0.0839	<0.0420	<0.0420	<0.0420	<0.0420	<0.0420	<0.0839	<0.0420
Deep Monitoring Well																	
DW-1-5	9/26/2017	5'	55.0	1.370	<0.0408	<0.0408	<0.0408	<0.0816	<0.0408	<0.0816	<0.0408	<0.0408	<0.0408	<0.0408	--	--	--
DW-1-15	9/26/2017	15'	7.0	1.110	<0.0348	<0.0348	<0.0348	<0.0696	<0.0348	<0.0696	<0.0348	<0.0348	<0.0348	<0.0348	--	--	--
Off-Site Soil Boring																	
SB-2-7-8	1/29/2018	7' - 8'	0.2	<0.0375	<0.0375	<0.0375	<0.0375	<0.0751	<0.0375	<0.0751	<0.0375	<0.0375	<0.0375	<0.0375	<0.0375	<0.0751	<0.0375
Generic RBC_{20} Occupational Volatilization to Outdoor Air				>Csat	96	>Max	89	NA	>Csat	62	>Csat	>Csat	36	>Csat	160	>Csat	NA
Generic RBC_{10} Urban Residential Volatilization to Outdoor Air				>Csat	33	>Max	6.5	NA	>Csat	35	>Csat	>Csat	19	>Csat	85	>Csat	NA
Generic RBC_{II} Occupational Vapor Intrusion into Buildings				36	2.3	>Max	2.2	NA	>Csat	1.6	>Max	>Csat	13	680	17	>Csat	NA
Generic RBC_{II} Urban Residential Vapor Intrusion into Buildings				6.6	0.26	>Max	0.053	NA	>Csat	0.28	77	>Csat	2.3	54	3.0	>Csat	NA
Generic RBCss Urban Residential Soil Ingestion, Dermal Contact, Inhalation				540	17	310	0.8	NA	>Csat	21	>Csat	>Csat	62.0	>Csat	110	>Csat	NA
Generic RBC_{IS} Occupational Soil Ingestion, Dermal Contact, Inhalation				1,000	51	>Csat	4.4	NA	>Csat	34	>Csat	>Csat	64.00	>Csat	150	>Csat	NA
Generic RBC_{IS} Construction Worker Ingestion/Dermal Contact/Inhalation				1,800	470	710	34	NA	>Csat	320	>Csat	>Csat	>Csat	>Csat	>Csat	>Csat	NA
Generic RBC_{IS} Excavation Worker Ingestion/Dermal Contact/Inhalation				50,000	13,000	>Csat	>Csat	NA	>Max	>Csat	>Csat	>Csat	>Csat	>Csat	>Csat	>Csat	NA

NOTES:
PID = Photoionization Detector
PCE = Tetrachloroethene
TCE = Trichloroethene
cis-1,2-DCE = cis-1,2-Dichloroethene
-- = Not Analyzed, Not Applicable or Not Available
mg/kg = Milligrams per kilogram
Grey Shaded = soil boring location removed during 2020 Interim Removal Action
Yellow Shaded = Detected value in excess of one or more RBCs
* = Well DW-1 abandoned by overdrilling prior to 2020 Excavation
Oregon Department of Environmental Quality Risk-Based Concentrations (RBCs), May 2018 revision
>Csat = This soil RBC exceeds the limit of three-phase equilibrium partioning. Soil concentrations in excess of Csat indicate that free product might be present.
>Max = The constituent RBC for this pathway is calculated as greater than 1,000,000 mg/kg or 1,000,000 mg/L. Therefore, this substance is deemed not to pose risks in this scenario.
NA = No RBC is listed for this analyte
[1] = Soil analytical data unavailable for shallow monitoring wells MW-1 through MW-5 (installed by BB&A Environmental in the 1990s)

Table 2. Groundwater Sample Analytical Results - Volatile Organic Compoundss
Edgewood Shopping Center, 350-390 E 40th Avenue, Eugene, Oregon

