



# Oregon

Tina Kotek, Governor

Department of Environmental Quality  
Northwest Region  
700 NE Multnomah Street, Suite 600  
Portland, Oregon 97232  
(503) 229-5263

August 18, 2025

Brainard Brauer  
Brauer 1820 LLC  
18876 S. Lyons Road  
Oregon City, Oregon 97045

RE: Partial No Further Action Determination  
for Brauer 1820 LLC Property in Clackamas County  
ECSI #6737

Dear Mr. Brauer:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information for the Brauer 1820 LLC property, including the closure report entitled, *Independent Cleanup Pathway Final Report*, dated June 2, 2025, which was submitted to DEQ by Succeed Environmental Consulting, LLC on your behalf. Contamination located on the Brauer 1820 LLC property appears to have originated from the Redland Store property located at 18151 S Redland Rd. in Oregon City. The Brauer 1820 LLC property consists of Tax Lots 3000 and 3800 on Tax Map 3S3E06B in Clackamas County. This determination applies only to the contamination located on the Brauer 1820 LLC property. This determination does not apply to the Redland Store property.

DEQ has determined that remedial actions to address environmental contamination at Brauer 1820 LLC is complete, and no further action is required. This determination is a result of our evaluation and judgment based on the DEQ regulations and the facts as we now understand them:

- The two lots have been vacant. The unimpacted eastern portion was developed with a residence in the 1950s. The western portion has always been undeveloped.
- The cause of gasoline-range impacts along western portion of the property appears to be from the upgradient Redland Store's underground storage tanks (USTs) and unregistered underground injection control (UIC) that received sewage and wastewater. The contamination is near a drainpipe discharging wastewater onto the property.
- Affected media are soil and groundwater.
- The Redland Store is directly west of the Brauer 1820 LLC property across S. Fischers Mill Rd. The Redland Store was assigned UST ID 10340. Two gasoline USTs were decommissioned in March 1990. A release was not reported during tanks decommissioning.
- Utility locates were performed on the Redland Store property and green dye was placed in the toilet. The dye test discovered wastewater directly discharged to the former UIC and on-site catch basin. The UIC is no longer in use on the site. One sample of residual sediment within the drainpipe was collected after the work was completed. No gasoline or volatile

organic compounds (VOCs) were detected. Up to 212 parts per million (ppm) of diesel were detected.

- The owner of the Redland Store completed investigations on its property and in the public right-of-way from September to November 2023. Test pits RS-TP-1 and RS-TP-2 and 13 borings (RS-B1 through RS-B6 and RS-B10 through RS-B16) were installed. Gasoline-range hydrocarbons were detected in soil from RS-B15 and RS-16 from 7 to 8 feet below ground surface (bgs).
- A test pit and two soil borings were advanced on the Redland Store property in September 2023. Soil samples collected from test pit TP-1 and borings B8 and B9 had elevated gasoline concentrations in soil 8 to 9 feet bgs. Impacted soil is located directly below the drainpipe. There were no impacts to the water sample collected from the catch basin.
- Petroleum impacted soil was excavated from the Brauer 1820 LLC property in September 2023. Approximately, 94 tons soil were removed and transported to Hillsboro Landfill. None of the confirmation soil samples for total petroleum hydrocarbons (TPH) and VOCs were above risk-based concentrations (RBCs) with the exception below a tree (discussed below). A confirmation water sample for TPH and benzene, toluene, ethylbenzene, xylenes, and naphthalene were below applicable RBCs.
- A small area was not removed due to tree roots. In this area, gasoline (619 ppm) and naphthalene (0.444 ppm) were detected above the leaching to groundwater exposure pathway.
- The Brauer 1820 LLC property is zoned rural commercial (RC). Use is expected to remain commercial, but the property remains vacant.
- Shallow groundwater is not currently used for beneficial purposes at the site. Public water is available from the Clackamas River Water.
- No impacted surface water was noted. A surface drainage is located approximately 200-250 feet southeast of the Subject Property.

Based on the available information, soil and groundwater conditions at Brauer 1820 LLC property are currently protective of public health and the environment in accordance with Oregon environmental cleanup law, ORS 465.200 et seq. 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 the Your DEQ Online (YDO) database to reflect this decision.

This letter only applies to the release(s) discussed above and to the Brauer 1820 LLC property. If any contaminated media is encountered in the future, it must be handled and disposed of in accordance with local, state and federal regulations.

