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September 12, 2025

Mr. Dominic Nicandri, Director of Facilities
Gordon Truck Centers Inc.
277 Stewart Road SW
Pacific, Washington 98047

RE: Technical Memorandum Describing the Groundwater Beneficial Use Survey for the Pacific Truck Centers Property at 2343 Biddle Road in Medford, Oregon; LUST Facility 15-20-0238

This technical memorandum prepared by Alpine Environmental Consultants, LLC (AEC) describes the results of a Groundwater Beneficial Use Survey completed for the Pacific Truck Centers Property addressed as 2343 Biddle Road in Medford, Oregon (the Site). The Site occupies approximately 4.31 acres of developed land. Working with oversight from the Oregon Department of Environmental Quality, seven underground storage tanks (USTs) were decommissioned by removal at the Site in February 2020. Due to an identified petroleum release, a Leaking Underground Storage Tank (LUST) incident number was allocated to the Site, specifically LUST Facility 15-20-0238. The location of the Site and surrounding areas are illustrated in **Figure 1** and **Figure 2**.

Based on residual petroleum hydrocarbon contamination to soil and groundwater at the Site, DEQ requested supplemental characterization of soil and groundwater to better document the extent of contamination before DEQ could issue a No Further Action (NFA) determination for the Site and close LUST file 15-20-0238. AEC completed a Supplemental LUST Investigation at the Site consistent with a DEQ-approved work plan in August 2020 that involved the collection of soil and groundwater samples from 13 borings. The results of this investigation are documented in AEC's Supplemental LUST Investigation Report for Facility 15-20-0238 dated April 8, 2021.

Based on the analytical results, the reported concentrations of total petroleum hydrocarbons in the diesel range (TPD-d) in groundwater samples GW-SB9 through GW-SB13 exceeded the generic risk-based concentration (RBC) for the *ingestion and inhalation from tapwater exposure pathway* for occupational receptors. These groundwater samples were collected near the tank pit. The inferred groundwater flow direction at the Site is to the west-northwest towards Bear Creek. The reported concentration of TPH-d in groundwater sample GW-SB9 was 10,500

micrograms per liter ($\mu\text{g/L}$), while the reported concentration of TPH-d in groundwater sample GW-SB13 was 560 $\mu\text{g/L}$. Boring SB-13 is located approximately 50 feet west of boring SB-9 so the analytical results demonstrate a significant amount of natural attenuation to the west of the tank pit. Additional details are available in the Supplemental LUST Investigation Report.

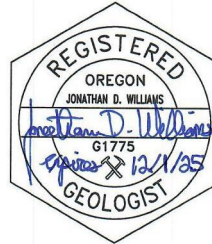
While the Site is provided with municipal water, DEQ personnel were concerned that residual Site-related petroleum hydrocarbon impacts to groundwater could potentially impact human receptors at proximal properties. To evaluate this concern AEC completed a Groundwater Beneficial Use Survey by reviewing the Oregon Water Resources Department (WRD) on-line database in order to acquire information regarding water supply wells within $\frac{1}{4}$ -mile radius of the Site. For the purposes of this memorandum, water supply wells are defined as those wells used to provide water for domestic, municipal, irrigation, and/or industrial use. The WRD database was accessed on July 3, 2024. AEC reviewed the well logs in Township 37 South, Range 1 West, and Section 18 and Township 37S, Range 2 West, and Section 13. Only one well log for water supply wells was identified within a $\frac{1}{4}$ -mile radius of the Site within these two sections.

The single water supply well within a $\frac{1}{4}$ -mile radius of the Site is identified as an irrigation well with an address of 2813 Biddle Road in Medford, Oregon. The well log for this well is identified by WRD as JACK12915 and a copy of the well log is included in **Attachment A**. This well is located approximately $\frac{1}{4}$ -mile north of the Site. Because the inferred horizontal hydraulic gradient is to the west-northwest towards Bear Creek, the well to the north is inferred to be hydraulically cross-gradient of the Site. Accordingly, it is not reasonable and likely that residual petroleum hydrocarbon impacts to groundwater near the tank pit at the Site will generate unacceptable health risks to human receptors using water from the well to the north. Furthermore, it is not reasonable and likely that additional water supply wells will be drilled at or near the Site in the future because the Site and surrounding area are within the service area of Medford Water.