Well Number (TOC Elevation)	Sample Date	Depth to Water (feet)	Groundwater Elevation (feet above mean sea level)	VOCs - 8260B (µg/L)														
				PCE	TCE	cis-1,2-DCE	Vinyl Chloride	1,1,2,2-Tetrachloroethane	1,1,1-Trichloroethane	Carbon Tetrachloride	Chlorobenzene	1,2-Dichlorobenzene	1,4-Dichlorobenzene	1,1-Dichloroethene	Ethylbenzene	Isopropylbenzene	n-propylbenzene
MW-1	10/16/2007	7.01	539.14	2,600	32	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
(546.145)	8/14/2008	5.58	540.57	2,800	32	6.4	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	2.0	<1.0	<1.0	<1.0
	11/17/2010	–	–	2,100	28	5.8	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	1.4	<1.0	<1.0	<1.0
	7/20/2011	4.41	541.74	2,660	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	--	--	--
	NaMnO4 Injection Event (Phase I = 8/25/11 to 8/30/11) (Phase II = 10/3/11 to 10/4/11)																	
	2/2/2012	5.05	541.10	3,130	33.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	--	--	--
	11/6/2012	–	–	Not sampled due to car parked over well														
	3/20/2013	4.41	541.74	3,700	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	--	--	--
	10/6/2016	6.10	540.05	3,200	32	3.4	<1.0	<1.0	<3.0	<3.0	<2.0	<2.0	<4.0	<2.0	--	--	--	--
	1/31/2018	4.47	541.68	4,190	35	<4.00	<4.00	<5.00	<4.00	<10.0	<5.00	<5.00	<5.00	<4.00	<5.00	<10.0	<5.00
	2/16/2018	4.43	541.72	–	–	–	–	–	–	–	–	–	–	–	--	--	--	--
	10/21/2020	6.30	539.85	5,550	45.1	4.24	<0.400	<0.500	<0.400	<1.00	<0.500	<0.500	<0.500	2.05	--	--	--	--
	2/22/2021	3.49	542.66	5,900	44.2	<20	<20	<25	<20	<50	<25	<25	<25	<20	--	--	--	--
	8/24/2021	6.77	539.38	5,680	46.7	<20	<20	<25	<20	<50	<25	<25	<25	<20	--	--	--	--
	3/8/2022	4.50	541.65	4,330	44.0	<40	<40	<50	<40	<100	<50.0	<50	<50	<40	--	--	--	--
	9/19/2022	6.53	539.62	4,640	45.0	<40	<40	<50.0	<40.0	<100	<50.0	<50.0	<50.0	<40.0	--	--	--	--
MW-2	10/16/2007	4.82	540.68	800	7.4	7.3	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
(545.495)	8/14/2008	5.09	540.41	740	6.5	5.9	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
	3/17/2010	–	–	640	6.1	5.4	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
	11/18/2010	–	–	640	5.0	5.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
	7/20/2011	3.58	541.92	754	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	--	--	--	--
	NaMnO4 Injection Event (Phase I = 8/25/11 to 8/30/11) (Phase II = 10/3/11 to 10/4/11)																	
	2/2/2012	4.10	541.40	947	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	--	--	--	--
	11/6/2012	4.89	540.61	920	<20	<20	<20	<20	<20	<20	<20	<20	<20	<20	--	--	--	--
	3/20/2013	3.80	541.70	930	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	--	--	--	--
	10/6/2016	5.10	540.40	1,500	7.6	3.2	<1.0	<1.0	<3.0	<3.0	<2.0	<2.0	<4.0	<2.0	--	--	--	--
	1/31/2018	3.54	541.96	1,820	8.53	<4.00	<4.00	<5.00	<4.00	<10.0	<5.00	<5.00	<5.00	<4.00	<5.00	<10.0	<5.00
	2/16/2018	3.60	541.90	–	–	–	–	–	–	–	–	–	–	–	--	--	--	--
	10/21/2020	5.61	539.89	2,160	11.7	3.06	<0.400	<0.500	<0.400	<1.00	<0.500	<0.500	<0.500	<0.400	--	--	--	--
	2/22/2021	3.29	542.21	2,450	16.8	4.99	<0.800	<1.00	<0.800	<2.00	<1.00	<1.00	<1.00	<0.800	--	--	--	--
	8/24/2021	–	–	Not sampled, well inaccessable														
	3/8/2022	3.66	541.84	1,860	27.0	<20	<20	<25	<20	<50	<25	<25	<25	<20	--	--	--	--
	9/19/2022	5.53	539.97	1,890	21.5	<20	<20	<25	<20	<50	<25	<25	<25	<20	--	--	--	--

Table 2. Groundwater Sample Analytical Results - Volatile Organic Compounds
Edgewood Shopping Center, 350-390 E 40th Avenue, Eugene, Oregon