A copy of the Succeed Environmental Consulting, LLC closure report supporting this No Further Action decision can be viewed at <https://ordeq.org/ECSI6737>. DEQ recommends keeping a copy of all documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Rob Hood at (503) 860-9661, or via email at [Robert.Hood@deq.oregon.gov](mailto:Robert.Hood@deq.oregon.gov).

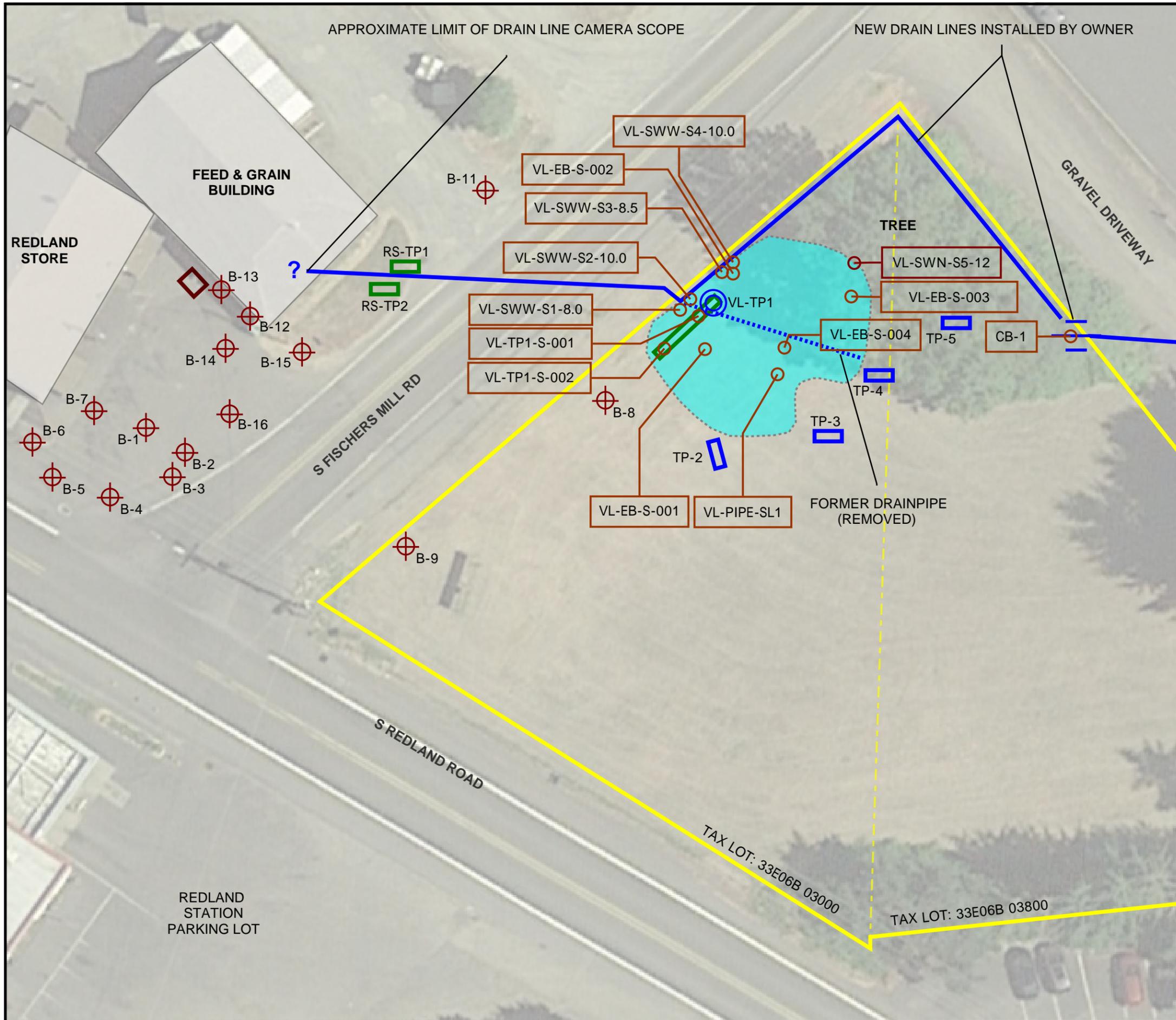
Sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin Parrett', with a long horizontal flourish extending to the right.

