

Date: November 3, 2025

To: FILE

Through: Brad Shultz, Western Region Program Manager
and Bruce Scherzinger, Lead Worker

From: Sarah Kingery
Western Region

Subject: Former Delon Mazda, LUST 24-15-0202; Staff Memorandum in support of a
Conditional No Further Action determination

This document presents the basis for the Oregon Department of Environmental Quality's (DEQ's) recommended No Further Action (NFA) determination for the Former Delon Mazda, in Salem. As discussed in this report, contaminant concentrations in soil and groundwater are below acceptable risk levels.

The proposed NFA determination meets the requirements of Oregon Administrative Rules Chapter 340, Division 122, Sections 0205 to 0360; and ORS 465.200 through 465.455.

The proposal is based on information documented in the administrative record for this site. A list of the key documents in the administrative is presented at the end of this report.

1. BACKGROUND

Site location.

The site's location can be described as follows:

- Address: 4403 Commercial Street SE, Salem, Marion County, Oregon.
- Latitude 44.8899 North, longitude -123.0333 West
- Tax lots 03400 and 03500, Township 8 south, Range 3 west, Section 10

Site setting.

The site is 2.06 acres in size. It is paved with sidewalks and landscaping around a commercial shopping center. The center is comprised of two commercial retail buildings that border the north and east side of the property (tax lot 03500). A fenced garbage enclosure is located on the southwest corner of the property (tax lot 03400).

The property is bordered by Hilfiker Lane SE to the north, Commercial Street SE to the east, and Sunnyside Road SE to the west. Properties south of the site are occupied by more commercial shopping. The site and adjacent property are zoned mixed use.

Physical setting.

The site is located at an elevation of approximately 400 feet above mean sea level. Soils beneath the site are reddish and orange-brown silt with clay overlying basalt bedrock based on observations in borings. Depth to basalt ranged from 17 feet to 42 feet below ground surface (bgs) on the western property boundary. Regional groundwater flow is towards the northwest. Groundwater beneath the site appears to be perched above the basalt and was encountered in borings at depths ranging from 11.5 to 22 feet bgs. There is no surface water onsite. The nearest surface water is a series of gravel pit ponds 2.5 miles to the east.

Site history.

The site was first developed for commercial purposes in 1954 and consisted of two addresses (4403 Commercial Street SE and 4516 Sunnyside Road SE). Automobile sales and repair occurred at the site from 1961 until 2013 at the Commercial Street address. Historical records indicate that the Sunnyside Road address was developed around the same time and was occupied by an automobile service and repair business from 1980 until 2003. The site was redeveloped in 2015 into the current commercial shopping center.

2. BENEFICIAL LAND AND WATER USE DETERMINATIONS

Land use.

The site and property to the south are used as commercial shopping. The site is zoned Mixed-Use (MU-III) which allows for a variety of retail and office uses, commercial services, and multiple family residential uses. The site and adjacent property provide shopping to the surrounding residential community and use is not expected to change.

Groundwater use.

Groundwater was encountered beneath the site at depths ranging from 11.5 to 22 feet bgs. Groundwater flow is to the northwest. Water is supplied to the site and surrounding area by the City of Salem. Water supplies come from a mix of surface water bodies and wells. Shallow groundwater beneath the site is currently not being used.

Surface water use.

There is no surface water onsite. The nearest surface water is a series of gravel pit ponds 2.5 miles to the east. The Willamette River is 5 miles west of the site. Stormwater on site is managed by a storm drain located on the west side of the site that connects to the city stormwater system.

3. INVESTIGATION AND CLEANUP WORK

The areas of concern identified at the site were the former 1,000-gallon underground storage tank (UST) and in-ground hydraulic hoists. The UST was decommissioned in 1990 during which time a release of gasoline to the soil was reported and a leaking underground storage tank (LUST) file was opened with DEQ (LUST 24-90-4186). A no further action (NFA) letter was issued by DEQ on January 29, 1992. Groundwater was not evaluated as part of the 1992 investigation and closure.

