



ENVIRONMENTAL  
CONSULTANTS

PHASE I

ENVIRONMENTAL

SITE ASSESSMENT

## TRUCK STOP PROPERTY

251 WEST VALLEY VIEW ROAD  
TALENT, OREGON 97520

### PREPARED FOR

██████████ CREDIT UNION

██  
NEW YORK, NEW YORK, 10119

### PREPARED BY

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PROJECT NUMBER: **2019.377**

DATE: **JULY 31, 2019**

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## 1.0 EXECUTIVE SUMMARY

A3 Environmental, LLC (A3E) performed this *Phase I Environmental Site Assessment (ESA)* in conformance with the scope and limitations of The American Society for Testing and Materials (ASTM) Standard Practice for *Environmental Site Assessments: Phase I Environmental Site Assessment Process (E1527-13)*, the United States Environmental Protection Agency (USEPA) *All Appropriate Inquiry (40 CFR 312)*, for the Truck Stop Property located at 251 West Valley View Road in Talent, Jackson County, Oregon (hereinafter referred to as the *target property*). Any exceptions to, or deletions from, this process are described in Sections 2.7 and 8.4 of this report.

<b>Site Description</b>	
<b>Property Name</b>	Truck Stop Property
<b>Property Address</b>	251 West Valley View Road
<b>Historical/Additional Addresses</b>	None.
<b>City, County, State, Zip</b>	Talent, Jackson, County, Oregon, 97520
<b>Location</b>	The target property is located on the north side of West Valley Road and approximately 1,000 feet west of the on-ramp to I-5.
<b>Property Use</b>	Commercial
<b>Parcel Number(s)</b>	10977591, 10046945
<b>Size/Acres</b>	5.59
<b>Site/Building Information</b>	
<b>Number of Buildings</b>	2
<b>Square Footage</b>	Restaurant = 2,280 (Jackson County Tax Assessor) Truck Stop = 4,000 (Jackson County Tax Assessor)
<b>Date of Construction</b>	Restaurant = 1955 (Jackson County Tax Assessor) Truck Stop = 1977 (Jackson County Tax Assessor)
<b>Occupant/Hazardous Material Use</b>	The target property is currently occupied by Talent Truck Stop and Talent Truck Stop Restaurant. The property contains at least 2 10,000-gallon ASTs, a 250-gallon propane AST, stored 55-gallon drums and paints, and a 1,050 DEF AST.
<b>Vicinity Characteristics</b>	The adjoining properties consist of commercial and residential buildings. Outside of the adjoining properties, the area is primarily made up of additional similar sized commercial and residential buildings.
<b>Property Historical Summary</b>	
<b>Historical Use</b>	The current site conditions date back to approximately 1986 with Talent Truck Stop as the occupant. Prior to 1986, occupants are unknown. The <i>target property</i> buildings were constructed in 1955 (south building) and 1977 (north building). Prior to 1955, the <i>target property</i> is presumed to be vacant undeveloped land.
<b>Regulatory Listings</b>	The <i>target property</i> was listed on the AST, DTNK, ECSI, HAZMAT, HIST HAZMAT, HMIRS, SPILLS, and TIER 2 database. Refer to Section 4.3/4.4.

Adjoining Properties		
Direction	Tenant/Use (Address)	Regulatory Listings
North Adjoining	Vacant Land	None Identified
South Adjoining	Bramo Power/300 West Valley View Road	HSIS, RCRA CESQG, SPILLS, TIER 2 database listings. Refer to Section 4.3/4.4.
East Adjoining	Chevron Gas Station/301 West Valley Road	TIER 2 and UST database listing. Refer to Section 4.3/4.4.
West Adjoining	Residents/100-140 Oak Valley Drive	None Identified
Summary	It is A3E's opinion that these properties are not indicative of an environmental concern.	

## Findings/Conclusions

Recognized Environmental Condition (REC) is defined by ASTM Standard Practice E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a *target property*: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat or a future release to the environment.