Well Number (TOC Elevation)	Sample Date	Depth to Water (feet)	Groundwater Elevation (feet above mean sea level)	VOCs - 8260B (µg/L)														
				PCE	TCE	cis-1,2-DCE	Vinyl Chloride	1,1,2,2-Tetrachloroethane	1,1,1-Trichloroethane	Carbon Tetrachloride	Chlorobenzene	1,2-Dichlorobenzene	1,4-Dichlorobenzene	1,1-Dichloroethene	Ethylbenzene	Isopropylbenzene	n-propylbenzene
MW-3	10/17/2007	4.18	538.41	840	7.5	7.2	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
(542.588)	8/14/2008	4.35	538.24	860	7.1	6.6	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
	3/17/2010	--	--	660	6.6	5.5	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
	11/16/2010	--	--	570	4.9	4.4	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
	7/20/2011	3.16	539.43	675	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	--	--	--
	NaMnO4 Injection Event (Phase I = 8/25/11 to 8/30/11) (Phase II = 10/3/11 to 10/4/11)																
	2/2/2012	4.05	538.54	793	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	--	--	--
	11/6/2012	4.25	538.34	790	<20	<20	<20	<20	<20	<20	<20	<20	<20	<20	--	--	--
	3/20/2013	3.61	538.98	700	<20	<20	<20	<20	<20	<20	<20	<20	<20	<20	--	--	--
	10/6/2016	4.72	537.87	930	5.1	2.6	<1.0	<1.0	<3.0	<3.0	<2.0	<2.0	<4.0	<2.0	--	--	--
Dup 100616	10/6/2016	4.72	537.87	950	5.5	2.8	<1.0	<1.0	<3.0	<3.0	<2.0	<2.0	<4.0	<2.0	--	--	--
	1/31/2018	3.15	539.44	1,120	5.86	<4.00	<4.00	<5.00	<4.00	<10.0	<5.00	<5.00	<5.00	<4.00	<5.00	<10.0	<5.00
	2/16/2018	3.19	539.40	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	10/21/2020	4.84	537.75	1,090	6.50	1.48	<0.400	<0.500	<0.400	<1.00	<0.500	<0.500	<0.500	<0.400	--	--	--
	2/22/2021	3.07	539.52	1,660	9.31	<4.00	<4.00	<5.00	<4.00	<10.0	<5.00	<5.00	<5.00	<4.00	--	--	--
	8/24/2021	4.86	537.73	838	<8.00	<8.00	<8.00	<10.0	<8.00	<20.0	<10.0	<10.0	<10.0	<8.00	--	--	--
	3/8/2022	3.60	538.99	1,280	12.8	<8.00	<8.00	<10.0	<8.00	<20.0	<10.0	<10.0	<10.0	<8.00	--	--	--
	9/19/2022	4.60	537.99	1,070	10	<8.00	<8.00	<10.0	<8.00	<20.0	<10.0	<10.0	<10.0	<8.00	--	--	--
MW-4	10/17/2007	6.95	541.31	2,300	15	27	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
(548.757)	8/14/2008	7.22	541.54	1,700	11	18	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
	3/17/2010	--	--	1,800	4.9	4	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
	11/18/2010	--	--	2,100	19	15	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
	7/20/2011	5.93	542.33	2,790	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	--	--	--
	NaMnO4 Injection Event (Phase I = 8/25/11 to 8/30/11) (Phase II = 10/3/11 to 10/4/11)																
	2/2/2012	5.90	542.36	3,120	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	--	--	--
	11/6/2012	7.06	541.70	2,300	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	--	--	--
	3/20/2013	5.92	542.34	2,100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	--	--	--
	8/18/2016	8.10	540.56	<3,000	32	<1,000	<1.0	<1.0	<3.0	<3.0	<2.0	<2.0	<4.0	<2.0	--	--	--
	10/6/2016	8.78	539.98	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	1/30/2018	5.30	543.46	5,040	38.4	3.75	<0.400	<0.500	1.5	<1.00	<0.500	0.535	<0.500	1.96	<0.500	<1.00	<0.500
Dup Y	1/30/2018	5.30	543.46	4,960	37.5	3.61	<0.400	<0.500	1.4	<1.00	<0.500	0.5	<0.500	1.99	<0.500	<1.00	<0.500
	2/16/2018	5.92	542.34	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	10/21/2020	8.42	540.34	4,920	40.7	4.54	<0.400	<0.500	1.07	<1.00	<0.500	<0.500	<0.500	1.24	--	--	--
DUP-01	10/21/2020	--	--	5,020	40.5	4.49	<0.400	<0.500	0.941	<1.00	<0.500	<0.500	<0.500	1.26	--	--	--
	2/22/2021	4.90	543.36	6,160	49.1	<20	<20	<25	<20	<50	<25	<25	<25	<20	--	--	--
	8/24/2021	8.55	540.21	5,620	51.5	<20	<20	<25	<20	<50	<25	<25	<25	<20	--	--	--
	3/8/2022	6.09	542.67	4,200	46	<40	<40	<50	<40	<100	<50	<50	<50	<40	--	--	--
	9/19/2022	8.21	540.55	3,620	<40	<40	<40	<50	<40	<100	<50	<50	<50	<40	--	--	--

Table 2. Groundwater Sample Analytical Results - Volatile Organic Compounds
Edgewood Shopping Center, 350-390 E 40th Avenue, Eugene, Oregon

