

State of Oregon
Department of Environmental Quality

Memorandum

Date: August 9, 2013

To: NWR Cleanup Section file

Through: Keith Johnson, Manager
NWR Cleanup Section

From: Rebecca Wells-Albers, Project Manager
DEQ NWR Cleanup Section

Subject: Proposed Conditional No Further Action and Certification of Completion
Farmington Texaco (Former) site
ECSI # 5546, LUST # 34-91-0083

Purpose

This memo provides a brief summary of the investigation and cleanup actions conducted at the Former Farmington Texaco site located at 13660 SW Farmington Road, in Beaverton, Oregon. The Oregon Department of Environmental Quality (DEQ) completed a review of the documents submitted by Tualatin Hills Park and Recreation District (THPRD) for the site under the State of Oregon/THPRD Prospective Purchaser Agreement (DEQ PPA No. 11-03) Consent Judgment, Case No. C11-2792CV (Washington County Circuit Court, May 31, 2011) entered into under ORS 465.327 (the "Consent Judgment"). Review of final closure documentation indicates that the remedial actions required under the terms of the Consent Judgment were satisfactorily performed and that the site does not pose a significant risk to human health or the environment as specified in OAR 340-122-0040. Therefore, DEQ determined that THPRD has met the obligations under the Consent Judgment and that issuance of a Certificate of Completion/Conditional No Further Action under ORS 465.200 for the site by the Director of DEQ is warranted. The basis for DEQ's determination and a summary of facts are summarized below.

The remedial action included the excavation and disposal of 552.37 tons of petroleum-impacted soil, and the extraction and disposal of approximately 4,500 gallons of petroleum-impacted groundwater. Given this work, a 30-day public notice and comment period will be conducted in accordance with Section 8 of the Consent Judgment PPA.

Background

A detailed summary of the site history including environmental investigations, the Analysis of Brownfield Cleanup Alternatives (ABCA), Record of Decision (ROD), Easement and Equitable Servitude (EES), and the selected remedy is available in the ECSI site file (#5546) and leaking underground storage tank (LUST) file (#34-91-0083).

The Former Farmington Texaco site is located at 13660 SW Farmington Road in Beaverton, Oregon. The property is bounded by Eichler Park to the west and south, SW Farmington Road to the north, and SW Menlo Road to the east (Figure 1). The property was previously used as a

retail petroleum fuel facility and automotive repair shop that operated from 1963 to 1993. Several environmental investigations performed on and near the property between 1991 and 2010 documented a release of petroleum including gasoline, diesel, heavy oil, polycyclic aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs) in soil, groundwater, and soil vapor above recreational park user, construction worker, and excavation worker risk-based concentrations (RBCs) promulgated by DEQ (see *Risk-Based Decision making for the Remediation of Petroleum-Contaminated Sites*, September 2003 and subsequently updated). The highest levels of petroleum contamination in soil and groundwater were found in subsurface soils (greater than three feet below ground surface [bgs]) at the former tank nest located on the northeast side of the property, in surface soils (0 to three feet bgs) at the former fuel island located on the north side of the property, and in subsurface soils at the former used oil underground storage tank located in the center of the property. Arsenic was also found above construction worker RBCs in the soil at the former used oil underground storage tank area.

Petroleum-impacted soil and soil vapor are confined to the property boundary; however petroleum contamination in shallow groundwater was estimated to extend 50 feet east-northeast into SW Farmington Road. Contaminant migration into surface water was not identified during previous site investigations. Therefore, risk to ecological receptors was not expected to occur.

In December, 2010 THPRD applied to DEQ for a Prospective Purchaser Agreement prior to acquiring the property as part of an expansion of Eichler Park. THPRD received assistance from Metro's Brownfield Program to conduct site investigation activities in preparation for purchase of the property. THPRD also received assistance from Business Oregon to plan for and conduct cleanup activities.