Additional investigations at the site began in 1992 as part of a property redevelopment. The purpose of the investigations was to investigate total petroleum hydrocarbons (TPH) left in soil and to assess groundwater conditions. Nineteen borings were advanced onsite, and twenty-one soil samples were collected in the vicinity of the nine hoists and the former UST. Eight groundwater grab samples were collected from specific borings. No permanent monitoring wells were constructed onsite.

Soil samples were analyzed for gasoline-range hydrocarbons by method NWTPH-Gx and volatile organic compounds (VOCs) by EPA method 8260B. Soil samples collected around the former hoists were analyzed for diesel and oil-range hydrocarbons by NWTPH-Dx. Select samples were analyzed for polychlorinated biphenyls (PCBs) by EPA method 8082A, polycyclic aromatic hydrocarbons (PAHs) by EPA method 8270D SIM and benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA method 8260B.

Groundwater samples were analyzed for gasoline-range and diesel-range hydrocarbons by method NWTPH-Gx and NWTPH-Dx, VOCs by EPA method 8260B, and PAHs by EPA method 8270D SIM.

Nature and extent of contamination.

Contaminants of interest at the site are gasoline, diesel, and oil-range hydrocarbons and VOCs in soil and groundwater. Two zones of soil contaminated with diesel-range hydrocarbons are present at depths of 9 to 10 feet bgs. One zone is located in the southwest corner of the site (Tax lot 03400) where concentrations range from 216 to 1,250 mg/kg. A second zone of diesel and oil-range soil contamination is in the center of the site in the vicinity of the former hoists (Tax lot 03500). Concentrations range from 1,096 to 29,500 mg/kg. Soil samples collected at depths of 15 and 22 feet bgs south of the former UST excavation contained gasoline-range hydrocarbons and low levels of VOCs. Gasoline concentrations ranged from 94.4 to 388 mg/kg. Specific VOCs detected were benzene, ethylbenzene, total xylenes, 1,2-dichloroethane (EDC), naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, isopropylbenzene, and 1,4-dichlorobenzene. Soil contamination in these areas is limited, at depth, and does not extend offsite.

Groundwater samples were obtained from the northern and southwest portions of the site. Samples collected on the north, west, and east property lines did not detect gasoline-range hydrocarbons or VOCs indicating that groundwater contamination related to the former UST does not extend offsite. However, gasoline-range hydrocarbons were detected in groundwater grab samples obtained from the vicinity of the former UST at concentrations ranging from 3,120 to 1,020 µg/L. Low concentrations of VOCs were also detected, specifically benzene, ethylbenzene, total xylenes, naphthalene, 1,4-dichlorobenzene, 1,2-dichlorobenzene, n-butylbenzene, sec-butylbenzene, isopropylbenzene, 4-isopropyl toluene, n-propylbenzene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and chloroform.

4. RISK EVALUATION

Conceptual site model.

The source of contamination at this site were the former gasoline UST and the hoists. Secondary sources include soil and groundwater contamination.

Pathways by which this contamination could reach human receptors include soil inhalation, ingestion, and dermal contact, leaching to groundwater, and vapor intrusion. There are no ecological receptors at this site. The human receptors currently and reasonably likely affected are occupational, construction, and excavation workers.

To evaluate human exposure to residual chemical contamination requires an assessment of the type and extent of that exposure. This is based on current and reasonably likely future site use. DEQ publishes risk-based concentrations (RBCs) for contaminants commonly encountered, for different types of exposure scenarios. These RBCs are conservative estimates of protective levels of contaminants in soil, groundwater and air. Table 1 shows potential exposure pathways and receptors for this site. Based on this, applicable RBCs are identified and used for risk screening.