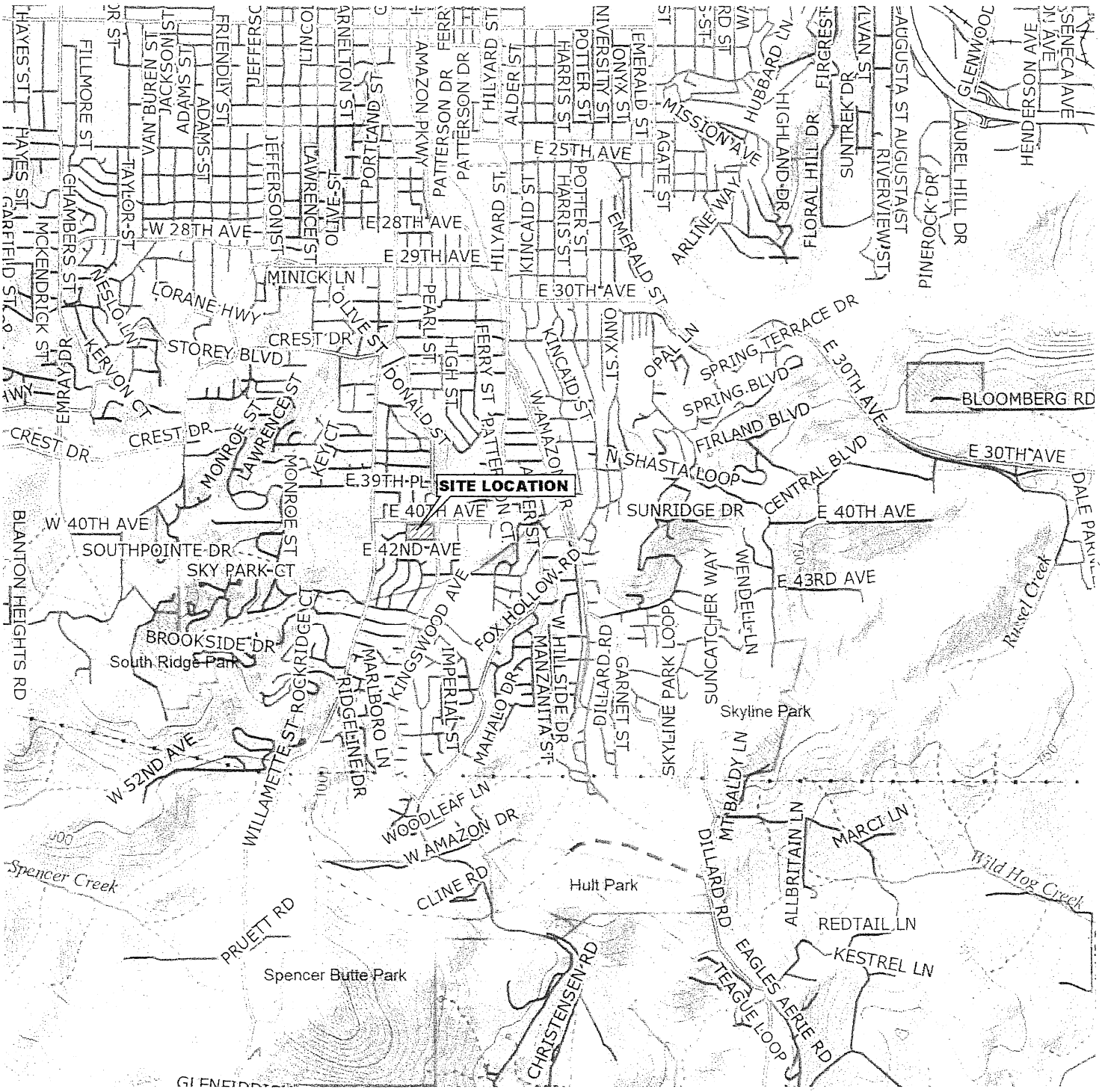
Well Number (TOC Elevation)	Sample Date	Depth to Water (feet)	Groundwater Elevation (feet above mean sea level)	VOCs - 8260B (µg/L)													
				PCE	TCE	cis-1,2-DCE	Vinyl Chloride	1,1,2,2-Tetrachloroethane	1,1,1-Trichloroethane	Carbon Tetrachloride	Chlorobenzene	1,2-Dichlorobenzene	1,4-Dichlorobenzene	1,1-Dichloroethene	Ethylbenzene	Isopropylbenzene	n-propylbenzene
MW-5	10/17/2007	6.25	542.90	120,000	1,000	<25.0	<25.0	66	150	<25	<25	<25	<25	<25	<25	<25	<25
(549.151)	8/14/2008	6.69	542.46	100,000	1,100	42	<1.0	260	110	19	15	6.5	1.5	9.4	1.3	2.1	1.0
	3/17/2010	--	--	130,000	650	<200	<200	<200	<200	<200	<200	<200	<200	<200	<200	<200	<200
	11/18/2010	--	--	140,000	1,000	<250	<250	<250	<250	<250	<250	<250	<250	<250	<250	<250	<250
	7/20/2011	5.03	544.12	118,000	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	--	--	--
	NaMnO4 Injection Event (Phase I = 8/25/11 to 8/30/11) (Phase II = 10/3/11 to 10/4/11)																
	2/2/2012	4.65	544.50	No sample collected due to unreacted NaMnO4 observed in well													
	11/6/2012	6.10	543.05	130,000	<5,000	<5,000	<5,000	<5,000	<5,000	<5,000	<5,000	<5,000	<5,000	<5,000	--	--	--
	3/20/2013	5.03	544.12	99,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	--	--	--
	8/18/2016	7.78	541.37	150,000	<3,000	<1,000	<1.0	<1.0	19	<3.0	2.7	12	<4.0	2.7	--	--	--
	10/6/2016	7.94	541.21	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	1/31/2018	4.41	544.74	100,000	143	7.63	<4.00	<5.00	10.9	<10.0	<5.00	9.47	<5.00	<4.00	<5.00	<10.0	<5.00
	2/16/2018	5.11	544.04	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/20/2020	7.27	541.88	43,800	<200	<200	<200	<250	<200	<500	<250	<250	<250	<200	<250	<500	<250
	Well abandoned during August 2020 excavation																
MW-5R	10/21/2020	7.55	541.12	1,320	21.2	2.38	<0.400	<0.500	<0.400	<1.00	<0.500	<0.500	<0.500	<0.400	--	--	--
(548.670)	2/22/2021	3.07	545.60	857	24.6	8.64	<4.00	<5.00	<4.00	<10.0	<5.00	<5.00	<5.00	<4.00	--	--	--
DUP 022221	2/22/2021	--	--	813	22.6	8.58	<4.00	<5.00	<4.00	<10.0	<5.00	<5.00	<5.00	<4.00	--	--	--
	8/24/2021	7.76	540.91	360	16.3	9.96	<4.00	<5.00	<4.00	<10.0	<5.00	<5.00	<5.00	<4.00	--	--	--
DUP 802421	8/24/2021	--	--	389	16.9	10.1	<4.00	<5.00	<4.00	<10.0	<5.00	<5.00	<5.00	<4.00	--	--	--
	3/8/2022	4.40	544.27	248	<2.00	<2.0	<2.00	<2.50	<2.00	<5.00	<2.50	<2.50	<2.50	<2.00	--	--	--