In February, 2011 Ash Creek Associates, on behalf of THPRD, submitted an ABCA containing a summary of all site information, risk screening using default DEQ RBCs and site-specific RBCs developed to evaluate future recreational uses, evaluation of possible corrective actions, and a recommendation for corrective action for the site. The ABCA contained all of the elements of a Corrective Action Plan as required by DEQ's LUST program.

Following a 30-day public comment period, DEQ issued a ROD on May 7, 2011 that specified the removal and remedial actions required to address petroleum contamination at the site. The actions included:

- Excavation and off-site disposal of surface soil containing levels of petroleum contamination above recreational park user RBCs.
- Excavation and off-site disposal of subsurface soil to a depth of 10 feet bgs in the northeast corner of the site. Prior to backfilling, application of an oxygen releasing compound was required in the excavation to facilitate contaminant reduction.
- Recording an institutional control with the property deed memorializing use of the site as a park, prohibiting use of groundwater, and requiring worker notification and/or protection measures for excavation workers who may encounter soil or groundwater contamination during site redevelopment activities.

- Abandonment of three site monitoring wells (MW-4, MW-5, MW-6) in accordance with Oregon Water Resources Department standards.

In May 2011, THPRD acquired the Former Farmington Texaco property. On June 3, 2011, THPRD filed an EES with the Washington County Circuit Court. The EES restricted the use of site groundwater and prohibited the construction of habitable structures on the property. The EES also required the development of a contaminated media management plan (CMMP) to protect future excavation and/or utility workers from petroleum impacted soil and groundwater, and provide appropriate management and disposal protocols of the contaminated material during future site work.

Remedial Actions

A Remedial Action Work Plan was submitted by Ash Creek Associates in September, 2012 and subsequently approved by DEQ. Remedial actions were completed at the site in October, 2012. In June, 2013, a Removal Action Report was submitted by APEX (formerly Ash Creek Associates) that discussed the remedial actions completed at the site.

As part of this work, monitoring wells MW-4 and MW-6 were abandoned in accordance with Oregon Water Resources Department rules by over-drilling and backfilling with bentonite. MW-5 could not be located and was presumed to have been destroyed during the construction of the engineered stormwater facility on the east side of SW Menlo Drive.

Approximately 50 yd³ of soil exceeding site-specific recreational park user RBCs were excavated to four feet bgs at the former fuel island located on the north side of the property. Confirmation samples were collected from the limits of the excavation and were below applicable RBCs (Figure 2 and Table 1). The area was backfilled with ¾-inch-minus crushed rock and compacted to match the existing site grade.

Soils exceeding the construction worker and excavation worker direct contact RBCs were excavated up to 11 feet bgs in the northeast corner of the property. A heavy sheen was observed when groundwater entered the excavation. Additional soil was removed from the excavation and the groundwater was pumped into holding tanks. No additional sheens were observed following dewatering. Confirmation samples were collected from the limits of the excavation, and at the soil-water interface at approximately 7.5 feet bgs. All soil samples were below applicable RBCs (Figure 3 and Table 1). Overburden soils from the excavation were sampled and found to be below screening levels allowed for site re-use. Soils from the Fanno Creek Bank Stabilization Project in Beaverton were also sampled and met DEQ Clean Fill criteria. Backfill soils from the site and the Fanno Creek project were placed in the bottom five feet of the excavation and amended with 300-pounds of Oxygen Release Compound Advanced® for long-term treatment of groundwater. The top five feet of the excavation was backfilled with ¾-inch-minus crushed rock and compacted to existing grade.

Approximately 550 tons of soil were disposed of at Riverbend Landfill in McMinnville, Oregon, and approximately 4,500 gallons of groundwater were disposed of at Bravo Environmental and Oil ReRefining in Portland, Oregon.

On June 21, 2013 APEX submitted a CMMP that presented protocols for soil and groundwater management and requirements for worker notification and environmental contractor oversight during future site maintenance and redevelopment activities. The CMMP was approved by DEQ on June 21, 2013.