- A pool of liquid was observed onsite in the AST transfer containment area. The liquid appeared to be a mixture of water and diesel fuel. The diesel fuel is presumably from leaks in the piping associated with the nearby ASTs. Staining was observed on the ground surrounding the containment area as well as on the outside of the containment concrete. Based on the amount of staining in and around the AST containment area, as well as the observed pool of liquid, it is A3E's opinion that this represents a REC to the *target property*.
- The *target property* was listed on the SPILLS and ECSI database for a release of approximately diesel fuel to the soil and possibly the nearby creek. According to a review documents made available online at the ODEQ ECSI website, the ODEQ was notified in June 2002 of a visible sheen on Bear Creek adjacent to the site. The source of the sheen was identified to be from leaking underground piping at the site. Cleanup measures were taken in the form of drilling test holes to determine the extent of contamination and pumping free product from the test holes using a pumper truck and absorbent pads. From June 25, 2002 to July 23, 2002, an approximated 2,000 gallons of diesel was recovered through these methods. The ODEQ informed Talent Truck Stop that additional investigations would be required. The Talent Truck Stop informed the ODEQ that they would conduct further environmental work independent of ODEQ oversight. No additional documents/work was performed until October 2016 when ODEQ was informed of additional sampling conducted in the area by AEI Consultants. Gasoline, diesel and heavier range hydrocarbons in the soil and groundwater were detected. ODEQ's response to the 2016 sampling event indicated that further assessment of the releases from above-ground diesel tank piping is required and that the nearby Wagner/Bear Creek and the soil between the creeks require further evaluation. Specifically, creek sediments need to be evaluated to allow for an ecological risk assessment. A3E spoke with the ODEQ on July 31, 2019, who informed A3E that the facility

is currently not a high priority but as resources allow, would be formally investigated by the ODEQ. Based on the known soil and groundwater impacts, it is A3E's opinion that this represents a REC to the *target property*.

Controlled Recognized Environmental Condition (CREC) is defined by the ASTM Standard Practice E1527-13 as a past release of hazardous substance or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

- A3E did not identify evidence of CRECs during the course of this assessment.

Historical Recognized Environmental Condition (HREC) is defined by ASTM Standard Practice 1527-13 as a past release of any hazardous substances or petroleum products that has occurred in connection with the *target property* and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

- A3E did not identify evidence of HRECs during the course of this assessment.

De Minimis Condition is defined as a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis conditions are not Recognized Environmental Conditions or controlled Recognized Environmental Conditions as defined by the ASTM Standard Practice 1527-13.

- Several drums were observed in the northern building. The contents of the drums were not ascertainable. All drums appeared to be in good condition with no evidence of spills or releases. Based on the condition of the drums, it is A3E's opinion that the presence of the drums is *de minimis*. However, based on the unknown use of the drums, it is A3E's opinion that the drums be removed to prevent any releases of hazardous substances at the *target property*.

Other Environmental Considerations warrant discussion, but do not qualify as RECs as defined by the ASTM Standard Practice 1527-13. These include, but are not limited to, business environmental considerations such as the presences of asbestos containing materials (ACMs), lead-based paints (LBPs), radon, mold and lead in drinking water, which can affect the liabilities and financial obligations of the client, the health and safety of site occupants, and the value and marketability of the *target property*.

- The east adjoining property was identified in the Historical Aerials and City Directories to be a gas station from at least 2002 until 2018. Additionally, the east adjoining property was listed in the UST database for containing four active USTs onsite. No further information was obtained regarding the age, contents, size or construction of the USTs onsite. However, no evidence of releases or spills from the tanks were identified. Based on the presence of the tanks and lack of information on the tanks, it is A3E's opinion that this represents a business risk to the *target property*.

**1.1 SIGNATURES AND ENVIRONMENTAL PROFESSIONAL STATEMENT**

**Site Assessor:**

*Kristopher Brenneman*

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Kristopher Brenneman  
Field Technician

**Senior Reviewer:**

*Alisa A. Allen*

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Alisa A. Allen, P. G.  
Senior Project Manager

The following personnel contributed to the preparation of this Phase I ESA under the direct charge of the environmental professional(s) signed below:

*Brian T. Englert*

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Brian T. Englert  
Environmental Scientist

**EP Certification:**

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in §312 of 40 CFR Part 312.