This technical memorandum was prepared by Jonathan Williams. Mr. Williams received a Bachelor of Science degree in Geology, with honors, from Duke University in 1987. He has 30 years of experience working with geological, hydrogeological, groundwater modeling, and environmental projects. Mr. Williams has been a Registered Geologist in the State of Oregon since 1996.

Please feel free to contact Jonathan Williams at 541-944-4685 or jwilliams@alpine-env-llc.com if you have any questions about this technical memorandum.

ALPINE ENVIRONMENTAL CONSULTANTS, LLC



Jonathan D. Williams, R.G.
Senior Hydrogeologist, Principal

CC: Tina Elayer, DEQ

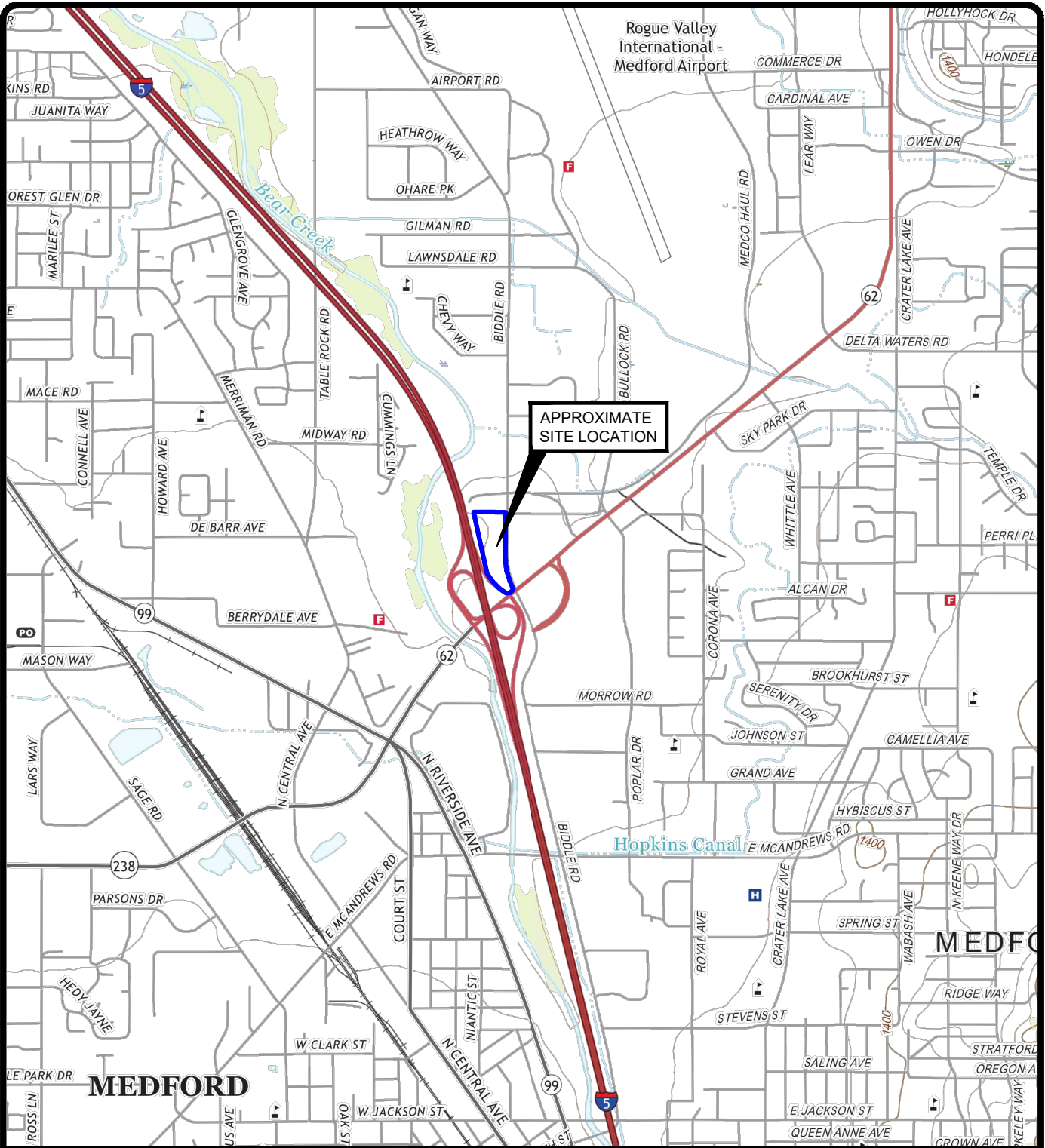
Attachments:

