Oregon
Tina Kotek, Governor

Department of Environmental Quality
Northwest Region
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Portland, OR 97232
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TTY 711

January 26, 2026

Banks School District
13050 NW Main Street
Banks, Oregon, 97103

RE: No Further Action Determination
for Banks High School
Banks, Oregon
Leading Underground Storage Tank (LUST) Program No. 34-14-0891

To Whom it May Concern:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information for the Banks High School site/property, including the closure report entitled *Unregulated Gasoline Tank Decommissioning and Risk-Based Closure Report* dated August 25, 2014, which was submitted to DEQ by EVREN Northwest Inc. (ENW) on your behalf. The Banks High School address is 13050 Northwest Main Street, Banks, Oregon, 97103, Tax Lot 6900 of Washington County Map No. 2N331BC.

DEQ has determined that remedial action to address environmental contamination at Banks High School 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 including the following:

- The 15.32 acre Site is developed with the Banks High School, including several school buildings and athletic facilities. The Site is bordered to the north by residential and commercial properties; to the west by NW Main Street with residential properties and agricultural land beyond; to the south by athletic fields with residential and commercial properties beyond; and to the east by residential properties with agricultural land beyond. The Site is likely to continue to be used as a high school in the foreseeable future.
- A 1,050-gallon underground storage tank was discovered on July 3, 2014, during demolition of an existing grounds keeping building, which was located 80 feet west of the track and field facility and 18 feet south of the track and field grandstands. The tank was located approximately 2.5 feet below ground surface.
- Laboratory analytical results determined that soils adjacent to the tank were impacted at up to 3,400-milligrams per kilogram gasoline-range organics (GRO), exceeding DEQ's Soil Matrix Level 2 cleanup level. Approximately 596 tons of impacted soil were excavated and disposed of at Hillsboro Landfill. The excavation was completed to a depth of 10.5 feet.
- Groundwater was observed seeping into the tank excavation at an approximate depth of 10.5 feet. A groundwater (pit water) sample was collected after evacuating the pit of water and allowing it to recover. No GRO or related volatile organic compound (VOC) constituents were detected.

Confirmation soil samples were collected from the excavation floor and sidewalls. All confirmation samples were "nondetect" for GRO VOCs, and total lead.

- Future groundwater contamination associated with the UST petroleum release is not expected because all impacted soils have been removed and the concentrations of GRO and VOCs in the source-area reconnaissance groundwater sample did not exceed laboratory reporting limits.
- There is no risk of exposure to Site contamination by human or ecological receptors because all contaminated soils have been removed.

Based on the available information, soil and groundwater conditions at Banks High School are currently protective of public health and the environment in accordance with Oregon Administrative Rules 340-122-0205 through 340-122-0360. 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 will update the Your DEQ Online (YDO) database 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 local, state and federal regulations.

Documents supporting this No Further Action decision, including the *Unregulated Gasoline Tank Decommissioning and Risk-Based Closure Report*, can be viewed on the Your DEQ Online (YDO) database (YDO Link). DEQ recommends keeping a copy of all of the documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Deb Goldberg at (971) 985-9391, or via email at deb.goldberg@deq.oregon.gov.