DUP 030822	3/8/2022	--	--	276	<2.00	<2.00	<2.00	<0.500	<0.400	<5.00	<2.50	<2.50	<2.50	<2.00	--	--	--
	9/19/2022	7.35	541.32	112	1.29	0.670	<0.400	<0.500	<0.400	<1.00	<0.500	<0.500	<0.500	<0.400	--	--	--
DUP 091922	9/19/2022	--	--	88.6	1.14	0.600	<0.400	<0.500	<0.400	<1.00	<0.500	<0.500	<0.500	<0.400	--	--	--
MW-6	8/14/2008	1.96	533.08	590	22	6.1	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
(535.039)	3/17/2010	--	--	680	30	7.5	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
	11/16/2010	--	--	620	26	8.4	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
	7/20/2011	1.76	533.28	633	19.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	--	--	--
	NaMnO4 Injection Event (Phase I = 8/25/11 to 8/30/11) (Phase II = 10/3/11 to 10/4/11)																
	2/2/2012	1.74	533.30	765	31.8	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	--	--	--
	11/6/2012	0.99	534.05	640	24	<10	<10	<10	<10	<10	<10	<10	<10	<10	--	--	--
	3/20/2013	1.54	533.50	590	25	<20	<20	<20	<20	<20	<20	<20	<20	<20	--	--	--
	10/6/2016	1.77	533.27	530	17	4.0	<1.0	<1.0	<3.0	<3.0	<2.0	<2.0	<4.0	<2.0	--	--	--
	1/30/2018	1.33	533.71	610	26.0	4.65	<4.00	<5.00	<4.00	<10.0	<5.00	<5.00	<5.00	<4.00	<5.00	<10.0	<5.00
	2/16/2018	1.69	533.35	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	10/21/2020	--	--	Not sampled, well inaccessable													
	2/22/2021	1.32	533.72	915	33.0	4.27	<4.00	<5.00	<4.00	<10	<5.00	<5.00	<5.00	<4.00	--	--	--
	8/24/2021	1.74	533.30	841	23.9	<4.00	<4.00	<5.00	<4.00	<10	<5.00	<5.00	<5.00	<4.00	--	--	--
	3/8/2022	1.40	533.64	724	29.2	4.40	<4.00	<5.00	<4.00	<10	<5.00	<5.00	<5.00	<4.00	--	--	--
	9/19/2022	1.46	533.58	698	19.7	<4.00	<4.00	<5.00	<4.00	<10	<5.00	<5.00	<5.00	<4.00	--	--	--
MW-7	1/31/2018	7.48	539.08	28.8	0.947	<0.400	<0.400	<0.500	<0.400	<1.00	<0.500	<0.500	<0.500	<0.400	<0.500	<1.00	<0.500
(546.562)	2/16/2018	5.04	541.52	56.1	3.08	<0.400	<0.400	<0.500	<0.400	<1.00	<0.500	<0.500	<0.500	<0.400	<0.500	<1.00	<0.500
	10/21/2020	5.74	540.82	184	8.47	<0.400	<0.400	<0.500	<0.400	<1.00	<0.500	<0.500	<0.500	<0.400	--	--	--
	2/22/2021	4.18	542.36	174	4.44	<0.400	<0.400	<0.500	<0.400	<1.00	<0.500	<0.500	<0.500	<0.400	--	--	--
	8/24/2021	5.68	540.88	134	4.08	<0.800	<0.800	<1.00	<0.800	<2.00	<1.00	<1.00	<1.00	<0.800	--	--	--
	3/8/2022	5.16	541.40	177	5.23	<0.400	<0.400	<0.500	<0.400	<1.00	<0.500	<0.500	<0.500	<0.400	--	--	--
	9/19/2022	6.60	539.96	117	3.28	<0.800	<0.800	<1.00	<0.800	<2.00	<1.00	<1.00	<1.00	<0.800	--	--	--