Kevin Parrett, Manager  
Northwest Region Cleanup Section

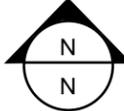
Attachments: -Figures1-3 and Tables 1 and 2

cc: Andrew Blake-Succeed Environmental Consulting, LLC  
ECSI #6737 File



LEGEND:

-  SUBJECT PROPERTY (SHOWN IN YELLOW)
-  DRAIN PIPE LOCATION (DASHED WHERE REMOVED)
-  POSSIBLE OFF-SITE UIC (FORMER WATER WELL)
-  ON-SITE CATCH BASIN
-  BORING LOCATION (MFA 2023)
-  TEST PIT LOCATION (MFA 2023)
-  REMEDIAL EXCAVATION LIMITS (2023)
-  CONFIRMATION SOIL SAMPLE LOCATION (MFA 2023)
-  VL-#
-  TEST PIT LOCATION (SEC 2025)
-  CONFIRMATION WATER SAMPLE LOCATION (SEC 2025)



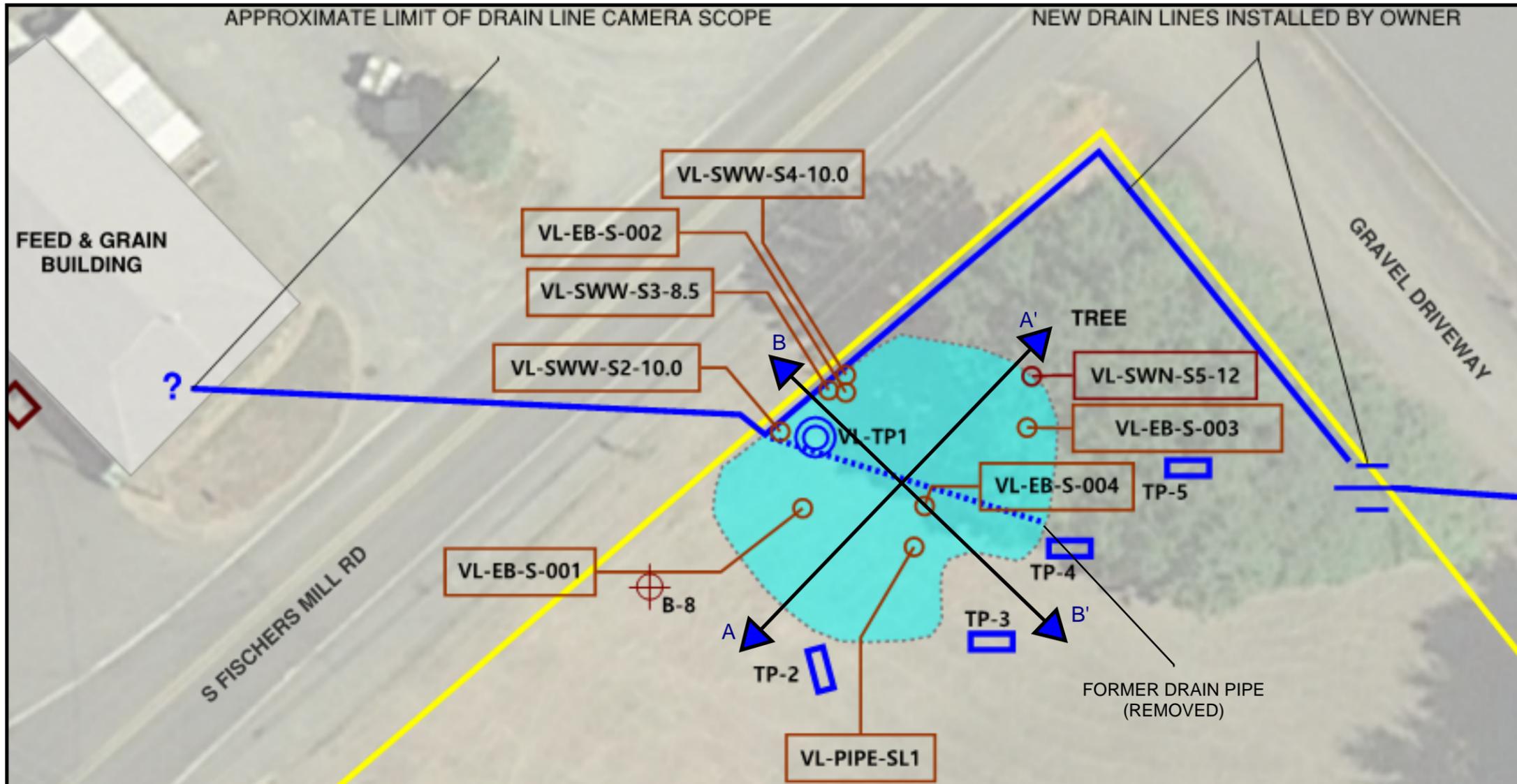
(APPROXIMATE SCALE IN FEET)



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SITE PLAN BASED ON OBSERVATIONS MADE BY SEC. MEASUREMENTS DERIVED FROM THIS FIGURE SHOULD BE CONSIDERED APPROXIMATE.

