



# Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region

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TTY 711

March 12, 2026

John Pugh  
31366 Shedd Cemetery Drive  
Shedd, OR 97377

RE: No Further Action Determination  
for Pugh Agricultural Property, Shedd  
LUST #22-19-0412

Dear John Pugh:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information for the Pugh Agricultural Property site, including the closure report entitled *Supplemental Soil and Groundwater Investigation and Conceptual Site Model* dated January 6, 2023, which was submitted to DEQ by BB&A Environmental on your behalf. The Pugh Agricultural Property address is 29310 Highway 99E, Shedd, OR 97377, Linn County Map and Tax Lot 13S04W1300500.

DEQ has determined that remedial action to address environmental contamination at the Pugh Agricultural Property 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, and as more fully described in DEQ's Staff Memo dated June 14, 2023:

- The site has historically been used as a residence and for commercial agriculture. The central portion of the site includes a residence and several garages/storage areas. The northern and southern portions of the site include agricultural fields.
- In April 2019, three USTs were decommissioned by removal: one 500-gallon tank, one 675-gallon diesel tank and one 1,000-gallon diesel tank. The site includes the source area where at least one of the former USTs released fuel into the subsurface.
- Compliance soil and groundwater samples collected from the UST pits had detections of gasoline and diesel total petroleum hydrocarbons (TPH) and indicated a release had occurred and had potentially impacted groundwater at the site.
- Approximately 1,300 cubic yards of petroleum contaminated soils (PCS) were excavated from the site in August and September 2019. The PCS was transported to a nearby property with the same owner for treatment by aeration and bioremediation. The property owner obtained and fulfilled the requirements of a DEQ Solid Waste Letter of Authorization (SW-LOA) permit. The PCS was successfully remediated to acceptable levels below all leaching to groundwater and dermal contact, ingestion and inhalation risk-based concentrations. The treated soil was left in place at the nearby property under SW-LOA No. 1636.
- Residual soil contamination observed in the south/southeast sidewalls of the excavation indicated potential unacceptable risk with respect to dermal contact, ingestion and inhalation of volatile contaminants from tap water, and vapor intrusion risk to the onsite residence. Groundwater samples were collected from the three nearest wells to the site, including the well that supplies the site. All

three samples showed no detections of TPH, volatile organic compounds (VOCs) or polycyclic aromatic hydrocarbons (PAHs). Additionally, a soil gas sample and ambient air sample were collected at a point adjacent to the north side of the onsite residence. Concentrations of TPH were not observed in the soil gas or ambient air sample. VOCs were detected in both samples at levels below DEQ's risk-based concentrations.

- Current and likely future beneficial uses of groundwater at the site and in the vicinity include drinking water wells for domestic and irrigation purposes. The results from sampling the three nearest wells to the site indicate no unacceptable risk to residents and workers using the well.
- There is no unacceptable human health risk at the site. No risk-based concentrations were exceeded for residential, occupational, construction or excavation workers who may come into contact with contaminated soil and groundwater currently or in the likely future.
- There is no ecological habitat on site. Portions of the site include agricultural fields, however, contaminated soils have been delineated to be limited to the area of the site with the residence and associated structures. Groundwater was not encountered at the site and the potential for contaminated groundwater to impact offsite surface water bodies is low. Thus, there is no unacceptable ecological risk at the site.

Based on the available information, soil and groundwater conditions at the Pugh Agricultural Property are currently protective of public health and the environment in accordance with Oregon environmental cleanup law, 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 Leaking Underground Storage Tank (LUST) database to reflect this decision.

This letter only applies to the release 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. Monitoring wells should be maintained or decommissioned in accordance with Oregon Water Resources Department regulations.

A copy of the BB&A Environmental closure report and DEQ's Staff Memo supporting this No Further Action decision can be viewed at <https://ordeq.org/LUST22-19-0412>. DEQ recommends keeping a copy of all the documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Peter Donahower at 503-314-4720, or via email at [peter.donahower@deq.oregon.gov](mailto:peter.donahower@deq.oregon.gov).