Table 2. Groundwater Sample Analytical Results - Volatile Organic Compoundss
Edgewood Shopping Center, 350-390 E 40th Avenue, Eugene, Oregon

Well Number (TOC Elevation)	Sample Date	Depth to Water (feet)	Groundwater Elevation (feet above mean sea level)	VOCs - 8260B (µg/L)														
				PCE	TCE	cis-1,2-DCE	Vinyl Chloride	1,1,2,2-Tetrachloroethane	1,1,1-Trichloroethane	Carbon Tetrachloride	Chlorobenzene	1,2-Dichlorobenzene	1,4-Dichlorobenzene	1,1-Dichloroethene	Ethylbenzene	Isopropylbenzene	n-propylbenzene
DW-1 (549.012)	1/31/2018	4.20	544.81	3,890	20.1	13.4	<4.00	<5.00	5.5	<10.0	<5.00	<5.00	<5.00	<4.00	<5.00	<10.00	<5.00
	Well abandoned during August 2020 excavation																	
Soil Boring																		
SB-2	1/30/2018	11.35	--	40.5	9.64	2.64	<0.800	<1.00	<0.800	<2.00	<1.00	<1.00	<1.00	<0.800	<1.00	<2.00	<1.00
Generic RBC_{wi} Occupational Vapor Intrusion				48,000	3,700	>S	880	NA	>S	1,200	>S	>S	7,100	360,000	8,200	>S	NA
Generic RBC_{wi} Urban Residential Vapor Intrusion				8,700	430	>S	21	NA	>S	220	67,000	>S	1,300	29,000	1,500	>S	NA
Generic RBC_{wo} Occupational Volitalization to Outdoor Air				>S	20,000	>S	5,900	NA	>S	7,700	>S	>S	21,000	2,400,000	43,000	>S	NA
Generic RBC_{wo} Urban Residential Volitalization to Outdoor Air				150,000	6,900	>S	430	NA	>S	4,200	>S	>S	12,000	570,000	23,000	>S	NA
Generic RBC_{we} Constrution and Excavation Worker				5,600	3,000	18,000	960	NA	1,100,000	1,800	10,000	37,000	1,500	44,000	4,500	51,000	NA

NOTES:
PCE = Tetrachloroethene
TCE = Trichloroethene
cis-1,2-DCE = cis-1,2-Dichloroethene
Analytes presented include any detected compounds reported at least one time during these sampling events for these wells.
-- = Not Analyzed, Not Applicable, Not Available, or Not Surveyed
µg/L = Micrograms per Liter
(TOC Elevation) = Top of Casing Elevation in Feet
Yellow Shaded = Detected value in excess of one or more RBCs
Oregon Department of Environmental Quality Risk-Based Concentrations (RBCs), May 2018 revision
>S = This groundwater RBC exceeds the solubility limit. Groundwater concentrations in excess of S indicate that free product may be present
NA = No RBC is listed for this analyte