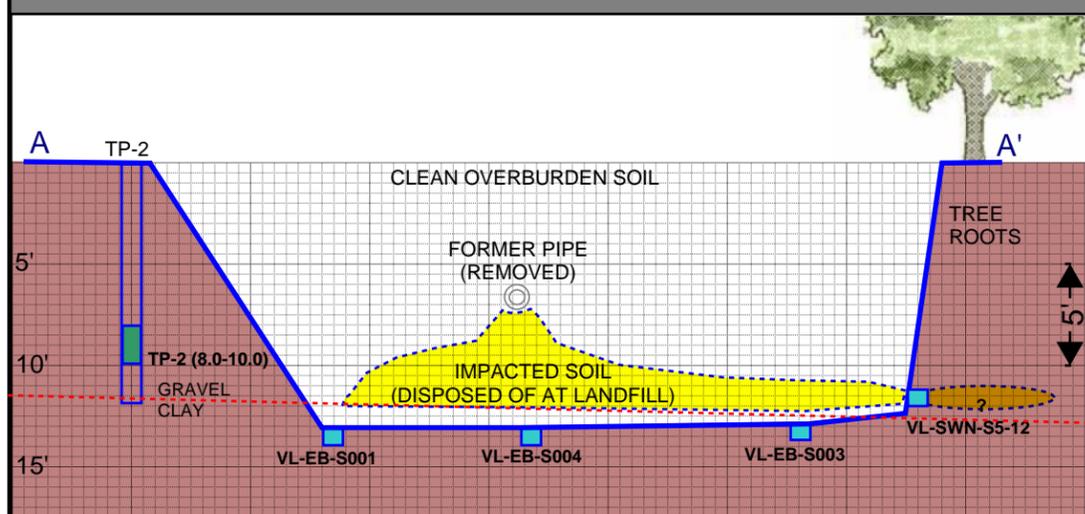
SITE PLAN: SITE LAYOUT AND ALL SAMPLE LOCATIONS BRAUER 1820 VACANT PROPERTY CLACKAMAS COUNTY, OREGON	REDLAND-2-01 JUNE 2025
	
FIGURE 2	



LEGEND:

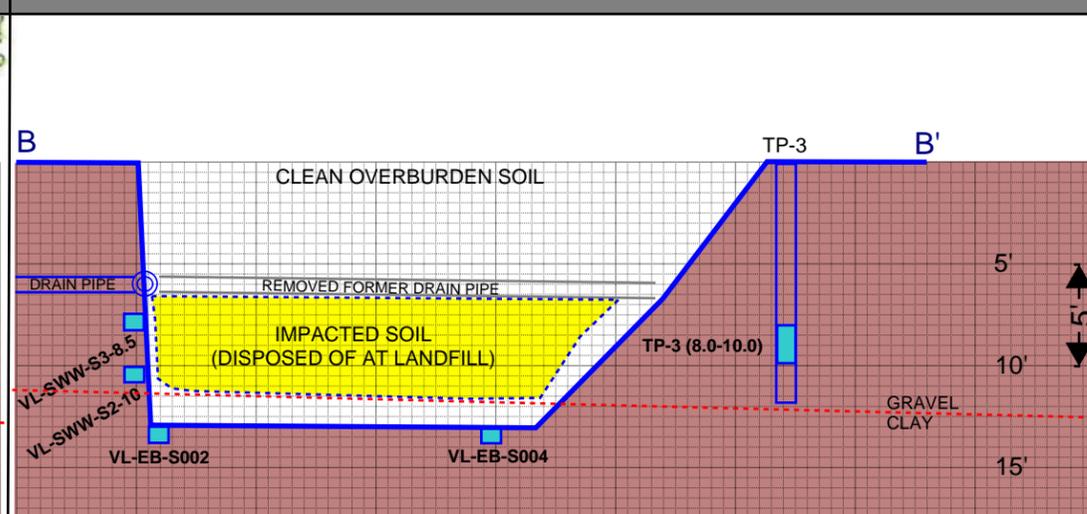
- SUBJECT PROPERTY (SHOWN IN YELLOW)
- DRAIN PIPE LOCATION (DASHED WHERE REMOVED)
- POSSIBLE OFF-SITE UIC (FORMER WATER WELL)
- ON-SITE CATCH BASIN
- REMEDIAL EXCAVATION LIMITS (2023)
- CONFIRMATION SOIL SAMPLE LOCATION (MFA 2023)
- TEST PIT LOCATION (SEC 2025)
- CONFIRMATION WATER SAMPLE LOCATION (SEC 2025)
- CROSS SECTION TRANSECT (SECTIONS SHOWN BELOW)