Sincerely,

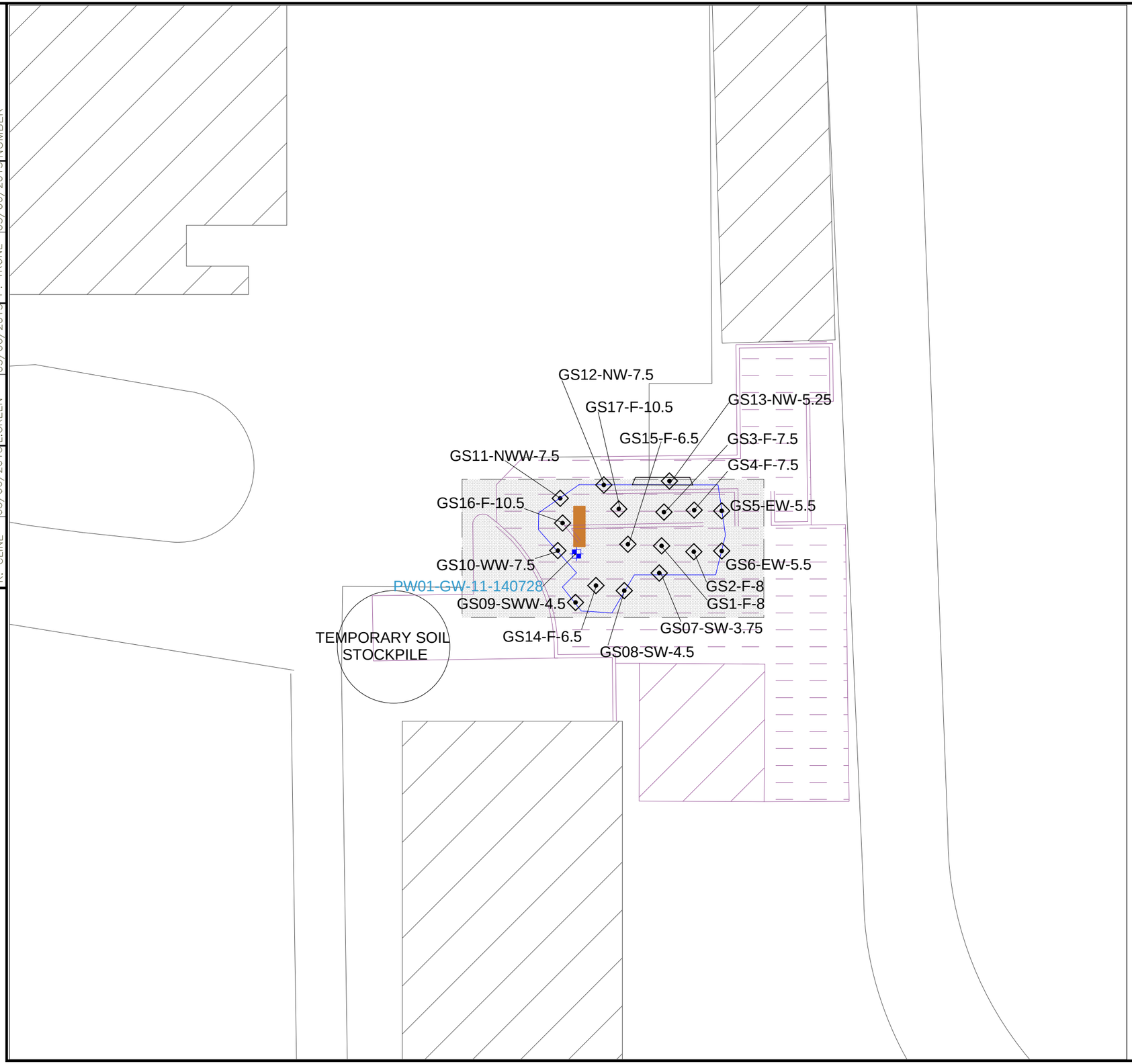
Peter F Donahower

Peter Donahower, Manager
Northwest Region Petroleum Cleanup Section

Attachment(s): Figure 4 – Sample Location Diagram
Table 1 – Summary of Analytical Data, Soil
Tabel 2 – Summary of Analytical Data, Reconnaissance Ground Water Recharge

cc: EVREN Northwest Inc.
LUST #34-14-0891 File

DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
K. CLINE 05/06/2013	L.GREEN 05/06/2013	P. TRONE 05/06/2013	809-13002(v01)



LEGEND:

- SUBJECT BUILDINGS
- FUTURE DEVELOPMENT
- FORMER UNDERGROUND STORAGE TANK LOCATION
- SUBJECT BUILDINGS (DEMOLISHED)
- APPROXIMATE EXCAVATION BOUNDARIES
- ENW GRAB SAMPLE LOCATION @ DEPTH IN FEET BGS

GS01-140708-E-8

BGS: BELOW GROUND SURFACE

NOTES:

1. BASE MAP DEVELOPED FROM AN AERIAL PHOTOGRAPH MAP DATED 2012 AND ENW FIELD NOTES.
2. ALL BUILDING, STREET, FEATURE, AND SAMPLE LOCATIONS ARE APPROXIMATE.