*Alisa A. Allen*

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Alisa A. Allen, P.G.  
Owner/Manager

**AAI Certification:**

I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the *property*. I have developed and performed the all appropriate inquires in conformance with the standards and practices set forth in 40 CFR 312.

*Alisa A. Allen*

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Alisa A. Allen, P.G.  
Owner/Manager





(B), §9607 (b) (3), §9607 (q), and §9607 (r)), assuming compliance with other elements of the defense.

- *Hazardous substances* – a substance defined as hazardous pursuant to CERCLA 42 USC § 9601 (14), and as interpreted by USEPA regulations and the courts.
- *Petroleum product* – those substances included within the meaning of the petroleum exclusion to CERCLA 42 USC § 9601 (14), as interpreted by the courts and USEPA, that is: petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under Subparagraphs (A) through (F) of CERCLA 42 USC § 9601 (14), natural gas, natural gas liquids, liquefied natural gas, and synthetic gas useable for fuel (or mixtures of natural gas and such synthetic gas).
- *Recognized Environmental Conditions*- the presence or likely presence of any hazardous substances or petroleum products in, on, or at a *target property*: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not Recognized Environmental Conditions.
- *Historical Recognized Environmental Conditions*– a past release of any hazardous substances or petroleum products that has occurred in connection with the *target property* and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the *target property* to any required controls (for example, *target property* use restrictions, activity and use limitations, institutional controls, or engineering controls). Before calling the past release a historical Recognized Environmental Condition, the environmental professional must determine whether the past release is a *Recognized Environmental Condition* at the time the Phase I ESA is conducted (for example, if there has been a change in the regulatory criteria).
- *Controlled Recognized Environmental Conditions*– a Recognized Environmental Condition *resulting* from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, *target property* use restrictions, activity and use limitations, institutional controls, or engineering controls).
- *De minimis condition* – a condition that generally does not present a threat to human health or the environmental and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis conditions are not Recognized Environmental Conditions or controlled Recognized Environmental Conditions.

## 2.4 SCOPE OF SERVICES

The assessment was based on visual assessment of the *target property*, a review of available land use records, interviews with subject site representatives, review of previous environmental reports and information from environmental agencies. The assessment is designed to provide an objective, independent, professional opinion of the potential environmental risks, if any, associated with the *target property*.

- Review of standard federal, state, tribal and local record sources, additional record sources, physical setting sources and standard historical sources. Historical sources include fire insurance maps, topographic maps, aerial photographs, city directories, and chain-of-title/environmental lien documents (if provided/available).
- Conduct a site visit of the *target property* to visually and/or physically observe exterior and interior conditions and physical characteristics. Identify current conditions and operations of the *target property* and surrounding properties. Visually assess the *target property* for evidence of RECs, CRECs, or HRECs, including RECs associated with Vapor Encroachment Conditions (VECs).
- Interview past and present owners, operators, and occupants of the *target property*; interview state, and local government officials for the purpose of obtaining information that may indicate Recognized Environmental Conditions in connection with the *target property*; anyone with available knowledge pertaining to the *target property*.
- Prepare a Phase I ESA report documenting the findings, opinions and conclusions.

## 2.5 ASSUMPTIONS

The following assumptions are made by A3E in this report. A3E relied on information derived from secondary sources including governmental agencies, the client, designated representatives of the client, property contact, property owner, property owner representatives, computer databases, and personal interviews. A3E has reviewed and evaluated the thoroughness and reliability of the information derived from secondary sources including government agencies, the client, designated representatives of the client, property contact, property owner, property owner representatives, computer databases, or personal interviews. It appears that all information obtained from outside sources and reviewed for this assessment is thorough and reliable. However, A3E cannot guarantee the thoroughness or reliability of this information.

Groundwater flow, unless otherwise specified by on-site well data or well data from the target property or nearby sites, is inferred from contour information depicted on the USGS topographic maps. A3E assumes the property has been correctly and accurately identified by the client, designated representative of the client, property contact, property owner, and property owner's representatives.

## 2.6 PROJECT-SPECIFIC LIMITATIONS

Performance of this assessment is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with the *target property*. This assessment was prepared in a manner consistent with generally accepted industry practices and standards. All information is true and correct to the best of A3E's knowledge and reflects our best professional opinion and judgment.