CROSS SECTION A-A'



GRAVEL & COBBLES (VARYING SAND, SILT, AND CLAY)  
CLAY CONTENT INCREASES AT APPROXIMATELY 12.0' BGS

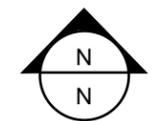
CROSS SECTION B-B'



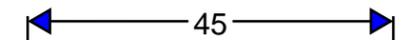
GRAVEL & COBBLES (VARYING SAND, SILT, AND CLAY)  
CLAY CONTENT INCREASES AT APPROXIMATELY 12.0' BGS

CROSS SECTION LEGEND:

- CROSS SECTION (APPROXIMATE)
- FORMER IMPACTED SOIL (REMOVED AND DISPOSED OF)
- CONFIRMATION SAMPLE



(APPROXIMATE SCALE IN FEET)



SITE PLAN BASED ON OBSERVATIONS MADE BY SEC. MEASUREMENTS DERIVED FROM THIS FIGURE SHOULD BE CONSIDERED APPROXIMATE.

EXCAVATION LIMITS AND SIMPLIFIED CROSS SECTIONS  
BRAUER 1820 VACANT PROPERTY  
CLACKAMAS COUNTY, OREGON

REDLAND-2-01  
JUNE 2025



FIGURE 3

**TABLE 1**  
**SOIL CHEMICAL ANALYTICAL RESULTS**  
**BRAUER 1820 VACANT PROPERTY CLEANUP**  
**S REDLAND ROAD & S FISHERS MILL ROAD**  
**CLACKAMAS COUNTY, OREGON**