APPROXIMATE SCALE

0 30 60 FEET

N

EVREN NORTHWEST INC.
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FIGURE 4
SAMPLE LOCATION DIAGRAM
(SOIL AND PIT WATER CONFIRMATION)

BANKS MIDDLE SCHOOL
12950 NW MAIN STREET
BANKS, OREGON

Table 1 - Summary of Analytical Data, Soil

	Location ID	GS01	GS02	GS03	GS04	GS05	GS06	SP01	GS1	GS2	GS3	GS4	GS5
	Sample ID	GS01-140708-E-8	GS02-140708-W-8	GS03-140708-INT-E-9	GS04-140708-INT-W-9	GS05-140708-INT-N-9	GS06-140708-INT-S-9	SP01-COMP	GS1-140725-F-8	GS2-140725-F-8	GS3-140725-F-7.5	GS4-140725-F-7.5	GS5-140725-EW-5.5
	Date Sampled	7/8/2014	7/8/2014	7/8/2014	7/8/2014	7/8/2014	7/8/2014	7/8/2014	7/25/14	7/25/14	7/25/14	7/25/14	7/25/14
	Depth Sampled (feet)	8	8	9	9	9	9	N/A	8	8	7.5	7.5	5.5
	Sampled By	ENW	ENW	ENW	ENW	ENW	ENW	ENW	ENW	ENW	ENW	ENW	ENW
	Location	N end of tank	S end of tank	N wall of tank pit (soil water interface)	S wall of tank pit (soil water interface)	W wall of tank pit (soil water interface)	E wall of tank pit (soil water interface)	Soil stockpile SW of tank	Floor of excavation	Floor of excavation	Floor of excavation	Floor of excavation	East wall of excavation
Constituent of Interest	Note	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)
Volatile Organic Constituents													
Benzene	c, v	---	<0.418 (ND)	---	---	---	---	---	---	---	---	---	---
EDB (1,2-dibromoethane)	c, v	---	---	---	---	---	---	---	---	---	---	---	---
EDC (1,2-dichloroethane)	c, v	---	---	---	---	---	---	---	---	---	---	---	---
Ethylbenzene	c, v	---	11.0	---	---	---	---	---	---	---	---	---	---
MTBE (methyl t-butyl ether)	c, v	---	---	---	---	---	---	---	---	---	---	---	---
Naphthalene	c, v	---	---	---	---	---	---	---	---	---	---	---	---
Propylbenzene, iso	nc, v	---	---	---	---	---	---	---	---	---	---	---	---
Toluene	nc, v	---	<1.67 (ND)	---	---	---	---	---	---	---	---	---	---
Trimethylbenzene, 1,2,4-	nc, v	---	---	---	---	---	---	---	---	---	---	---	---
Trimethylbenzene, 1,3,5-	nc, v	---	---	---	---	---	---	---	---	---	---	---	---
Xylenes	nc, v	---	59.2	---	---	---	---	---	---	---	---	---	---
Metals													
Lead	NA, nv	---	14.6	---	---	---	---	---	---	---	---	---	---
Total Petroleum Hydrocarbons													
GRO	nc, nv	**3450**	**3300**	---	---	---	---	**900**	<2 (ND)	<2 (ND)	<2 (ND)	<2 (ND)	<2 (ND)
DRO	nc, nv	<69.5 (ND)	<62.9 (ND)	---	---	---	---	<25 (ND)	---	---	---	---	---
RRO	nc, nv	<139 (NP)	<126 (NP)	---	---	---	---	<50 (ND)	---	---	---	---	---

Notes:

mg/Kg = milligram per kilogram or parts per million (ppm).

<# (ND) = not detected at or above the laboratory method reporting limit shown.

NE = not established.

NP = not present at or above the laboratory method reporting limit shown (HCID analysis).

— = not analyzed or not applicable.

c = carcinogenic

nc = noncarcinogenic

v = volatile

nv = nonvolatile

GRO = gasoline-range organics.

DRO = diesel-range organics.

RRO = residual-range organics.

Pink cells in table indicate soils that have been removed to appropriate waste disposal/recycling locations

Bolded concentrations exceed either Soil Matrix Cleanup Standards or screening level risk-based concentrations and background concentrations, as applicable.

[1] Lowest Risk-Based Concentration for soil (screening level).