Table 1. Identification of applicable RBCs, based on pertinent pathways and receptors

| | Pathway | Receptor | | | Comments |
|-------------|---|--------------------------------------|----------------------|------------------|---|
| | | | Is pathway complete? | Is RBC Exceeded? | |
| Soil | Ingestion, Dermal Contact, and Inhalation | Residential and/or Urban Residential | No | NA | Soil contamination is at depth |
| | | Occupational | No | NA | |
| | | Construction Worker | Yes | No | |
| | | Excavation Worker | Yes | No | |
| | Volatilization to Outdoor Air | Residential and/or Urban residential | No | NA | |
| | | Occupational | Yes | No | |
| | Leaching to Groundwater | Residential and/or Urban residential | No | NA | NOTE 1 Water is supplied by local municipality. Currently there is no beneficial use of shallow groundwater. |
| | | Occupational | No | NA | |
| Groundwater | Ingestion & Inhalation from Tap Water | Residential and/or Urban residential | No | NA | Water is supplied by local municipality. Currently there is no beneficial use of shallow groundwater. |
| | | Occupational | No | NA | |
| | Vapor Intrusion into Buildings | Residential | No | NA | Vertical separation between source and receptor is greater than 6 feet therefore this pathway is incomplete. |
| | | Commercial | No | Yes | |

| | | | | | |
|------------|---------------------------|-----------------------------|-----|----|--|
| | Groundwater in Excavation | Occupational | Yes | No | |
| Ecological | | Terrestrial & Surface Water | No | NA | |

Notes:

1. Groundwater is not currently used for drinking. This pathway is therefore not considered, in accordance with Section B.3.2.4 of DEQ’s RBDM guidance.

Contaminant concentrations.

Petroleum contaminated soil remains at depths of 9 feet bgs and greater at specific locations around the site: west of the former gasoline UST, beneath former hoist locations in the middle of the site, and in the southwest corner of the site. Concentrations in soil range from 94.4 to 388 mg/kg gasoline, 338 to 1,250 mg/kg diesel, and 505 to 29,500 mg/kg heavy oil. Some VOCs and PAHs were detected at very low concentrations (see Figure 5).

Groundwater onsite has been impacted by petroleum hydrocarbons and some associated VOCs. Concentrations range from 1,020 to 2,650 µg/L gasoline, 118,000 µg/L diesel, and 1,720 µg/L oil (see Figure 6). Groundwater contamination does not appear to extend offsite.

Human health risk.

There are concentrations of petroleum hydrocarbons in soil and groundwater that construction and excavation workers could encounter should the property be redeveloped. However, the contamination is at depth and below risk-based concentrations for these receptors.

Concentrations of diesel and gasoline in groundwater exceed the 2023 groundwater RBCs for vapor intrusion into commercial buildings. These concentrations do not exceed the previous RBCs that were in place when the site closure was initially requested. Groundwater is perched on basalt and 11 to 22 feet below ground surface. There is a vertical distance of at least 11 feet between the groundwater and the slab of the building and there is no soil contamination between the dissolved phase groundwater source and the building. The Environmental Protection Agency (EPA) guidance ([Technical Guide For Addressing Petroleum Vapor Intrusion At Leaking Underground Storage](#)) establishes a 6-foot separation with no precluding factors present as not needing further investigation. This vertical distance allows for bio attenuation to occur making this pathway incomplete.

Soil and groundwater conditions at the site are protective of human health given the current use as commercial retail.

Ecological risk.

The site is a fully paved commercial site. The contamination remaining at the site is between 9 and 11 feet bgs. Groundwater contamination is restricted to the site, therefore, discharge to surface water should not be a concern. There are, therefore, no unacceptable ecological risks identified for the site.

5. RECOMMENDATION

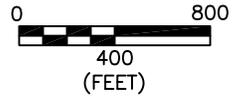
Based on sample results for soil and groundwater, acceptable risk levels are not exceeded, and a No Further Action determination is recommended for this site. The No Further Action determination should be recorded in DEQ's environmental data management system also known as Your DEQ Online (YDO) under the project number LUST24-15-0202.