Sample ID	Sample Depth (Feet BGS)	Date Collected	Collected By	Method	6020B	NWTPH-GxHCID	NWTPH-DxHCID	NWTPH-DxHCID	8260D	8260D	8260D	8260D	8260D			
				Analyte	TCLP LEAD	GASOLINE-RANGE	DIESEL-RANGE	OIL-RANGE	BENZENE	TOLUENE	ETHYLBENZENE	XYLENES, TOTAL	NAPHTHALENE			
				Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg			
<b>EXPLORATORY SOIL SAMPLES COLLECTED AT THE SUBJECT PROPERTY</b>																
VL-TP1-S-001 <sup>1</sup>	8.0 - 9.0	9/5/2023	MFA	Result	0.0250 U	<b>3,010</b>	<b>138</b>	55.1 U	0.0788 U	0.394 U	<b>0.331 J</b>	0.591 U	<b>1.21 J</b>			
VL-TP1-S-002 <sup>1</sup>	8.0 - 9.0	9/5/2023	MFA	Result	--	3.44 U	12.8 U	25.6 U	0.00688 U	0.0344 U	0.0172 U	0.0516 U	0.0688 U			
VL-B8-S-11.5	11.5	9/8/2023	MFA	Result	--	3.52 U	13.9 U	27.8 U	0.00704 U	0.0352 U	0.0176 U	0.0528 U	0.0704 U			
VL-B9-S-7	7.0	9/8/2023	MFA	Result	--	2.49 U	11.8 U	23.5 U	0.00497 U	0.0249 U	0.0124 U	0.0373 U	0.0497 U			
VL-PIPE-SL1 <sup>1</sup>	NA	9/25/2023	MFA	Result	--	4.05 U	<b>318</b>	25.7 U	0.00810 U	0.0405 U	0.0203 U	0.0608 U	0.0810 U			
<b>SOIL STOCKPILE CHARACTERIZATION SAMPLES COLLECTED AT THE SUBJECT PROPERTY PRIOR TO BACKFILL</b>																
VL-SP-CS-002	NA	9/19/2023	MFA	Result	--	2.74 U	11.6 U	<b>48.2 F-03</b>	0.00548 U	0.0274 U	0.0137 U	0.0411 U	0.0548 U			
VL-SP-CS-003	NA	9/19/2023	MFA	Result	--	3.18 U	<b>14.0 J</b>	<b>34.6 J</b>	0.00635 U	0.0318 U	0.0159 U	0.0476 U	0.0635 U			
<b>CONFIRMATION SOIL SAMPLES COLLECTED AT THE SUBJECT PROPERTY FOLLOWING REMEDIAL EXCAVATION</b>																
VL-SWW-S1-8.0	8.0	9/19/2023	MFA	Result	--	2.47 U	11.7 U	23.4 U	0.00494 U	0.0247 U	0.0124 U	0.0371 U	0.0494 U			
VL-SWW-S2-10.0	10.0	9/19/2023	MFA	Result	--	<b>12.9</b>	13.1 U	26.2 U	0.00642 U	0.0321 U	0.0160 U	0.0481 U	0.0642 U			
VL-SWW-S3-8.5	8.5	9/19/2023	MFA	Result	--	<b>20.1</b>	<b>212 F-13</b>	23.9 U	0.00514 U	0.0257 U	0.0129 U	0.0386 U	0.0514 U			
VL-SWW-S4-10.0	10.0	9/19/2023	MFA	Result	--	<b>14.7</b>	<b>35.7 F-13</b>	23.9 U	0.00820 U	0.0410 U	0.0205 U	0.0615 U	0.0820 U			
VL-EB-S-001	13.0 - 14.0	9/19/2023	MFA	Result	--	3.32 U	13.1 U	26.3 U	0.00665 U	0.0332 U	0.0166 U	0.0498 U	0.0665 U			
VL-EB-S-002	13.0 - 14.0	9/19/2023	MFA	Result	--	3.43 U	<b>13.4 J</b>	25.0 U	0.00685 U	0.0343 U	0.0171 U	0.0514 U	0.0685 U			
VL-EB-S-003	13.0 - 14.0	9/19/2023	MFA	Result	--	4.13 U	13.6 U	27.1 U	0.00826 U	0.0413 U	0.0206 U	0.0619 U	0.0826 U			
VL-EB-S-004	13.0 - 14.0	9/19/2023	MFA	Result	--	3.69 U	13.1 U	26.1 U	0.00738 U	0.0369 U	0.0185 U	0.0554 U	0.0738 U			
VL-SWN-S5-12.0	12.0	9/19/2023	MFA	Result	--	<b>619</b>	<b>27.7 F-13</b>	27.7 U	0.0138 U	0.0689 U	<b>0.303</b>	<b>0.749</b>	<b>0.444</b>			
TP-2 (8.0-10.0)	8.0 - 10.0	4/13/2025	SEC	Result	--	9.97 U	24.9 U	49.8 U	0.0199 U	0.0997 U	0.0499 U	0.150 U	0.199 U			
TP-3 (8.0-10.0)	8.0 - 10.0	4/13/2025	SEC	Result	--	11.4 U	25.4 U	50.7 U	0.0227 U	0.114 U	0.0568 U	0.170 U	0.227 U			