Table 1 - Summary of Analytical Data, Soil

Location ID		GS6	GS07	GS08	GS09	GS10	GS11	GS12	GS13	GS14	GS15	GS16	GS17
Sample ID		GS6-140725-EW-5.5	GS07-SW-3.75	GS08-SW-4.5	GS09-SWW-4.5	GS10-WW-7.5	GS11-NWW-7.5	GS12-NW-7.5	GS13-NW-5.25	GS14-F-6.5	GS15-F-8	GS16-F-10.5	GS17-F-10.5
Date Sampled		7/25/14	7/28/14	7/28/14	7/28/14	7/28/14	7/28/14	7/28/14	7/28/14	7/28/14	7/28/14	7/28/14	7/28/14
Depth Sampled (feet)		5.5	3.75	4.5	4.5	7.5	7.5	7.5	5.25	6.5	8	10.5	10.5
Sampled By		ENW	ENW	ENW	ENW	ENW	ENW	ENW	ENW	ENW	ENW	ENW	ENW
Location		East wall of excavation	South wall of excavation	South wall of excavation	Southwest wall of excavation	West Wall of excavation	Northwest wall of excavation	North wall of excavation	North wall of excavation	Floor of excavation	Floor of excavation	Floor of excavation	Floor of excavation
Constituent of Interest	Note	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)
Volatile Organic Constituents													
Benzene	c, v	---	---	---	---	---	---	---	---	---	---	<0.03 (ND)	---
EDB (1,2-dibromoethane)	c, v	---	---	---	---	---	---	---	---	---	---	<0.05 (ND)	---
EDC (1,2-dichloroethane)	c, v	---	---	---	---	---	---	---	---	---	---	<0.05 (ND)	---
Ethylbenzene	c, v	---	---	---	---	---	---	---	---	---	---	<0.05 (ND)	---
MTBE (methyl t-butyl ether)	c, v	---	---	---	---	---	---	---	---	---	---	<0.05 (ND)	---
Naphthalene	c, v	---	---	---	---	---	---	---	---	---	---	<0.05 (ND)	---
Propylbenzene, iso	nc, v	---	---	---	---	---	---	---	---	---	---	<0.05 (ND)	---
Toluene	nc, v	---	---	---	---	---	---	---	---	---	---	<0.05 (ND)	---
Trimethylbenzene, 1,2,4-	nc, v	---	---	---	---	---	---	---	---	---	---	<0.05 (ND)	---
Trimethylbenzene, 1,3,5-	nc, v	---	---	---	---	---	---	---	---	---	---	<0.05 (ND)	---
Xylenes	nc, v	---	---	---	---	---	---	---	---	---	---	<0.1 (ND)	---
Metals													
Lead	NA, nv	---	---	---	---	---	---	---	---	---	---	---	---
Total Petroleum Hydrocarbons													
GRO	nc, nv	<2 (ND)	<2 (ND)	<2 (ND)	<2 (ND)	<2 (ND)	<2 (ND)	<2 (ND)	<2 (ND)	<2 (ND)	<2 (ND)	<2 (ND)	<2 (ND)
DRO	nc, nv	---	---	---	---	---	---	---	---	---	---	---	---
RRO	nc, nv	---	---	---	---	---	---	---	---	---	---	---	---

Notes:

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Pink cells in table indicate soils that have been removed to appropriate waste disposal/recycling locations

Bolded concentrations exceed either Soil Matrix Cleanup Standards or screening level risk-based concentrations and background concentrations, as applicable.

[1] Lowest Risk-Based Concentration for soil (screening level).