6. ADMINISTRATIVE RECORD

2014-08-21_24-15-0202_PhaseI-ESA
2014-10-28_24-15-0202_Hoist-PhaseII-ESA
2014-11-07_24-15-0202_PhaseII-Scope of Work
2015-02-20_24-15-0202_Extent-PhaseII-ESA

7. ATTACHMENTS

Figure 2: Site Aerial (BB&A Environmental)
Figure 4: Site Exploration Plan (BB&A Environmental)
Figure 5: Site Plan with Soil Analytical Data (BB&A Environmental)
Figure 6: Site Plan with Groundwater Analytical Data (BB&A Environmental)



 SITE LOCATION



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32986 Roberts Ct.
Coburg, OR
ph: 541.484.9484

PORTLAND OFFICE
25195 SW Parkway Ave., #207
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**SITE AERIAL
COMMERCIAL PROPERTY**

4403 COMMERCIAL ST. SE & 4516 SUNNYSIDE RD. SE, SALEM, OR

PROJECT CODE:
CBC04PH1.14E

DATE:
07/31/14

SCALE:
AS SHOWN

DRAWN:
K.D.DESIGNS

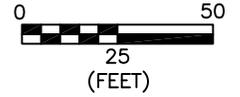
CHECKED:
MIKE FAULKNER

FIGURE #:

