

Staff Memorandum

Date: June 30, 2026
To: FILE
Through: Brad Shultz and Bruce Scherzinger
From: Sarah Kingery
Western Region
Subject: Roth Building, LUST22-96-4019; Staff Memorandum in support of a 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 Roth Building, in Albany. As discussed in this report, contaminant concentrations in soil, groundwater, and soil vapor 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 used to prepare this memorandum is presented at the end of this report.

Background

Site location

The site's location can be described as follows:

- Address: 725 SE 1st Avenue East, Linn County, Oregon.
- Latitude 44.6385 North, longitude -123.0971 West
- Tax lot 7400, Township 11 South, Range 3 West, Section 6

Site setting

The site is approximately 0.68 acre in size, flat and paved with a 12,000-square-foot building currently used as a hardware and supply store. Adjacent properties are commercial and residential with a Union Pacific Railroad right-of-way and elevated tracks along the eastern boundary of the property.

Physical setting

The site is at an elevation of 210 feet above mean sea level. Soil encountered beneath the site consists of sandy, clayey silt over sandy gravel. Groundwater was encountered at 12 feet below ground surface (bgs) and likely fluctuates between 6 and 12 feet. Groundwater flow direction is most likely to the north towards the river.

Site history

The site was occupied by residences from 1888 to the 1910s, then used as a vacant lot, parking and storage until the 1950s or 1960s. Two underground storage tanks were removed from the site in 1996. There is no information on when the USTs were installed, however it is reported that their use was discontinued in 1974.

Beneficial Land and Water Use Determinations

Land use

The site and adjacent areas are zoned as Waterfront (WF). This zoning designation is intended to transition from the Willamette River waterfront into a mixture of housing, office, and retail uses (City of Albany, 2023b). This zoning generally allows commercial, institutional, and residential (except single unit detached). Infill and redevelopment are encouraged. Currently, commercial businesses are located on the site and adjacent properties. The site has been commercial since 1971. These uses are reasonably likely to continue in the future, although redevelopment of the site property to a residential use cannot be discounted.

Groundwater use

To determine current and reasonably likely future water uses within and adjacent to the locality of facility (LOF-area where contamination could be encountered) GSI completed a beneficial water use determination by reviewing groundwater use in the area, conducting a water use survey of properties adjacent to the site and reviewing City of Albany water supply information (see Roth Building Project Report, June 24, 2024, GSI).

GSI's water use determination indicates that the site and adjoining properties are connected to the City of Albany's municipal water system. The specific locations of two water wells (LINN 7173 and LINN 7176) could not be accurately determined (within a ¼ mile of site). However, these wells obtain water from depths of 52 to 82 feet bgs which are much deeper than the depth of shallow groundwater contamination encountered on the site, and it is unlikely that they could be impacted. Because municipal water is readily available, it is reasonably unlikely that groundwater will be used as a drinking water source within or adjacent to the LOF in the future.

Surface water use

The nearest surface water is the Willamette River located approximately 500 feet north of the site. This is outside of the LOF. Stormwater drains into a set of catch basins on the paved site and then is conveyed into the Albany stormwater conveyance system.

Investigation And Cleanup Work

Two underground storage tanks (USTs) were discovered at the site during asphalt paving activities in 1996. Use of the USTs is unknown. The USTs had capacities of 3,000 and 5,000-gallons and had not been used since at least 1974. The USTs were decommissioned by removal in 1996. Gasoline and diesel-range hydrocarbons were encountered in soil and the release was reported to DEQ. Leaking underground storage tank (LUST) file 22-96-4019 was opened. Approximately 253 cubic yards of petroleum contaminated soil were excavated and disposed of at Coffin Butte Landfill in Corvallis, Oregon.

Additional investigations have been conducted at the site between 2024 and 2026. These investigations were conducted by GSI under a task order contract with DEQ. The purpose of the investigations was to delineate groundwater and soil vapor conditions at the site. Six borings were

advanced in the vicinity of the former UST excavation. A monitoring well was installed (MW-1) in one of the borings located within the former UST excavation. One soil vapor well was installed between the former excavation and the southeast corner of the building. Two vapor pins were placed inside the building to measure conditions beneath the floor and two shallow vapor pins were placed in areas where contamination had previously been measured in the driveway.