FIGURES



REFERENCE: USGS 7.5 MINUTE QUADRANGLE, EUGENE EAST, OREGON

Stantec

9400 SW BARNES ROAD, SUITE 200
PORTLAND, OREGON
PHONE (503) 297-1631/297-5429 (FAX)

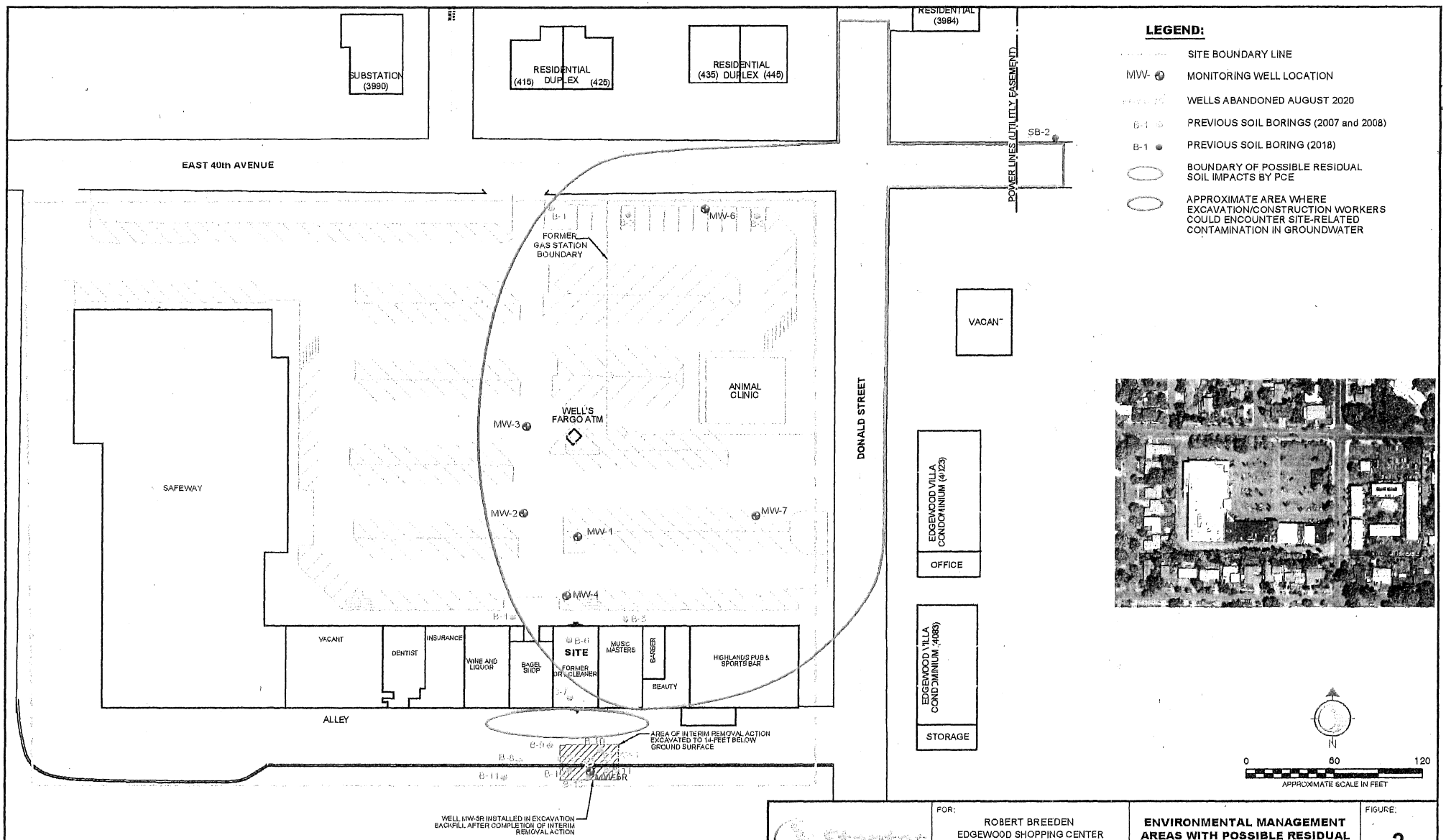
FOR:
ROBERT BREEDEN
EDGEWOOD SHOPPING CENTER
350-390 E 40th AVENUE
EUGENE, OREGON

SITE LOCATION MAP

FIGURE: **1**

JOB NUMBER:	DRAWN BY:	CHECKED BY:	APPROVED BY:	DATE:
185750631	MDR	RM	PF	JAN 2019

FILEPATH:V:\1857\active\Secor\CADD_00 OTHER OFFICES\PORTLAND\BREEDEN BROS\FIG-1_SITE LOC-OREGON.dwg | Layout Tab: Layout1 | Drafter: MiRamirez | Jan 18, 2019 at 14:40