2

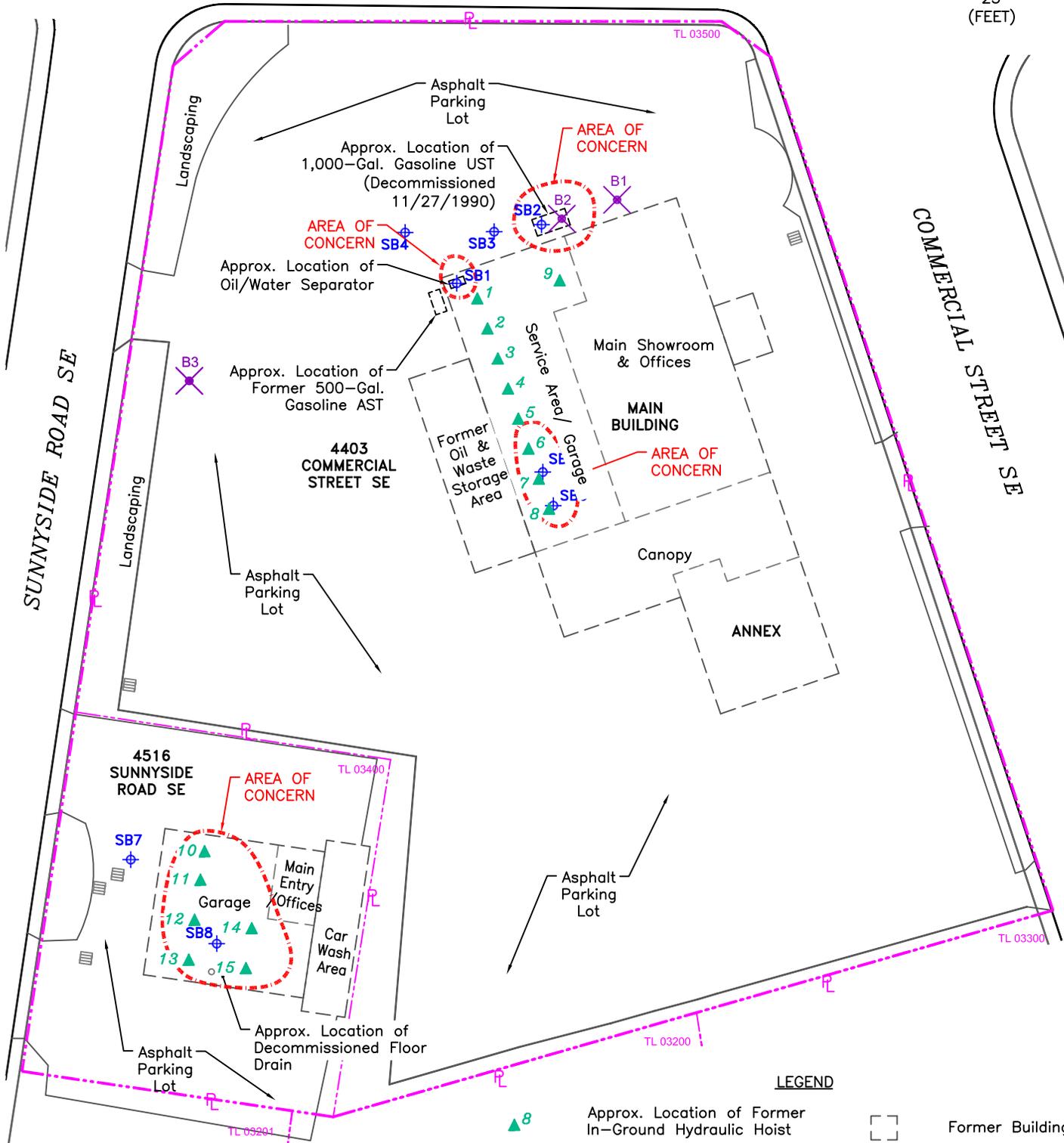


HILFIKER LANE SE



SUNNYSIDE ROAD SE

COMMERCIAL STREET SE



LEGEND

- 8 Approx. Location of Former In-Ground Hydraulic Hoist
- SB1 Push Probe Location and Identification Number (By BB&A (10/2014))
- B1 Soil Sample Location and Identification Number (By LSI Adept, Inc (1/4/2005))
- Former Building
- Building
- Property Line
- TL 03500 Tax Lot Number
- Catch Basin



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SITE EXPLORATION PLAN COMMERCIAL PROPERTY

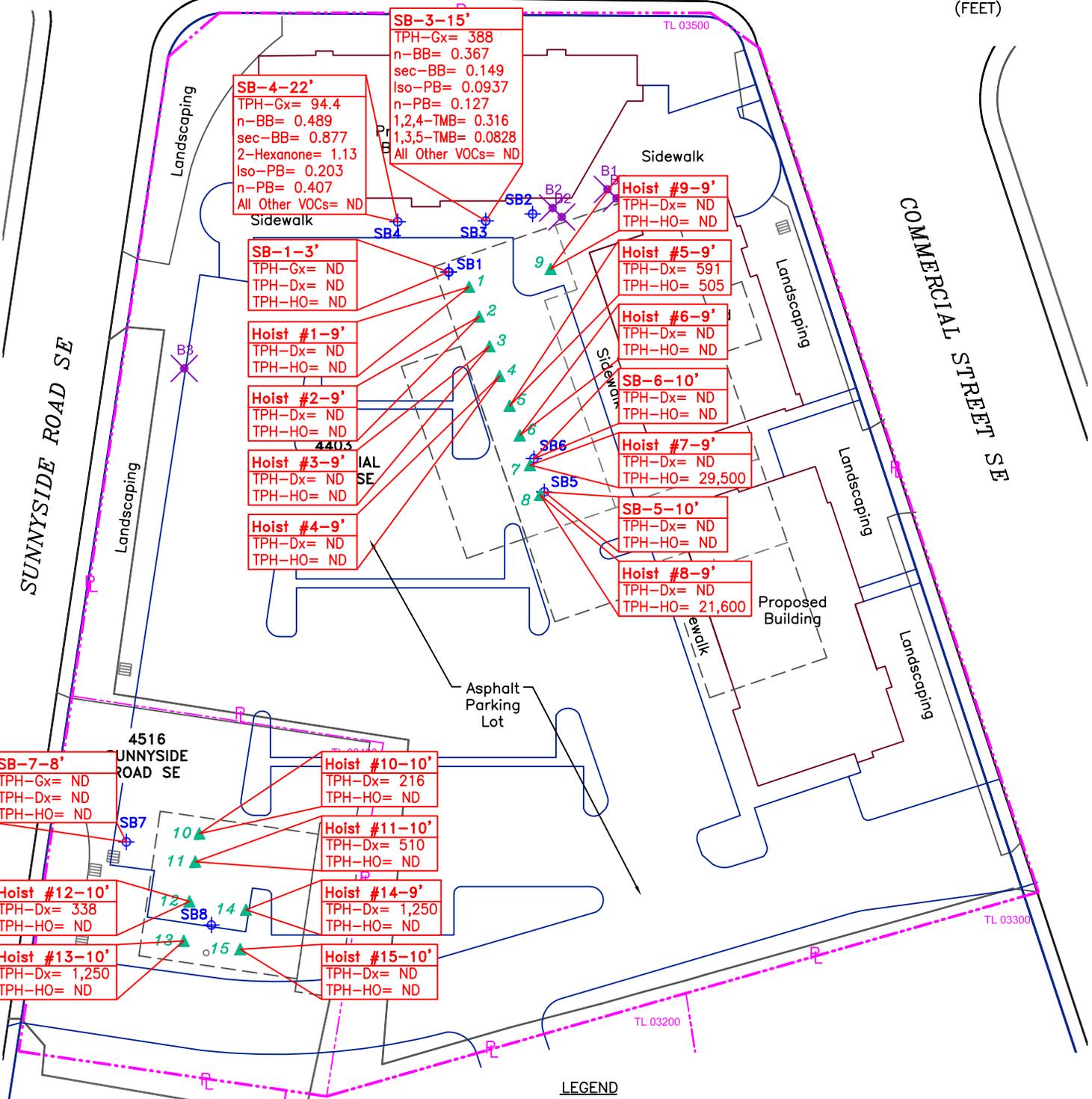
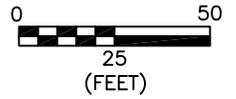
4403 COMMERCIAL ST. SE & 4516 SUNNYSIDE RD. SE, SALEM, OR