TP-4 (8.0-10.0)	8.0 - 10.0	4/13/2025	SEC	Result	--	10.2 U	24.4 U	48.9 U	0.0205 U	0.102 U	0.0512 U	0.154 U	0.205 U			
TP-5 (8.0-10.0)	8.0 - 10.0	4/13/2025	SEC	Result	--	8.00 U	23.2 U	46.4 U	0.0160 U	0.0800 U	0.0400 U	0.120 U	0.160 U			
<b>EXPLORATORY SAMPLES COLLECTED PROXIMATE THE UP-GRADIENT REDLAND STORE</b>																
RS-B1-S-8.5	8.5	9/8/2023	MFA	Result	--	<b>5.35 J</b>	<b>18.0 J</b>	27.6 U	0.00734 U	0.0367 U	0.0183 U	0.0550 U	0.0734 U			
RS-B2-S-8.5	8.5	9/8/2023	MFA	Result	--	2.77 U	<b>36.3</b>	<b>113</b>	0.00555 U	0.0277 U	0.0139 U	0.0416 U	0.0555 U			
RS-B3-S-12	12.0	9/8/2023	MFA	Result	--	3.56 U	13.1 U	26.1 U	0.00713 U	0.0356 U	0.0178 U	0.0534 U	0.0713 U			
RS-B4-S-8	8.0	9/8/2023	MFA	Result	--	2.74 U	12.2 U	24.4 U	0.00548 U	0.0274 U	0.0137 U	0.0411 U	0.0548 U			
RS-B5-S-6	6.0	9/8/2023	MFA	Result	--	2.73 U	<b>12.2 J</b>	<b>67.3</b>	0.00545 U	0.0273 U	0.0136 U	0.0409 U	0.0545 U			
RS-B6-S-8	8.0	9/8/2023	MFA	Result	--	3.47 U	13.5 U	27.0 U	0.00694 U	0.0347 U	0.0174 U	0.0521 U	0.0694 U			
RS-B10-SS-15.0	15.0	10/31/2024	MFA	Result	--	2.28 U	11.5 U	<b>244</b>	0.00457 U	0.0228 U	0.0114 U	0.0343 U	0.0914 U			
RS-B11-SS-16.0	16.0	10/31/2024	MFA	Result	--	3.49 U	13.6 U	27.1 U	0.00699 U	0.0349 U	0.0175 U	0.0524 U	0.140 U			
RS-B12-SS-12.5	12.5	10/31/2024	MFA	Result	--	6.49 U	16.5 U	32.9 U	0.0130 U	0.0649 U	0.0324 U	0.0973 U	0.260 U			
RS-B13-SS-12.5	12.5	10/31/2024	MFA	Result	--	4.72 U	15.9 U	31.8 U	0.00944 U	0.0472 U	0.0236 U	0.0708 U	0.189 U			
RS-B14-SS-12.0	12.0	10/31/2024	MFA	Result	--	4.85 U	15.9 U	31.8 U	0.00969 U	0.0485 U	0.0242 U	0.0727 U	0.194 U			
RS-B15-SS-8.0	8.0	10/31/2024	MFA	Result	--	<b>143</b>	14.0 U	28.1 U	0.00737 U	0.0368 U	0.0184 U	0.0553 U	0.147 U			
RS-B16-SS-7.0	7.0	10/31/2024	MFA	Result	--	<b>190</b>	<b>60.8</b>	25.4 U	0.00597 U	0.0299 U	0.0149 U	0.0448 U	0.119 U			
RSTP1-SS-8.0	8.0	10/31/2024	MFA	Result	--	3.00 U	12.2 U	24.4 U	0.00601 U	0.0300 U	0.0150 U	0.0451 U	0.120 U			
RSTP1-SS-10.0	10.0	10/31/2024	MFA	Result	--	3.50 U	14.0 U	28.0 U	0.00700 U	0.035 U	0.0175 U	0.0525 U	0.140 U			
RS-TP2-SS-10.5	10.5	11/10/2023	MFA	Result	--	4.43 U	13.2 U	26.4 U	0.00885 U	0.00443 U	0.0221 U	0.0664 U	0.177 U			
RS-TP2-SS-11.5	11.5	11/10/2023	MFA	Result	--	4.27 U	14.4 U	28.8 U	0.00855 U	0.00427 U	0.0214 U	0.0641 U	0.171 U			
RS-TP2-SS-11.7	11.7	11/10/2023	MFA	Result	--	4.33 U	15.0 U	29.9 U	0.00866 U	0.00433 U	0.0216 U	0.0649 U	0.173 U			
DEQ Soil Ingestion, Dermal Contact, & Inhalation RBCs	Occupational				--	20,000	14,000	--	37	88,000	150	25,000	23			
	Construction Worker				--	9,700	4,600	--	380	28,000	1,700	20,000	580			
	Excavation Worker				--	>Max	>Max	--	11,000	770,000	49,000	560,000	16,000			
DEQ Volatilization of Soil To Outdoor Air RBCs				Occupational				--	69,000	>Max	--	50	>Csat	160	>Csat	83
DEQ Soil Leaching to Groundwater RBCs				Occupational				--	130	>Max	--	0.1	490	0.9	100	0.34