Sincerely,

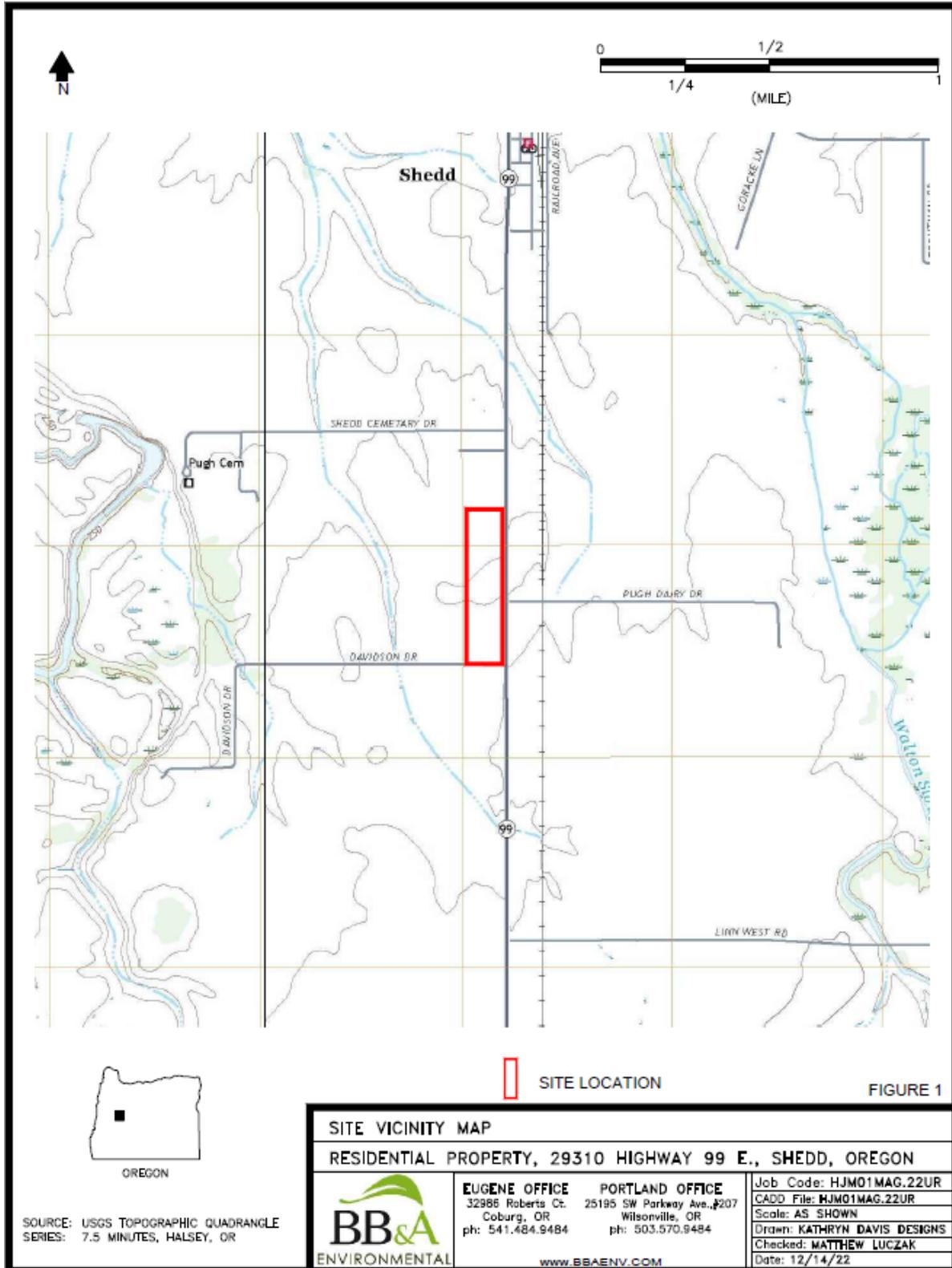
*Peter Donahower*

Peter Donahower, Manager  
Petroleum Cleanup Section

Attachments: Figure 1. Vicinity map, Figure 2. Site map

EC: ORMS LUST22-19-0412 (with attachments)  
Matthew Luczak, BB&A Environmental, [mluczak@bbaenv.com](mailto:mluczak@bbaenv.com)  
Bruce Scherzinger, Oregon DEQ, [bruce.scherzinger@deq.oregon.gov](mailto:bruce.scherzinger@deq.oregon.gov)