Future Property Use and Residual Risk Assessment

THPRD plans to redevelop the property as an expansion to Eichler Park. Proposed redevelopment plans include a skate park, open lawn area, and landscaping.

Petroleum-impacted groundwater exceeding only excavation worker RBCs is present in shallow groundwater in the former UST nest area on the east and northeast side of the property, and likely extends into the southern right-of-way of SW Farmington Road (Figure 4). In completing excavation work in this area that may encounter groundwater, site representatives and excavation personnel must follow protocols presented in the CMMP which include: use of contractors with health and safety training, the proper disposal of groundwater, and notification to DEQ prior to the start of excavation work.

Petroleum-impacted soil remains on the property and must be managed in accordance with the CMMP. Figure 4 shows the location of the soil that is below applicable risk-based concentrations but is likely to exceed DEQ Clean Fill criteria. This soil must be disposed of in a Subtitle D landfill or another appropriate disposal facility if removed from the site. Concentrations of petroleum-contaminated soil generally increase with depth. If excavated for construction or other purposes, soil should be either returned to the depth where it was removed or disposed of as contaminated.

Work involving excavation and/or construction in the waste oil tank area, located at the center of the site at depth of 5-10 feet bgs, must be conducted under environmental contractor oversight due to elevated levels of arsenic.

Conclusion and Recommendations

DEQ has concluded that no further action is required at the Former Farmington Texaco site. Levels of petroleum-impacted soil remaining at the site are below DEQ RBCs for recreational park users and park workers. Risk to excavation workers associated with petroleum impacted groundwater in the former tank nest area and to construction workers from elevated levels of arsenic in the former waste oil tank area will be managed through adherence to the CMMP. Soil and groundwater management will also be conducted in accordance with the protocols presented in the CMMP.

Remedial actions performed at the site have been fully and satisfactorily completed in accordance with the 2010 PPA Consent Judgment and ROD. Upon approval of this closeout memorandum, DEQ will provide public notice and opportunity to comment on a proposed certification decision in accordance with ORS 465.320 and 465.325(10)(b) as specified in Section 8 of the Judgment. After consideration of any public comment, the Director of DEQ (or an authorized delegate) shall issue a final certification decision. The certification decision will

subsequently be submitted to the Washington County Circuit Court (Court). Subject to the jurisdiction of the Court under ORS 465.325(10)(c), the Consent Judgment shall then be deemed satisfied, and terminated upon filing of DEQ's Certification of Completion and payment by THPRD of all outstanding costs.

Figures

- Figure 1. Site Location Map
- Figure 2. Surface Soil Results Summary Map
- Figure 3. Subsurface Soil Results Summary Map
- Figure 4. CMMP Summary Map

Table

- Table 1. Soil Analytical Results from Removal Action

References

Record of Decision, Selected Remedial Action for the Former Farmington Texaco Site, ECSI # 5546, Beaverton, Oregon; DEQ, May 6, 2011.

Prospective Purchaser Agreement, Consent Judgment, State of Oregon, DEQ, plaintiff v. Tualatin Hills Park and Recreation District, defendant; DEQ, May 31, 2011.

Removal Action Work Plan, THPRD Farmington Road Texaco Cleanup, Beaverton, Oregon; APEX, September 19, 2012.

Removal Action Report, THPRD Farmington Road Texaco Cleanup, Beaverton, Oregon; APEX, June 21, 2013.

Contaminated Media Management Plan, THPRD Farmington Road Texaco Cleanup, Beaverton, Oregon; APEX, June 21, 2013.

DEQ Northwest Region Cleanup files, ECSI# 5546:

<http://www.deq.state.or.us/Webdocs/Forms/Output/FPController.ashx?SourceIdType=11&SourceId=5546&Screen=Load>.

DEQ NWR Cleanup files, ECSI# 5546.

DEQ NWR LUST files # 34-91-0083.