

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF LINN

STATE OF OREGON, ex rel. , LEAH
FELDON, DIRECTOR OF DEPARTMENT
OF ENVIRONMENTAL QUALITY,

Plaintiff,

v.

MAIN BLOCK INVESTMENTS, HUI, INC.,
and WILLIAM A. RAUCH,

Defendants.

Case No. 25CV16122

CERTIFICATION OF COMPLETION

ORS 20.140 - State fees deferred at filing

1. Findings

A. On March 20, 2026, Linn County Circuit Court Judge McHill approved a Consent Judgment submitted by Plaintiff Oregon Department of Environmental Quality (DEQ) and Defendants Main Block Investments, HUI, Inc., and William A. Rauch, (“Defendants”), (Collectively, the “Parties”), in the Circuit Court of the State of Oregon for Linn County, Case No. 25CV16122. The Consent Judgment required that the Parties perform remedial actions to address contaminated soil and groundwater at the former Union Cleaners II site (the Site) in Lebanon.

B. The Parties were to Pay DEQ \$500,000 in full and final settlement of DEQ’s claims against Defendants in connection with the Lebanon Areawide Groundwater site.

C. Perform the following remedial actions:

(a) Institute institutional and engineering controls, including site restrictions, and implementation of the DEQ approved Contaminated Media Management Plan.

(b) Record site restrictions in the form of an Easement and Equitable Servitudes restricting groundwater use, requiring vapor resistant construction for new buildings constructed at the Site, adhering to the CMMP, and adhering to the Operation and Maintenance Plan for the existing sub-slab depressurization system.

D. Payment of the \$500,000 was received at DEQ as of May 22, 2025.

E. The EES was recorded on the Site property on May 22, 2025.

F. On July 1, 2025 DEQ provided public notice and opportunity to comment on this proposed Certification of Completion in accordance with ORS 465.320 and 465.325(10)(b). Copies of the remedial action reports completed for the project were available to review at DEQ's project website and the entire project file was available at DEQ's Western Region office in Eugene.

A public notice announcing the 30-day comment period was published on July 1, 2025 in the Albany Democrat-Herald newspaper. Notice was also published on DEQ's website and in the July 2025 Secretary of State Bulletin.

G. DEQ did not receive any comments on the proposed Certificate of Completion.

H. Based on the reports and other information, and payment submitted by the Parties, and DEQ's inspection and oversight of activities, DEQ finds that the Parties have satisfactorily completed the actions required under the Consent Judgment.

2. Conclusions

A. Defendants Main Block Investments, HUI, Inc., and William A. Rauch have satisfactorily completed actions required at the Site and paid the amount required by the Consent Judgment and no further action is required to remediate the Site.

B. Ongoing inspection and maintenance activities are required by the 2020 Easement and Equitable Servitudes, which are described in Section 1.C, above.

3. Conditions

A. This Certification of Completion applies only to the actions that were required under the Consent Judgment.

1 B. DEQ's determination that no further action is required at the Site may be withdrawn
2 upon discovery of new information showing that public health, safety, and welfare or the
3 environment are not being protected.

4 C. DEQ does not, by this Certification, assume liability for any claim arising from acts or
5 omissions of Defendants Main Block Investments, HUI, Inc., and William A. Rauch or its officers,
6 employees, agents, successors, subsidiaries, or assigns relating to actions pursuant to the Consent
7 Judgment.

8 **4. Notice**

9 This order constitutes Certification of Completion under ORS 465.325(10), and may be
10 appealed by any aggrieved person in accordance with ORS 465.325(10)(c).

11
12 **Issued By:**

13 State of Oregon
14 Department of Environmental Quality

State of Oregon
Department of Justice

15 By: *Ruth Hyde*
Ruth Hyde (Aug 21, 2025 11:08:31 PDT)
16 Ruth Hyde
Western Region Administrator

By: *Gary Vrooman*
17 Gary Vrooman, OSB No. 075832
Assistant Attorney General

18 08/21/2025

08/21/2025

19 Date

Date

CERTIFICATE OF SERVICE

I certify that on August 21, 2025, I served a true copy of the foregoing of CERTIFICATE OF COMPLETION in MAIN BLOCK INVESTMENTS, HUI, INC. and WILLIAM A. RAUCH, upon the party hereto by the method indicated below, and addressed to the following:

Christopher R. Hermann
Carl Mackie Power Ross LLP
300 Oswego Pointe Drive, Suite 103
Lake Oswego, OR 97034
Attorney for Defendants

☐ Hand Delivery
☒ Mail Delivery
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CERTIFICATE OF SERVICE
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