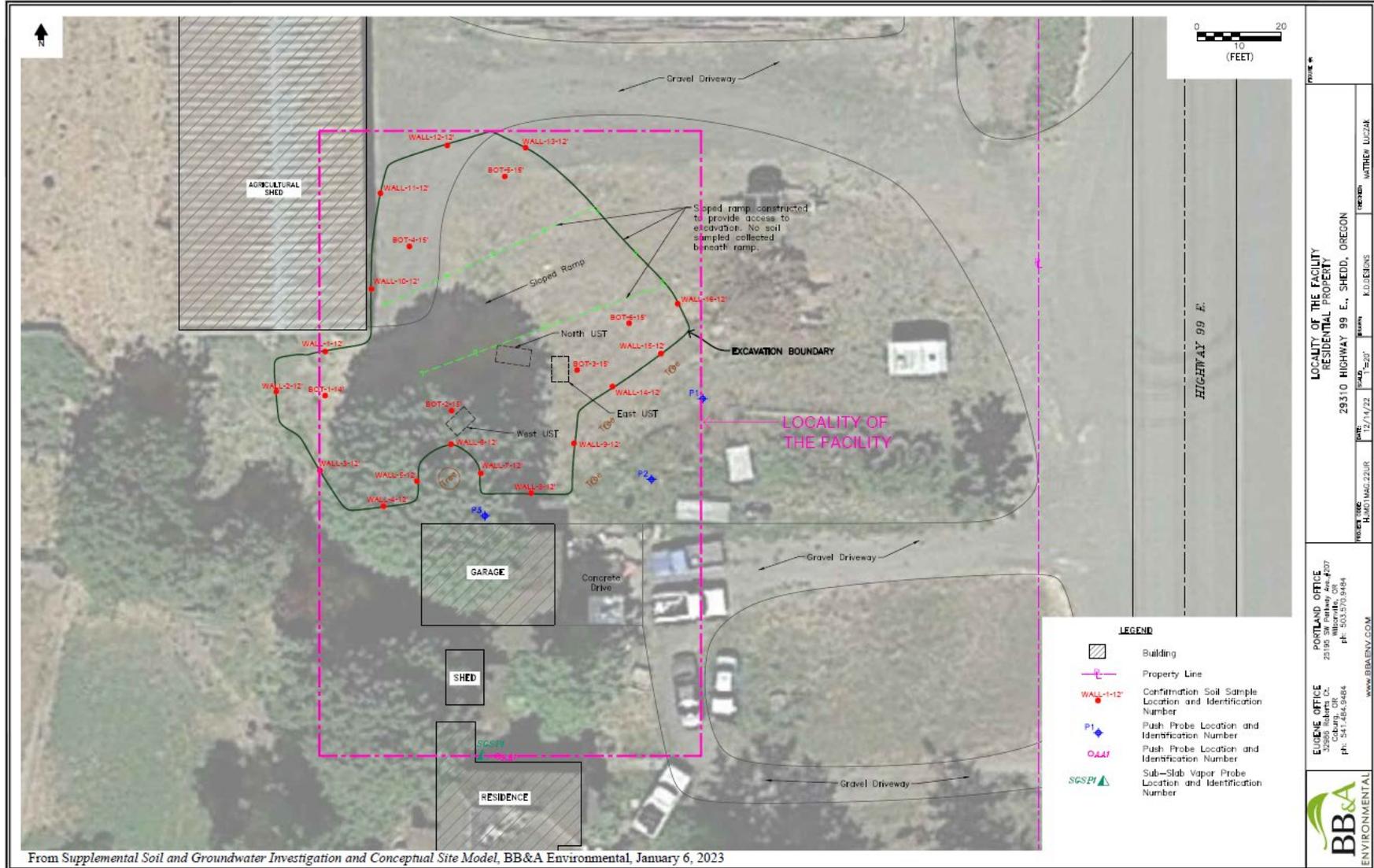
Figure 1. Site vicinity map



<b>SITE VICINITY MAP</b>		
<b>RESIDENTIAL PROPERTY, 29310 HIGHWAY 99 E., SHEDD, OREGON</b>		
 <b>BB&amp;A</b> ENVIRONMENTAL www.BBAENV.COM	<b>EUGENE OFFICE</b> 32966 Roberts Ct. Coburg, OR ph: 541.484.9484	<b>PORTLAND OFFICE</b> 25195 SW Parkway Ave., #207 Wilsonville, OR ph: 503.570.9484
	Job Code: HJM01MAG.22UR	
	CADD File: HJM01MAG.22UR	
	Scale: AS SHOWN	
Drawn: KATHRYN DAVIS DESIGNS		Checked: MATTHEW LUCZAK
		Date: 12/14/22

From Supplemental Soil and Groundwater Investigation and Conceptual Site Model, B&A Environmental, January 6, 2023.

Figure 2. Site map



From Supplemental Soil and Groundwater Investigation and Conceptual Site Model, B&A Environmental, January 6, 2023.