

Date: February 17, 2026

To: Peter Donahower  
Manager, Northwest Region Petroleum Cleanup

From: Rebecca Digiustino  
NWR Cleanup Program Manager

Subject: Justification for Administrative Closure of LUST #03-21-1214

In September 2021, a Phase II Environmental Site Assessment (ESA) was conducted at the Pacific Pride cardlock facility located at 37396 Ruben Lane in Sandy, Oregon (site). Minor concentrations of total petroleum hydrocarbons and associated constituents were detected in soil and groundwater samples collected from the site<sup>1</sup>. A potential release was reported to Oregon Department of Environmental Quality (DEQ) as required by Oregon Administrative Rule (OAR) 340-122-0220 and the site was assigned Leaking Underground Storage Tank (LUST) file number 03-21-1214.

On August 23, 2024, DEQ received a letter from HydroCon<sup>2</sup> describing the site history, including information about a 1990 release that occurred at the site (LUST #03-90-0309). DEQ determined no further action was required to address the 1990 release and issued a No Further Action Determination letter on February 27, 2007<sup>3</sup>. Based on the concentrations observed during the Phase II ESA and the information DEQ obtained from the 1990 release LUST file, the soil and groundwater impacts appear to be residual contamination from a 1990 release at the Site. DEQ concludes that LUST No. 03-21-1214 should be administratively closed.

Attachment: No Further Action letter, dated February 27, 2007

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<sup>1</sup> SLR. Phase II ESA, 14 Marc Nelson Oil Products Facilities in Western Oregon. November 2021.

<sup>2</sup> HydroCon. "Sandy Ruben Pacific Pride Cardlock", Technical Memorandum. August 23, 2024.

<sup>3</sup> DEQ. "RE: Sandy Keylock", No Further Action letter for File No. 03-90-0309. February 27, 2007.