Twenty-four soil samples, seven groundwater samples, one soil vapor sample and four shallow vapor samples were collected for analysis. The following analyses were performed:

- EPA Method 418.1 for total petroleum hydrocarbons (TPH)
- NWTPH-Gx and -Dx for gasoline and diesel range hydrocarbons
- EPA Method 7421 for dissolved lead
- EPA Method 8020 for benzene, toluene, ethylbenzene, and total xylenes
- EPA Method 8010 for 1,1-dibromoethane and 1,2-dichloroethane
- EPA Method 8260D for volatile organic compounds (VOCs)
- EPA Method 8270SIM for polycyclic aromatic hydrocarbons (PAHs)
- EPA Method TO-15 for low fraction TPH and VOCs

Nature and extent of contamination

Contaminants of interest at the site are gasoline and diesel-range hydrocarbons and their associated constituents. Soil, groundwater and soil vapor beneath the site have all been impacted by the release.

Soil contamination is present in the vicinity of the former UST excavation at depths of 5 to 10 feet below ground surface (bgs). Concentrations of gasoline-range hydrocarbons ranged from not detected to 333 mg/kg. Diesel concentrations ranged from not detected to 653 mg/kg. The highest concentrations were detected in borings P1, P2, and P4. Low levels of VOCs and PAHs were also detected in soil. Benzene was not detected, and ethylbenzene was detected at 0.00259 mg/kg in one sample from P1. PAHs were generally low except for 1-methylnaphthalene which was detected at concentrations ranging from 0.220 to 2.86 mg/kg in soil samples collected from P2 and P3.

Groundwater contains concentrations of diesel-range hydrocarbons ranging from 158 to 16,024 µg/l. This range of concentrations represents samples obtained from both MW-1 and grab samples from borings which can be skewed high due to sediments. Diesel in MW-1 was measured at a concentration of 561 µg/l. Gasoline was only detected in two grab samples (P2 and P3) at 643 µg/l and 268 µg/l, respectively. Benzene and ethylbenzene were not detected in groundwater. Low levels of VOCs and PAHs were detected in some of the water samples (see attached figures 7 and 8).

Soil vapor at depth was found to contain concentrations of low fraction TPH, BTEX and other VOCs at low concentrations. Shallow soil vapor samples collected directly above the former UST excavation and beneath the floor slab of the building did not contain concentrations of contaminants above the laboratory detection limits except for xylenes in location V2.

Risk Evaluation

Conceptual site model

The primary sources of contamination at the site were the USTs which have been removed. The secondary sources of contamination at the site are soil, groundwater, and soil vapor.

Pathways by which this contamination could reach human receptors are:

- soil ingestion, dermal contact, and inhalation.
- Vapor intrusion into buildings

Ingestion and inhalation from tapwater is an incomplete pathways because groundwater in this area has no beneficial use and water is provided by the local municipality.

The human receptors currently and reasonably likely affected are commercial/occupational (current) and construction workers, excavation workers and residential (future).

Contamination in soil is at depths greater than 3 feet making soil ingestion, dermal contact, and inhalation incomplete for occupational and residential receptors. Concentrations of contaminants in soil do not exceed the risk-based concentrations for construction and excavation workers. Construction and excavation workers could come into direct contact with contaminated groundwater in excavations. Contaminant concentrations in groundwater are below the RBCs for construction and excavation workers.

Commercial and future residential occupants of the site could be exposed to contaminants migrating with soil vapor into buildings. Contaminant concentrations in the shallow soil vapor are below the RBCs for commercial and residential receptors.

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. The CSM table in the attachments shows potential exposure pathways and receptors for this site. Based on this, applicable RBCs are identified and used for risk screening.

Human health risk

Concentrations of 1-methylnaphthalene in soil at 8 to 10 feet exceeds the direct contact RBCs for occupational and residential receptors. Because the contamination is at depths greater than 3 feet this is an incomplete pathway and there is no unacceptable risk.

Gasoline and diesel in groundwater and benzene and ethylbenzene in soil vapor at five feet exceed the RBCs for vapor intrusion into buildings. Additional sampling of subslab and shallow soil vapor did not detect contaminants above the RBC and therefore there is no unacceptable risk.

There were no other contaminant concentrations that exceeded the RBCs and therefore there is no unacceptable risk to human health identified for the site.

Ecological risk

The site is paved and in an urban setting which does not provide ecological habitat. There is no surface contamination that could run off with storm water or affect terrestrial receptors. There are, therefore, no unacceptable ecological risks identified for the site.

Recommendation

Based on sample results for soil, groundwater and soil vapor, 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 project number LUST22-96-4019.

Administrative Record

2024-01-23_22-96-4019_Roth_Work-Plan_Final

2024-06-24_22-96-4019_Roth-Project-Report_Final

2026-06-30_22-96-4019_RothBuilding-SSA-Report

These documents are available through our online records management system. Documents older than July 2023 may not be digitized but are available in our paper files through a public records request.