| | | | | |
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| PROJECT CODE: CBC04PH1.14E | DATE: 10/24/14 | SCALE: AS SHOWN | DRAWN: K.D.DESIGNS | CHECKED: MIKE FAULKNER |
|-------------------------------|-------------------|--------------------|-----------------------|---------------------------|

FIGURE #:

4

HILFIKER LANE SE



SB-3-15'
 TPH-Gx= 388
 n-BB= 0.367
 sec-BB= 0.149
 Iso-PB= 0.0937
 n-PB= 0.127
 1,2,4-TMB= 0.316
 1,3,5-TMB= 0.0828
 All Other VOCs= ND

SB-4-22'
 TPH-Gx= 94.4
 n-BB= 0.489
 sec-BB= 0.877
 2-Hexanone= 1.13
 Iso-PB= 0.203
 n-PB= 0.407
 All Other VOCs= ND

SB-1-3'
 TPH-Gx= ND
 TPH-Dx= ND
 TPH-HO= ND

Hoist #1-9'
 TPH-Dx= ND
 TPH-HO= ND

Hoist #2-9'
 TPH-Dx= ND
 TPH-HO= ND

Hoist #3-9'
 TPH-Dx= ND
 TPH-HO= ND

Hoist #4-9'
 TPH-Dx= ND
 TPH-HO= ND

Hoist #9-9'
 TPH-Dx= ND
 TPH-HO= ND

Hoist #5-9'
 TPH-Dx= 591
 TPH-HO= 505

Hoist #6-9'
 TPH-Dx= ND
 TPH-HO= ND

SB-6-10'
 TPH-Dx= ND
 TPH-HO= ND

Hoist #7-9'
 TPH-Dx= ND
 TPH-HO= 29,500

SB-5-10'
 TPH-Dx= ND
 TPH-HO= ND

Hoist #8-9'
 TPH-Dx= ND
 TPH-HO= 21,600

SB-7-8'
 TPH-Gx= ND
 TPH-Dx= ND
 TPH-HO= ND

Hoist #10-10'
 TPH-Dx= 216
 TPH-HO= ND

Hoist #11-10'
 TPH-Dx= 510
 TPH-HO= ND

Hoist #12-10'
 TPH-Dx= 338
 TPH-HO= ND

Hoist #14-9'
 TPH-Dx= 1,250
 TPH-HO= ND

Hoist #13-10'
 TPH-Dx= 1,250
 TPH-HO= ND

Hoist #15-10'
 TPH-Dx= ND
 TPH-HO= ND

LEGEND

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- B1 Soil Sample Location and Identification Number (By LSI Adept, Inc (1/4/2005))
- Proposed Building
- Catch Basin
- Former Building
- Property Line
- TL 03500 Tax Lot Number

