



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Eugene Office

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TTY 711

December 30, 2025

Navi Kaur
Nimat Gas & Food Mart LLC
2430 Fieldcress Rd
Eugene, OR 97438

RE: Additional Work Required for Site Characterization

Nimat Gas & Food Mart LLC

LUST no. 20-23-0709

Dear Mr. Kaur:

I have been assigned as project manager for the leaking underground storage tank (LUST) site called Nimat Gas & Food Mart LLC. I have reviewed the file, and the most recent report titled UST Decommissioning/Site Closure Report submitted on your behalf by Full Cycle Environmental (December 26, 2023).

In an email to Roger Edens of Full Cycle (November 7, 2023) DEQ outlined steps that were required (attached). It does not appear that these steps have been completed based on the reports currently in our files. A soil remedial excavation was conducted at the site, however there are still data gaps related to groundwater, drinking water, and vapor intrusion into buildings that need to be resolved.

You are required to assess the following:

- The magnitude and extent of ground water contamination including the potential for shallow groundwater impacts to the river. This will involve, at a minimum, collecting groundwater samples to document groundwater contamination concentrations and extent, including downgradient of the remedial investigation area (likely including south of Jasper-Lowell Road). This assessment could be initiated with temporary “push probe” borings, but monitoring wells may be required depending on the results of the initial investigation.
- The current water quality of the onsite drinking water wells at adjacent properties. This involves collecting water samples for chemical analysis.
- The risk of vapor intrusion into the onsite building. This will likely involve collecting soil vapor samples near the building. Because it is likely that more than one soil vapor testing event will be required, DEQ recommends installing semi-permanent soil gas probes. Analyze all soil and groundwater and soil vapor samples for RBDM constituents per Table 2.1 of DEQ’s Risk-Based Decision-Making (RBDM) Guidance; and analyzing soil vapor samples by EPA Method TO-15.

You are required to submit a work plan to me for approval within the next 90 days for my review and approval. Before the work plan is prepared, I recommend arranging for a virtual meeting with me and your consultant who will be planning and implementing the investigation to discuss the scope of work and what should be included in the work plan. This will also give the consultant an opportunity to ask questions about what is required, methods used for the investigation and be provided important

information to guide their work plan preparation. The workplan should include boring and monitoring well locations (map should include scale), a groundwater monitoring plan including drinking water wells, and plan to collect soil vapor or sub-slab samples. Submit all reports, plans, laboratory data and other documentation to DEQ per Oregon Administrative Rule OAR 340-122-320 through 340-122-360. If you have performed additional investigation or cleanup at the property but have not submitted this information to DEQ, please submit to me via email at sarah.kingery@deq.oregon.gov.

Please have a workplan submitted to me by March 20, 2026. If you or your consultant have questions or would like to arrange a meeting to discuss the scope of work for the work plan, please contact me at (541) 321-3687 or sarah.kingery@deq.oregon.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sarah Kingery', with a stylized, cursive script.

Sarah Kingery
Environmental Cleanup Project Manager
Oregon Department of Environmental Quality

Attachment: Email 11/7/2023

cc: EdensR@FullCycleEnvironmental.com
Amy Chinitz, Water Resources Administrator, Springfield Utility Board

RE: Nimat Gas and Food Mart (AKA Jasper Store): Cleanup of Leaking UST required

Roger Edens <edensr@fullcycleenvironmental.com>

Tue 11/7/2023 11:51 AM

To: HANSON Don * DEQ <Don.HANSON@deq.oregon.gov>

Cc: DEQWRCleanup * DEQ <DEQWR.Cleanup@deq.oregon.gov>; ECKERT Dylan * DEQ <Dylan.ECKERT@deq.oregon.gov>

Thank you Don,

This is very helpful!

Roger



Roger Edens
R.G.
Environmental
Geologist
OR&WA
ICC Certifications
U1, U2, and U3

C: 541-668-1141

O: 458-202-9502

E:

EdensR@FullCycleEnvironmental.com

W: FullCycleEnvironmental.com

133 NE Greeley Ave, Bend, OR 97701

WHERE FISCAL RESPONSIBILITY AND
ENVIRONMENTAL RESPONSIBILITY WORK TOGETHER

From: HANSON Don * DEQ <Don.HANSON@deq.oregon.gov>

Sent: Tuesday, November 7, 2023 11:26 AM**To:** Roger Edens <edensr@fullcycleenvironmental.com>**Cc:** DEQWRCleanup * DEQ <DEQWR.Cleanup@deq.oregon.gov>; ECKERT Dylan * DEQ <Dylan.ECKERT@deq.oregon.gov>**Subject:** Nimat Gas and Food Mart (AKA Jasper Store): Cleanup of Leaking UST required

Dear Mr. Edens. Thank you for your efforts to document and mitigate contamination found during tank decommissioning on October 5, 2023. DEQ has assigned this release number 20-23-0709 in our Leaking Underground Storage Tank (LUST) database. I have been in communication with DEQ's UST Inspector, Dylan Eckert, regarding your initial response actions, and understand he was on site with you on Thursday November 2nd. As we have discussed, due to a large backlog, DEQ's LUST Cleanup program cannot immediately assign a Project Manager to guide the investigation and cleanup work. However, that does not relieve you and your client from the responsibilities prescribed in Oregon's cleanup statutes and rules. This site is located near the Willamette River, upstream of the Springfield Utility Board well field, which draws substantial quantities of water from the river. The soil in the vicinity of the site is highly permeable, increasing the threat of groundwater contaminant migration to the river. Thank you for recognizing these factors and the possible threat to human health and the environment from this release.

You will need to follow Oregon Revised Statute for risk-based assessment and cleanup, [340-122-0205 through -0360](#), and more particularly, 340-122-0244 for a risk-based approach. Refer to the [Underground Storage Tank Cleanup Manual](#) and the [Risk-Based Decision Making for the Remediation of Contaminated Sites](#) (RBDM) for more detailed guidance. It may also be necessary to review and follow [DEQ's Guidance for Assessing and Remediating Vapor Intrusion in Buildings](#). Below, I've included some steps from the rule that are required for this site, beyond what has been done thus far:

1. Remove free product, if present, to the maximum extent practicable;
2. Determine the magnitude and extent of the contamination in soil;

3. Determine the magnitude and extent of groundwater contamination, including an estimate of velocity and flow direction;
4. Conduct groundwater monitoring in accordance with OAR 340-0240(2);
5. Develop a conceptual site model and apply relevant risk-based concentrations as described in the RBDM guidance;
6. Evaluate the risk from contaminants remaining at the site and determine what additional cleanup may be needed to ensure levels of contamination remaining will not pose an unacceptable risk to human health or the environment; and
7. Make sure to consider vapor intrusion when conducting your risk evaluation.

Document your findings and all relevant data in reports and submit those to DEQ via email at degwr.cleanup@deg.oregon.gov. Make sure and include the LUST number when you do. In the meantime, until DEQ can assign a Project Manager to this case, please don't hesitate to call me or email me. I want to also remind you that Oregon law requires the DEQ to recover our regulatory oversight costs from responsible parties. Therefore, invoices for our oversight, including document reviews, will be sent to the owner. Thank you again for your work on this important site.

Sincerely,
Don Hanson

Donald E. Hanson, RG (he/him/his)
Project Manager/Hydrogeologist
Western Region Environmental Cleanup
And Emergency Response
Oregon Department of Environmental Quality
165 E. 7th Avenue, Suite 100
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Sign up for updates regarding DEQ's Cleanup and LUST Program here:
https://service.govdelivery.com/accounts/ORDEQ/subscriber/new?topic_id=ORDEQ_546