**TABLE 1**  
**SOIL CHEMICAL ANALYTICAL RESULTS**  
**BRAUER 1820 VACANT PROPERTY CLEANUP**  
**S REDLAND ROAD & S FISHERS MILL ROAD**  
**CLACKAMAS COUNTY, OREGON**

Sample ID	Sample Depth (Feet BGS)	Date Collected	Collected By	Method	6020B	NWTPH- GxHCID	NWTPH- DxHCID	NWTPH- DxHCID	8260D	8260D	8260D	8260D	8260D
				Analyte	TCLP LEAD	GASOLINE-RANGE	DIESEL-RANGE	OIL-RANGE	BENZENE	TOLUENE	ETHYLBENZENE	XYLENES, TOTAL	NAPHTHALENE
Units				mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
DEQ CFSLs				--	31	1,100	--	0.023	23	0.22	1.4	0.077	

Notes:

- 1. Soil represented by this sample was excavated and disposed of at the Hillsboro Landfill.
- : Not Analyzed / Not Applicable
- U: Not Detected at a Concentration Greater Than Corresponding RDL (Noted)
- Shading Indicates Concentration Exceeding Applicable RBC
- F-13: Chromatographic Pattern Does Not Resemble the Fuel Standard Used for Quantitation.
- J: Estimated Result. Result Detected Below the Lowest Point of the Calibration Curve, but Above the MDL.
- Bolding Indicates Analyte Detection.
- DEQ RBCs dated August 2023.
- DEQ CFSLs dated February 2019.
- >Max: Does not pose a risk in this scenario.
- >Csat: RBC Exceeds the limit of three-phase equilibrium partitioning.

**TABLE 2**  
**GROUNDWATER CHEMICAL ANALYTICAL RESULTS**  
**BRAUER 1820 VACANT PROPERTY CLEANUP**  
**S REDLAND ROAD & S FISHERS MILL ROAD**  
**CLACKAMAS COUNTY, OREGON**

Sample ID	Sample Location	Date Collected	Collected By	Method	C.M.P.	NWTPH-Gx HCID	NWTPH-Dx HCID	NWTPH-Dx HCID	8260D	8260D	8260D	8260D	8260D
				Analyte	E. coli	GASOLINE-RANGE	DIESEL-RANGE	OIL-RANGE	BENZENE	TOLUENE	ETHYLBENZENE	XYLENES, TOTAL	NAPHTHALENE
				Units	MPN/100 mL	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L
<b>WATER SAMPLES COLLECTED AT THE SUBJECT PROPERTY</b>													
CB-1	On-Site Catch Basin	9/5/2023	MFA	Result	<b>1,730</b>	50.0 U	99.0 U	198 U	0.100 U	0.500 U	0.250 U	0.750 U	2.00 U
VL-GW-001	On-Site Catch Basin	4/10/2024	MFA	Result	<b>4.10</b>	--	--	--	--	--	--	--	--
TP-1	On-Site TP-1	4/13/2025	SEC	Result	--	100 U	<b>340</b>	392 U	0.200 U	1.00 U	0.500 U	1.5 U	5.00 U
<b>WATER SAMPLES COLLECTED IN THE SUBJECT PROPERTY VICINITY</b>													
RG-GW-001	Redland Station Well	4/10/2024	MFA	Result	1.00 U	--	--	--	--	--	--	--	--
DB-GW-001	Dan Brauer's Well	4/10/2024	MFA	Result	1.00 U	--	--	--	--	--	--	--	--
RD-GW-001	Dental Office Well	4/10/2024	MFA	Result	1.00 U	--	--	--	--	--	--	--	--
RS-TP1-GW-9.5	ROW Test Pit 1	10/31/2023	MFA	Result	<b>1,550</b>	50.0 U	111 U	222 U	0.100 U	0.500 U	0.250 U	0.750 U	2.50 U
RS-TP2-GW-12.5	ROW Test Pit 2	11/10/2023	MFA	Result	--	50.0 U	115 U	230 U	0.100 U	0.500 U	0.250 U	0.750 U	2.50 U
RS-TP2-GW-ecoli		11/10/2023	MFA	Result	<b>121</b>	--	--	--	--	--	--	--	--
DEQ Ingestion, Dermal Contact, & Inhalation From Tapwater RBCs			Occupational	--	450	430	--	2.1	6,300	6.4	830	0.72	
DEQ Volatilization to Outdoor Air RBCs			Occupational	--	>S	>S	--	14,000	>S	43,000	>S	16,000	
DEQ Chronic Vapor Intrusion into Buildings RBCs			Commercial	--	520	1,700	--	12	150,000	31	3,300	50	
DEQ Acute Vapor Intrusion into Buildings RBCs			Commercial	--	--	--	--	650	160,000	420,000	200,000	83,000	
DEQ Groundwater in Excavation RBCs			Const. & Excavation Worker	--	14,000	>S	--	1,800	220,000	4,500	23,000	500	

Notes:

--: Not Analyzed / Not Applicable

U: Not Detected at a Concentration Greater Than Corresponding RDL (Noted)

Shading Indicates Concentration Exceeding Corresponding RBC

Bolding Indicates Analyte Detection.

DEQ RBCs dated August 2023. Vapor Intrusion RBCs dated March 2024.

>S: RBC Exceeds the solubility limit.