In performing this Phase I ESA, the following limitations exist:

- A Phase I ESA does not include the testing or sampling of the surface and subsurface soil, water, groundwater, air, or building materials located on the *target property*.
- A Phase I ESA is not intended to address environmental issues that are considered beyond the scope of a Phase I ESA, (e.g., asbestos-containing materials, radon, lead-based paint, wetland investigations) unless specifically requested by the *user* and included in Section 9.0.
- A Phase I ESA does not address whether requirements in addition to *all appropriate inquiries* have been met in order to qualify for the *landowner liability protections*. For example, a Phase I ESA does not address the duty to take reasonable steps to prevent releases, or the duty to comply with legally required release-reporting obligations. Additional requirements necessary to qualify for *landowner liability protections* are specified in USC § 9607(b)(3)(a) and (b) and cited in Appendix XI of ASTM E1527-13.
- This report contains information and opinions that are limited to the date the report was issued. No additional site reconnaissance activities, data review or other investigation of the *target property* have been performed by A3E since the date of this report. A3E makes no representation with respect to, nor expresses any opinion about, the *target property* after the date of the report. A3E does not assume any obligation to update this report for any purpose whatsoever.
- Performance of this Phase I ESA is intended to reduce, but not eliminate, uncertainty of environmental conditions associated with the *target property*. A3E is unable to represent that the *target property* or adjoining properties contain no hazardous waste, petroleum products, or other conditions beyond that detected or observed by A3E during Phase I ESA activities. The possibility for contaminants to migrate through surface and subsurface soil, water, groundwater or air always exists. The scope of this ESA cannot completely address the environmental risks associated with migration in these media.
- The ASTM standard and AAI do not impose on the environmental professional the responsibility to undertake a review of recorded land title records and judicial records for environmental liens and activity and use limitations unless specifically included as an additional scope of work item in the proposal and acceptance agreement.
- Site reconnaissance activities were performed with the intention to review areas that may present potential environmental conditions. A3E cannot assert that all areas of the *target property* presenting these conditions were reviewed during on-site activities.

## 2.7 LIMITING CONDITIONS/DEVIATIONS AND EXCEPTIONS

The performance of this Phase I ESA was limited by the following:

### **FOIAs**

Pursuant to ASTM Standard E1527 Section 7.1.4.2, information that is obtainable within a reasonable time frame is information that will be provided by the source within 20 calendar days of receiving a public information request. Based on the expected response time of over 20 calendar days for the Talent Building Department and the Talent Fire Department, records

from this agency are not considered reasonably ascertainable. When the files are made available to A3E, if the records review reveals any items of concern for the target property, an addendum to this report will be issued.

## 2.8 DATA GAPS AND DATA FAILURE

Data gaps occur when, despite good faith efforts, the consultant is unable to identify information required to satisfy objectives of the assessment. Data gaps may result from incompleteness in any of the activities required by the ESA Standard. The ESA Standard requires that data gaps be identified in the report when they significantly impact the ability of the consultant to identify Recognized Environmental Conditions at the *target property*. Limiting Conditions identified in this report are not considered to significantly impact our ability to satisfy the objectives of this assessment.

Data failure is one type of data gap. According to ASTM E1527-13, data failure occurs when all of the standard historical sources that are reasonably ascertainable and likely to be useful have been reviewed and yet the objectives have not been met. Pursuant to ASTM E1527-13, historical sources are required to document property use back to the property's first developed use or back to 1940, whichever is earlier, or periods of five years or greater.

### 2.8.1 DATA FAILURE

Data failure was encountered during completion of our assessment.

- The earliest research date was 1951, after the ASTM identified research year of 1940. Because of the environmentally sensitive operations of the target property and east adjoining property, this data failure may significantly limit the ability to identify Recognized Environmental Conditions in connection with the *target property*.
- The *target property* was not undeveloped at the earliest research year, 1951. Because of the environmentally sensitive operations of the target property and east adjoining property, this data failure may significantly limit the ability to identify Recognized Environmental Conditions in connection with the *target property*.
- Research intervals greater than five years were encountered within the reviewed historical sources. Because of the environmentally sensitive operations of the target property and east adjoining property, this data failure may significantly limit the ability to identify Recognized Environmental Conditions in connection with the *target property*. This data failure constitutes a data gap.