Stantec 601 SW SECOND AVENUE PORTLAND, OREGON PHONE (503) 297-1631/297-5429 (FAX)	FOR: ROBERT BREEDEN EDGEWOOD SHOPPING CENTER 350-390 E 40th AVENUE EUGENE, OREGON		**ENVIRONMENTAL MANAGEMENT AREAS WITH POSSIBLE RESIDUAL CONTAMINATION**		FIGURE: **2**
	JOB NUMBER: 185750631	DRAWN BY: MOR	CHECKED BY: RM	APPROVED BY: P. VAUGHAN	DATE: SEPT 2023

FILEPATH:V:\1858\miscellaneous\secor\CADD\00_OTHER OFFICES\Portland, OR\BREEDEN EROS\2022\FIG-2 EDGEWOOD-3Q-2022.dwg | Layout Tab: FIG-2 SITE PLAN (2) | Drafter: JLieberman | Mar 22, 2024 at 14:37

Oregon DEQ Contained-In Determination (Addendum)
Approval Signoff Sheet

Site Name: Edgewood Cleaners (former) site, ECSI No. 4586
Location: 350-390 E 40th Avenue, Eugene
Request Date 6/11/25 NLCI Request, Stantec
Media: Soil (10 drums IDW)
Approved Disposal: Subtitle D Landfill

DEQ Project Manager: Donald Hanson Date: 6/11/25
Donald Hanson

DEQ HW Staff: Killian Condon (Jun 11, 2025 17:02 PDT) Date : 06/11/2025
Killian Condon

DEQ HSW Program Manager: Becky Williams
Becky Williams (Jun 11, 2025 17:09 PDT) Date: 06/11/2025
Becky Williams

WR Cleanup Manager: Brad Shultz Date: 06/11/2025
Brad Shultz

State of Oregon
Department of Environmental Quality Memorandum

To: **Project File, Edgewood Cleaners, ECSI 4586** **Date: 6/11/2025**

From: **Donald Hanson, WR Cleanup Program**

Through: **Killian Condon, Haz Waste Compliance Inspector**

And: **Becky Williams, WR Materials Management Manager**

Brad Shultz, WR Cleanup Program Manager

Subject: **No Longer Contained-In Determination (Addendum)**
Edgewood Cleaners (former) Site
Eugene, OR (ECSI 4586)

The purpose of this Addendum is to extend the findings of the February 14, 2024 No Longer Contained-In Determination previously made for investigation-derived waste (IDW) for this site. The request is for an additional quantity of soil IDW generated in removal during the decommissioning of monitoring wells. Ten additional 55-gallon drums of soil were generated and stored within the area of contamination.

Only tetrachloroethylene (PCE) was detected in a representative sample collected from the IDW. PCE was detected at a concentration of 1.2 mg/Kg, which is more than three orders of magnitude below DEQ's Construction Worker Risk-Based Concentration for PCE and below the 20 times TCLP limit of 14 mg/Kg for PCE. DEQ Cleanup Project Manager Don Hanson verified this during review of Stantec's June 11, 2025 *Request for No Longer Contained-In Waste Determination Addendum*, submitted on behalf of the owner. The owner plans on disposing of the IDW at Short Mountain Landfill. Therefore, DEQ finds all the conditions of the previous no longer contained-in determination are applicable.

DEQ approves this NLC determination. The soil must be disposed at a Subtitle C or a solid waste permitted Subtitle D lined landfill with approval of the landfill operator. Copies of the disposal receipts must be submitted to DEQ. If the IDW is not managed and disposed of in accordance with DEQ's conditions of approval, the no longer contained-in determination does not apply, the waste remains hazardous waste, and must be managed and disposed of in compliance with applicable hazardous waste laws.

CASH RECEIPT

Waste Management Division
3040 N. Delta Highway, Eugene, OR 97408
682-6923

427364

DATE 6-23-25 SITE# 2 FEE COLL ID 13973

Fee Type	Description	Fee
	Permit # CS004518	
13010	**Up to 1 cubic yd. (202 gal.)**	$14.00
13020	**Over 1 cubic yd. to 3 cubic yds.**	$25.00
12030	Loose, add'l over 3 cubic yds ____ @ $13.00/cy	$____
12050	Construction & Demolition ____ @ $19.00/cy	$____
12055	Rubble/roofing/stump/rock/dirt ____ @ $48.00/cy	$____
53101	Propane tanks ____ @ $4.50/ea	$____
53540	Appliances ____ @ $22.00/ea	$____
	Tires	
53517	<20" no rim ____ $4.00/ea	$____
53515	<20" w/rim ____ $5.00/ea	$____
____	Other - Write in fee type and description ____	$____
41266	Other - Write in fee type and description PCSoilTN	$105.63
	Circle Rebates/Donations	
63650	Recycle 10+lbs | 63651 Recycle Don.	-$1.00 | +$1.00
63660	Senior | 63661 Senior Don.	-$1.00 | +$1.00

CASH ☐ CHECK ☐ CC

TOTAL $325.34

18.74 - 15.66 = 3.08 x 105.63 = 325.34