Attachments

1. CSM Table
2. Vicinity map (Figure 1 GSI)
3. Site Property and Sample Locations (Figure 2 GSI)

Non-discrimination statement

DEQ does not discriminate on the basis of race, color, national origin, disability, age, sex, religion, sexual orientation, gender identity, or marital status in the administration of its programs and activities.

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Conceptual Site Model

This table identifies the applicable risk-based concentrations (RBCs) based on pertinent pathways and receptors. Notes referred to in the table are as follows:

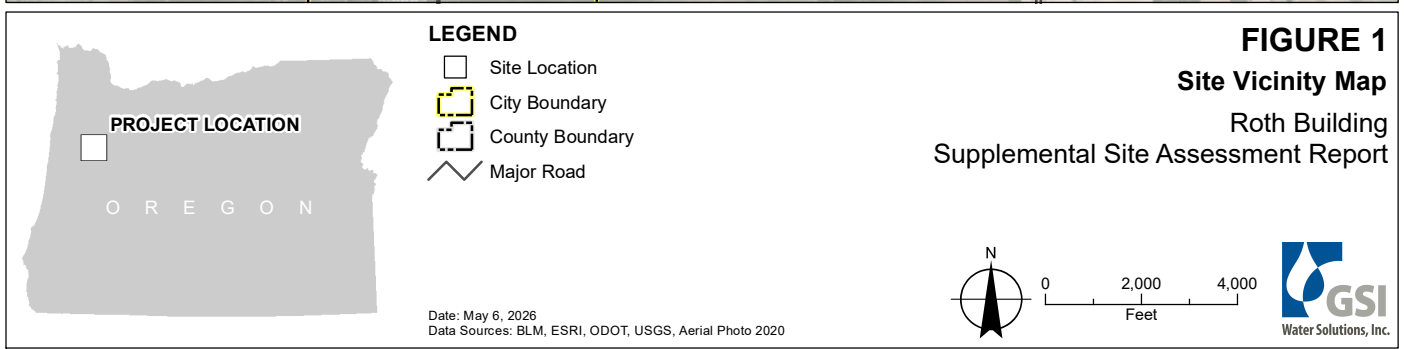
1. City water is provided. Local groundwater is not currently used for drinking water and is not likely to be used for this purpose in the future. Groundwater is not used for drinking. This pathway is therefore not considered, in accordance with Section B.3.2.4 of DEQ's RBDM guidance.