Figure 1 – Site Location Map, Groundwater Beneficial Use Survey

Figure 2 – Site Map, Groundwater Beneficial Use Survey

Attachment A – Well Log for JACK12915


FIGURES

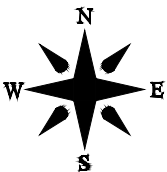


SOURCE: U.S.G.S. 7.5 MINUTE TOPOGRAPHIC QUADRANGLE
 MEDFORD EAST, OR AND MEDFORD WEST, OR (2017)



LEGEND

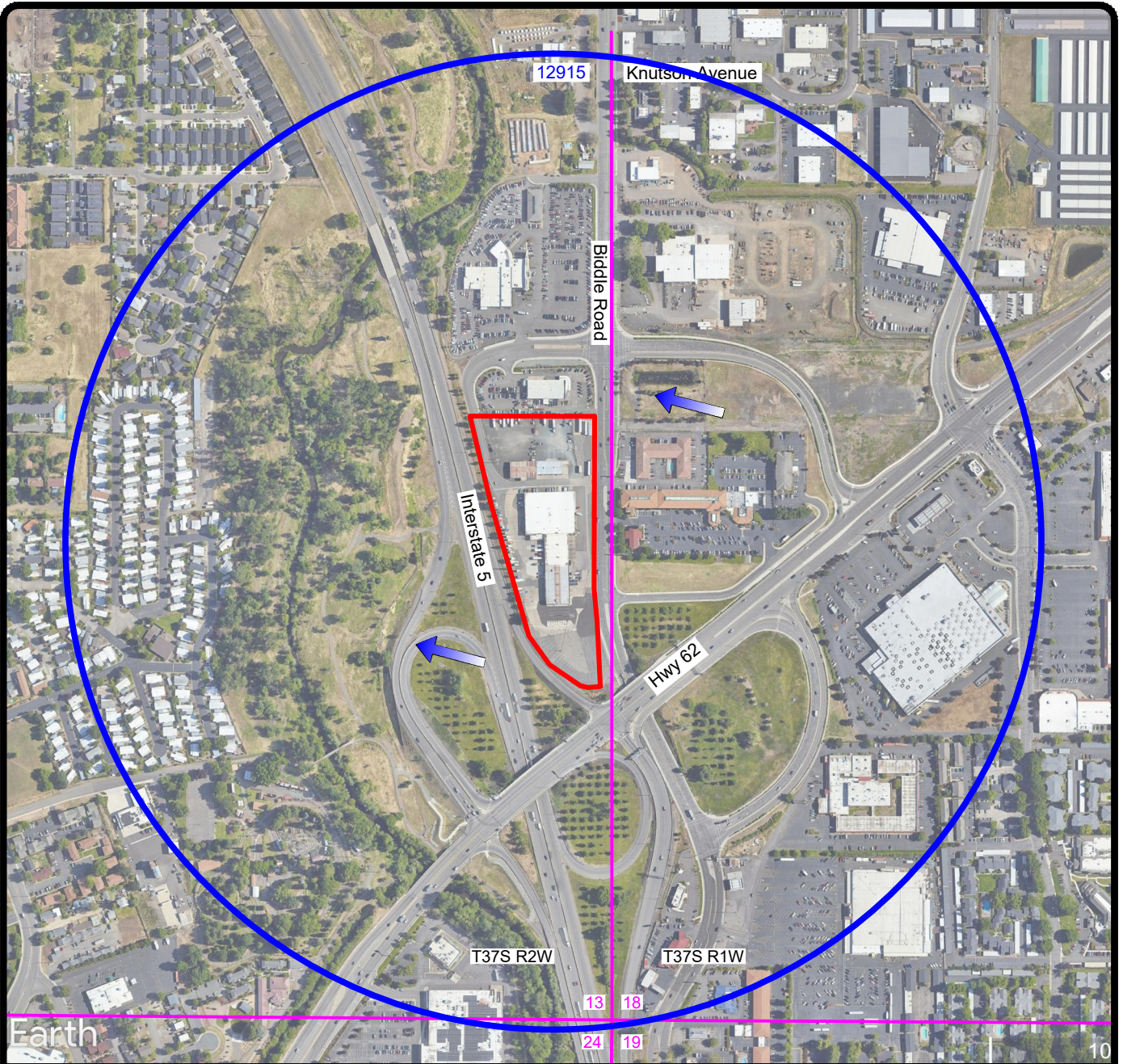
 Approximate Site Boundary



DATE: 7/3/24




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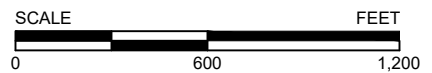
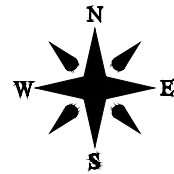
Figure 1
 Site Location Map
 Groundwater Beneficial Use Survey
 Pacific Truck Centers
 2343 Biddle Road
 Medford, Oregon



SOURCE: GOOGLE EARTH (2022)

LEGEND

- 12915 Domestic, Industrial or Irrigation Water Well Log Number (Approximate Location)
-  1/4-Mile Radius from Site Location
-  Inferred Groundwater Flow Direction
-  Section Line and Designation




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DATE: 7/3/24	DRAWN BY: SRM
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Figure 2
 Site Map
 Groundwater Beneficial Use Survey
 Pacific Truck Centers
 2343 Biddle Road
 Medford, Oregon

ATTACHMENT A

Well Log for JACK12915

RECEIVED

JACK 12915 375/2W/13aa (START CARD) # 6674

STATE OF OREGON WATER WELL REPORT (as required by ORS 537.785)

MAY 24 1989

(1) OWNER:

Name KENNETH Searley Address 2813 Biddle Rd. City Medford State ORE Zip 97504

Well Number WATER RESOURCES DEPT SALEM, OREGON JACKSON

(9) LOCATION OF WELL by legal description:

Township 37 N, Range 2 W, Section 13 AA, Tax Lot 103, Street Address of Well 2813 Biddle Rd. Medford, ORE

(2) TYPE OF WORK:

New Well Deepen Recondition Abandon

(3) DRILL METHOD