Table 1 - Summary of Analytical Data, Soil

Location ID		Maximum Soil Concentration (remaining soil)	Soil Matrix Cleanup Level	ODEQs Screening-Level SLRBCs[1] (Soil)	Background Concentrations /Clean Fill Screening	Exceeds ODEQs Screening-Level SLRBCs (Soil) and/or Soil Matrix Cleanup Level	Exceeds Background Concentrations/Clean Fill Screening
Sample ID							
Date Sampled							
Depth Sampled (feet)							
Sampled By							
Location						TRUE OR Y FALSE OR N	TRUE OR Y FALSE OR N
Constituent of Interest	Note	mg/Kg (ppm)					
Volatile Organic Constituents							
Benzene	c, v	<0.03 (ND)	NE	0.0093	0.08	(Y)	FALSE
EDB (1,2-dibromoethane)	c, v	<0.05 (ND)	NE	0.000081	0.002	(Y)	(TRUE)
EDC (1,2-dichloroethane)	c, v	<0.05 (ND)	NE	0.0014	0.039	(Y)	(TRUE)
Ethylbenzene	c, v	<0.05 (ND)	NE	0.16	0.82	N	FALSE
MTBE (methyl t-butyl ether)	c, v	<0.05 (ND)	NE	0.092	1.58	N	FALSE
Naphthalene	c, v	<0.05 (ND)	NE	0.087	1.09	N	FALSE
Propylbenzene, iso	nc, v	<0.05 (ND)	NE	3500	1420	N	FALSE
Toluene	nc, v	<0.05 (ND)	NE	140	200	N	FALSE
Trimethylbenzene, 1,2,4-	nc, v	<0.05 (ND)	NE	16	47.7	N	FALSE
Trimethylbenzene, 1,3,5-	nc, v	<0.05 (ND)	NE	92	12	N	FALSE
Xylenes	nc, v	<0.10 (ND)	NE	25	100	N	FALSE
Metals							
Lead	NA, nv	<0 (ND)	NE	30	33.75	N	FALSE
Total Petroleum Hydrocarbons							
GRO	nc, nv	<2 (ND)	80	31	1200	FALSE	FALSE
DRO	nc, nv	---	500	1100	1100	TRUE	TRUE
RRO	nc, nv	---		2800	2800	TRUE	(TRUE)

Notes:

mg/Kg = milligram per kilogram or parts per million (ppm).

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NE = not established.

NP = not present at or above the laboratory method reporting limit shown (HCID analysis).

— = not analyzed or not applicable.

c = carcinogenic

nc = noncarcinogenic

v = volatile

nv = nonvolatile

GRO = gasoline-range organics.

DRO = diesel-range organics.

RRO = residual-range organics.

Pink cells in table indicate soils that have been removed to appropriate waste disposal/recycling locations

Bolded concentrations exceed either Soil Matrix Cleanup Standards or screening level risk-based concentrations and background concentrations, as applicable.

[1] Lowest Risk-Based Concentration for soil (screening level).

Table 2 - Summary of Analytical Data, Reconnaissance Ground Water Recharge

Sample ID		PW01-GW-11-140718	Maximum Ground Water Concentration	ODEQs Screening-level RBCs [2]	COPC?
Date Sampled		7/18/14			
Depth Sampled (feet)		11			
Sampled By		ENW			
Location		Tank Excavation			TRUE OR Y FALSE OR N
Constituent of Interest	Note	µg/L (ppb)	µg/L (ppb)		
Volatile Organic Constituents					
Benzene	c, v	<0.35 (ND)	<0.35 (ND)	0.39	N
EDB (1,2-dibromoethane)	c, v	<1 (ND)	<1 (ND)	0.0063	(Y)
EDC (1,2-dichloroethane)	c, v	<1 (ND)	<1 (ND)	0.14	(Y)
Ethylbenzene	c, v	<1 (ND)	<1 (ND)	1.4	N
MTBE (methyl t-butyl ether)	c, v	<1 (ND)	<1 (ND)	12	N
Naphthalene	c, v	<1 (ND)	<1 (ND)	0.14	(Y)
Propylbenzene, iso	nc, v	<1 (ND)	<1 (ND)	680	N
Toluene	nc, v	<1 (ND)	<1 (ND)	2300	N
Trimethylbenzene, 1,2,4-	nc, v	<1 (ND)	<1 (ND)	15	N
Trimethylbenzene, 1,3,5-	nc, v	<1 (ND)	<1 (ND)	360	N
Xylenes	nc, v	<2 (ND)	<2 (ND)	200	N
Metals					
Lead	NA, nv	<1 (ND)	<1 (ND)	15	N
Total Petroleum Hydrocarbons					
GRO	nc, nv	<100 (ND)	<100 (ND)	110	N

Notes:
ug/L = micrograms per Liter or parts per billion (ppb).
NE = not established.
nc = noncarcinogenic
nv = nonvolatile
DRO = diesel-range organics.
RRO = residual-range organics.
Bolded concentrations exceed screening level risk-based concentrations, as applicable.

[1] Lowest Risk-Based Concentration for ground water (screening level).
(Y) indicates analyte not detected, but detection limit is above screening concentration.