### 2.8.2 DATA GAP

No significant data gaps were encountered during completion of this assessment.

## 2.9 SPECIAL TERMS AND CONDITIONS

This Phase I ESA was completed in accordance with the acceptance agreement authorized by [REDACTED] Credit Union and subject to the noted terms, conditions, and limitations.

Per Section 6.2 of ASTM E1527-13, “Unless added by a change in the scope of work to be performed by the environmental professional, this practice does not impose on the environmental professional the responsibility to undertake a review of recorded land title

records and judicial records for environmental liens and AULs. The user should either (1) engage a title company, real estate attorney, or title professional to undertake a review of reasonably ascertainable recorded land title records and lien records for environmental liens and AULs currently recorded against or relating to the *target property*, or (2) negotiate such an engagement of a title company, real estate attorney, or title professional as an addition to the scope of work to be performed by the environmental professional.”

## **2.10 USER RELIANCE**

This assessment and report was prepared on behalf and for the exclusive use of [REDACTED] Credit Union (*user*), and its agents, and attorneys. The report and its findings shall not, in whole or in part, be disseminated or conveyed to another party, nor used by another party in whole or in part, without prior written consent by A3 Environmental, LLC, except as permitted by the ASTM standard.

### 3.0 USER PROVIDED INFORMATION

User provided information is intended to help identify the possibility of RECs in connection with the *target property*. According to ASTM E1527-13 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), certain items should be researched by the *user*, and the results of such inquiries be provided to the Environmental Professional. The responsibility for qualifying for CERCLA limited liability protection (LLP) by conducting the inquiries ultimately rests with the *user* and providing the information to the Environmental Professional. When not provided, the missing information must be considered as a possible data gap. Information required to be provided by the *user* includes:

- Research into the existence of environmental cleanup liens and Activity and Use Limitations
- Any specialized knowledge or experience of the "user"
- Commonly known or reasonably ascertainable information about the property
- Relationship of the purchase price to fair market value, and
- The degree of obviousness of the presence or likely presence of contamination.

The *user*, as defined by ASTM E1527-13, is “ the party seeking to use Practice E1527-13 to complete an environmental site assessment of the *target property*. A *user* may include, without limitation, a potential purchaser of *property*, a potential tenant of *property*, an owner of *property*, a lender, or a *property* manager.

██████████ Credit Union/ ██████████ is identified as the *user* of this ESA.

██████████, representative of User, completed the User Questionnaire to assist A3E with identifying the presence of Recognized Environmental Conditions in connection with the *target property*. A copy of the completed questionnaire and other documents provided by the User are included in Appendix D and summarized below.

#### 3.1 DOCUMENTS PROVIDED BY THE USER

Document	Not Provided	No Knowledge	Knowledge Provided
Environmental Liens or AULs		✓	
Specialized Knowledge		✓	
Valuation Reduction for Environmental Issues		✓	
Commonly known or reasonably ascertainable information		✓	
Obvious Indicators of Releases		✓	
Title Records	✓		
Previous Reports	✓		

## 4.0 RECORDS REVIEW

The records review was performed to obtain and review reasonably ascertainable government records from standard sources to assist in identifying recognized environmental concerns in connection with the *target property*.

### 4.1 PHYSICAL SETTING SOURCE

#### 4.1.1 TOPOGRAPHY

Description	Findings
<b>USGS Topographic Map</b>	Talent, OR; Medford, OR 2017
<b>Property Elevation</b>	1,568.63 feet above mean sea level
<b>Configuration</b>	Relatively flat with a slight slope to the northeast
<b>Surface Water</b>	Bear Creek is located approximately 75 feet to the northeast
<b>Gradient</b>	North-northeast towards Bear Creek
<b>Estimated Depth to Groundwater</b>	Not ascertained

#### 4.1.2 GEOLOGY

Description	Findings
<b>Soils</b>	Newberg fine sandy loam, well-drained
<b>Quaternary Deposits</b>	Alluvial deposits
<b>Bedrock</b>	Holocene-aged sand and gravel

### 4.2 STANDARD ENVIRONMENTAL RECORDS REVIEW

A3E contracted Environmental Risk Information Services (ERIS) to conduct a search of publicly available information from federal, state, tribal, and local databases containing known and suspected sites of environmental contamination and sites of potential environmental significance. Location information for listed sites is designated using geocoded information provided by federal, state, or local agencies and commonly used mapping databases with the exception of "Unmapped" sites. Poor or inadequate address information prohibits the ability of the site to be geocoded/mapped by ERIS, thus, information is provided based upon vicinity zip codes, city name, and state. A copy of the regulatory database report is included in Appendix C.