Rotary Air Rotary Mud Cable Other

(4) PROPOSED USE:

Domestic Community Industrial Irrigation Thermal Injection Other

(5) BORE HOLE CONSTRUCTION:

Special Construction approval Yes No Depth of Completed Well 190 ft. Explosives used

Table with columns: HOLE Diameter, SEAL Material, Amount sacks or pounds

How was seal placed: Method A B C D E

Backfill placed from ft. to ft. Material Gravel placed from ft. to ft. Size of gravel

(6) CASING/LINER:

Table with columns: Diameter, From, To, Gauge, Steel, Plastic, Welded, Threaded

Final location of shoe(s)

(7) PERFORATIONS/SCREENS:

Table with columns: From, To, Slot size, Number, Diameter, Tele/pipe size, Casing, Liner

(8) WELL TESTS: Minimum testing time is 1 hour

Table with columns: Pump, Bailer, Air, Flowing Artesian, Yield gal/min, Drawdown, Drill stem at, Time

Temperature of water 53 Depth Artesian Flow Found Was a water analysis done? Did any strata contain water not suitable for intended use? Depth of strata:

(10) STATIC WATER LEVEL:

7 ft. below land surface. Date 16 MAY 89

(11) WATER BEARING ZONES:

Table with columns: From, To, Estimated Flow Rate, SWL

(12) WELL LOG:

Table with columns: Material, From, To, SWL

Date started 28 APRIL Completed 16 MAY 89

(unbonded) Water Well Constructor Certification:

I certify that the work I performed on the construction, alteration, or abandonment of this well is in compliance with Oregon well construction standards.

Signed Date WWC Number

(bonded) Water Well Constructor Certification:

I accept responsibility for the construction, alteration, or abandonment work performed on this well during the construction dates reported above.

Signed Date WWC Number