SB-4-22'
 TPH-Gx= 94.4
 n-BB= 0.489
 sec-BB= 0.877
 2-Hexanone= 1.13
 Iso-PB= 0.203
 n-PB= 0.407
 All Other VOCs= ND

Total Petroleum Hydrocarbons per Northwest Method NWTPH-Gx (Gasoline), NWTPH-Dx (Diesel), NWTPH-HO (Heavy Oil); Volatile Organic Compounds (VOCs) per EPA Method 8260B; All units in parts per million (ppm); ND= NOT Detected



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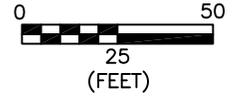
SITE PLAN WITH SOIL ANALYTICAL DATA
COMMERCIAL PROPERTY
 4403 COMMERCIAL ST. SE & 4516 SUNNYSIDE RD. SE, SALEM, OR

PROJECT CODE: CBC04PH1.14E DATE: 10/24/14 SCALE: AS SHOWN DRAWN: K.D.DESIGNS CHECKED: MIKE FAULKNER

FIGURE #:
5



HILFIKER LANE SE



SB-3-GW
 TPH-Gx= 3,120
 B= 4.30
 E= 34.0
 X= 18.4
 n-BB= 23.7
 sec-BB= 17.4
 Iso-PB= 19.0
 n-PB= 62.5
 1,2,4-TMB= 22.6
 All Other VOCs= ND

SB-4-GW
 TPH-Gx= 2,650
 B= 5.64
 E= 5.09
 X= 9.06
 N= 9.48
 1,4-Dichlorobenzene= 0.640
 1,2-Dichloroethane= 0.720
 n-BB= 11.8
 sec-BB= 12.4
 4-Isopropyltoluene= 2.31
 Iso-PB= 29.7
 n-PB= 26.7
 1,2,4-TMB= 80.0
 1,3,5-TMB= 22.7
 All Other VOCs= ND

SB-2-GW
 TPH-Gx= 1,020

SB-7-GW
 HClD
 TPH-Gx= ND
 TPH-Dx= DET
 TPH-HO= DET
 NWTPH-Dx= ND
 NWTPH-HO= 1,720
 Chloroform= 2.77
 All Other VOCs= ND

SB-8-GW
 TPH-Dx= 118,000
 TPH-HO= ND
 Chloroform= 11.3
 All Other VOCs= ND

SB-8-GW
 TPH-Dx= 118,000
 TPH-HO= ND
 Chloroform= 11.3
 All Other VOCs= ND

Total Petroleum Hydrocarbons per Northwest Method NWTPH-Gx (Gasoline), NWTPH-Dx (Diesel), NWTPH-HO (Heavy Oil); Volatile Organic Compounds (VOCs) per EPA Method 8260B; All units in parts per million (ppb); ND= NOT Detected



LEGEND

- Approx. Location of Former In-Ground Hydraulic Hoist
- Push Probe Location and Identification Number (By BB&A (10/2014))
- Soil Sample Location and Identification Number (By LSI Adept, Inc (1/4/2005))



- Proposed Building
- Catch Basin
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- Property Line
- Tax Lot Number



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SITE PLAN WITH GROUNDWATER ANALYTICAL DATA
COMMERCIAL PROPERTY
 4403 COMMERCIAL ST. SE & 4516 SUNNYSIDE RD. SE, SALEM, OR

FIGURE #:
6

| | | | | |
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| PROJECT CODE: CBC04PH1.14E | DATE: 10/24/14 | SCALE: AS SHOWN | DRAWN: K.D.DESIGNS | CHECKED: MIKE FAULKNER |
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