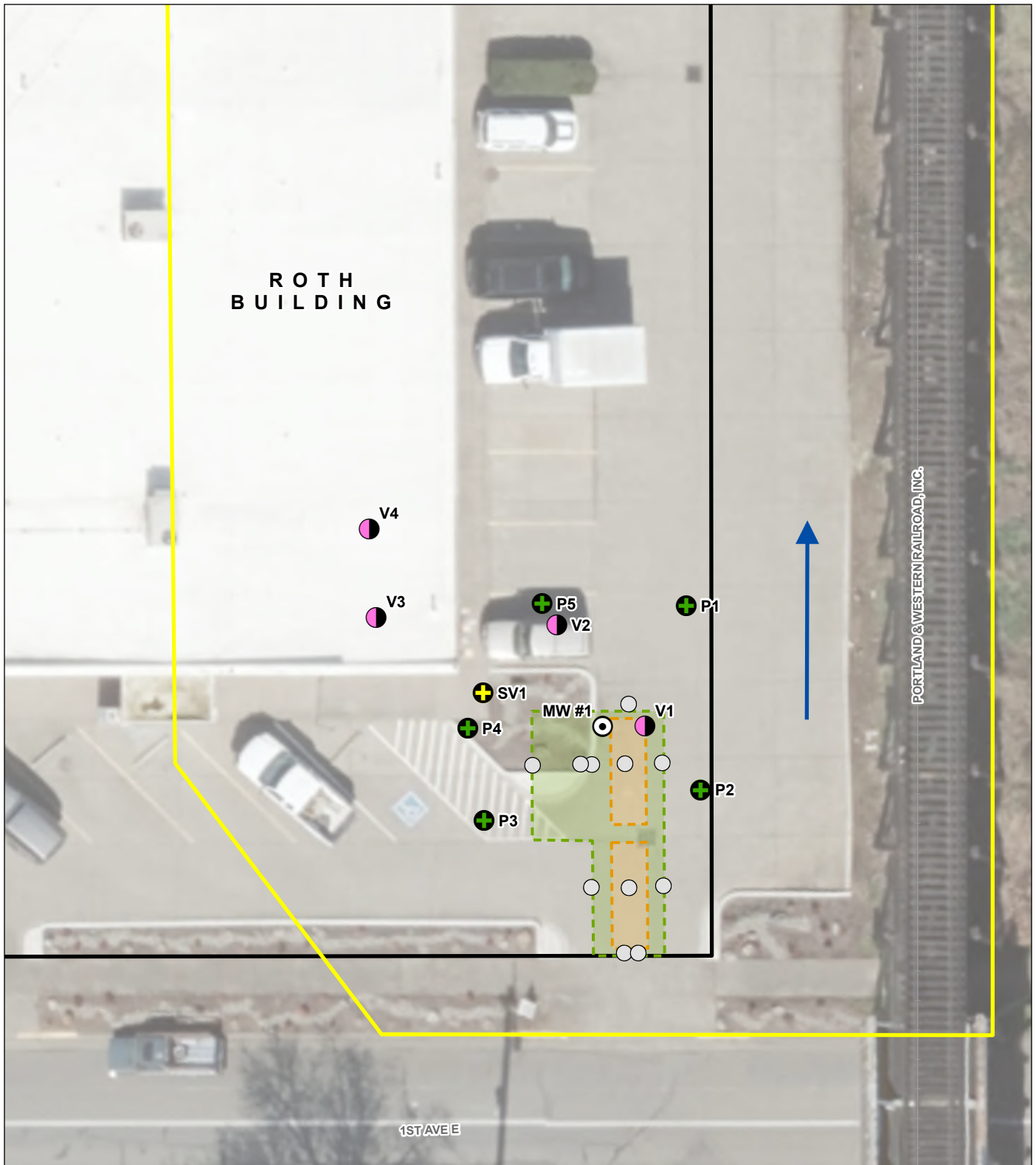
Pathway	Receptor	Is Pathway Complete? Yes, No	Is RBC Exceeded? Yes, No, NA	Basis for Selection or Exclusion
Soil-Ingestion, dermal contact and inhalation	Residential	No	NA	Soil contamination is at depths greater than 3 feet.
Soil-Ingestion, dermal contact and inhalation	Occupational	No	NA	Soil contamination is at depths greater than 3 feet.
Soil-Ingestion, dermal contact and inhalation	Construction worker	Yes	No	Concentrations are below the RBCs
Soil-Ingestion, dermal contact and inhalation	Excavation worker	Yes	No	Concentrations are below the RBCs
Soil-volatilization to outdoor air	Residential	Yes	No	Concentrations are below the RBCs
Soil-volatilization to outdoor air	Occupational	Yes	No	Concentrations are below the RBCs
Soil-Leaching to Groundwater	Residential	No	NA	Note 1
Soil-Leaching to Groundwater	Occupational	No	NA	Note 1
Groundwater-ingestion & inhalation from tapwater	Residential	No	NA	Note 1
Groundwater-ingestion & inhalation from tapwater	Occupational	No	NA	Note 1
Groundwater-volatilization to outdoor air	Residential	Yes	No	Concentrations are below the RBCs
Groundwater-volatilization to outdoor air	Occupational	Yes	No	Concentrations are below the RBCs
Groundwater-vapor intrusion into buildings	Residential	Yes	No	Concentrations in soil vapor are below RBCs
Groundwater-vapor intrusion into buildings	Occupational	Yes	No	Concentrations in soil vapor are below RBCs
Groundwater in excavation	Construction worker	Yes	No	Concentrations are below the RBCs.
Groundwater in excavation	Excavation worker	Yes	No	Concentrations are below the RBCs.

Pathway	Receptor	Is Pathway Complete? Yes, No	Is RBC Exceeded? Yes, No, NA	Basis for Selection or Exclusion
Soil vapor intrusion into buildings	Residential	Yes	No	Concentrations are below the RBCs.
Soil vapor intrusion into buildings	Commercial	Yes	No	Concentrations are below the RBCs.

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LEGEND

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|-----------------------------------|------------------------------------|
| Vapor Point Location | Former LUST |
| Push Probe Location (2024) | Excavation Area (1994) |
| Soil Vapor Sample Location (2024) | Property Boundary |
| Soil Sample (1996) | Locality of the Facility |
| Monitoring Well (1996) | Assumed Groundwater Flow Direction |
| | Railroad |

NOTE

All features are approximate.

Date: May 22, 2026

Data Sources: BLM, ESRI, ODOT, USGS, Aerial Photo (2020)

FIGURE 2

Site Plan and Sampling Locations
Roth Building
Supplemental Site Assessment Report