### 4.3 FEDERAL STANDARD DATABASE REVIEW

Database Type	Minimum Search Distance (miles)	Total Sites Identified	Target Property	Adjacent Property	REC (Yes/No)
RCRA TSDF	0.5	0	0	0	
Archived RCRA TSDF	0.5	0	0	0	
CERCLIS NFRAP	0.5	0	0	0	
CERCLIS - HIST	0.5	0	0	0	
Federal Facility	1.0	0	0	0	
SEMS 8R Active	0.5	0	0	0	
SEMS 8R Archived	0.5	0	0	0	
CORRACTS	1.0	0	0	0	
Delisted NPL	1.0	0	0	0	
Proposed NPL	1.0	0	0	0	
NPL	1.0	0	0	0	
NPL Liens	Target Property	--	0	0	
RCRA-CESQG	0.25	1	0	1	No
RCRA - LQG	0.25	0	0	0	
RCRA - SQG	0.25	0	0	0	
Engineering Control	0.5	0	0	0	
Institutional Control	0.5	0	0	0	
ERNS	Target Property	--	0	--	

#### 4.3.1 FEDERAL - TARGET PROPERTY

The *target property* was not identified in the federal databases reviewed.

#### 4.3.2 FEDERAL - ADJOINING PROPERTIES

The south adjoining property was identified in the RCRA CESQG federal database, and is discussed below.

<b>Site Name:</b>	Walmart Store #2069
<b>Site Address:</b>	300 West Valley View Road
<b>Distance:</b>	109.11 feet
<b>Direction:</b>	South-southeast
<b>Elevation:</b>	Higher than the <i>target property</i>
<b>Comments:</b>	RCRA CESQG: The RCRA CESQG database list conditionally exempt small quantity



	hazardous waste generators that generate more than 1 kg but less than 100 kgs of waste per month. The south adjoining property is listed in this database as a used oil generator. A notice of non-compliance was received on July 11, 2011 and return to compliance was received on August 8, 2011. Based on the provided return to compliance date and no additional violations, it is A3E's opinion that this listing is not indicative of a <i>Recognized Environmental Condition</i> .
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#### 4.3.3 FEDERAL - SURROUNDING PROPERTIES

In determining if a listed site is a potential environmental concern to the *target property*, A3E generally applies the following criteria to classify the site as a lower potential environmental concern:

- The site only holds an operating permit (which does not imply a release),
- The site's distance from, and/or topographic position relative to, the *target property*,
- The site has recently been granted "No Further Action" by the appropriate regulatory agency.

No surrounding properties were identified on the federal database that would be indicative of a Recognized Environmental Condition based on the above criteria.

#### 4.4 STATE AND TRIBAL STANDARD DATABASE REVIEW

State Database Type	State Record Database	Minimum Search Distance (miles)	Total Sites Identified	On Target Property	On Adjoining Property	REC (Yes/No)
<b>Landfill and/or Solid Waste Landfill Sites</b>	SWF/LF	0.5	0	0	0	
<b>Leaking Underground Storage Tank Lists</b>	LUST	0.5	7	0	7	No
	LUST Trust	0.5	0	0	0	
	Indian LUST	0.5	0	0	0	
<b>Registered Underground Storage Tank Lists</b>	UST	0.25	2	0	2	
	Indian UST	0.25	0	0	0	
	FEMA UST	0.25	0	0	0	
	AST	0.25	2	1	0	No
<b>Institutional Control/ Engineering Control Registries</b>	Engineering Controls	0.5	0	0	0	
	Institutional Controls	0.5	0	0	0	
<b>Voluntary Cleanup Sites</b>	VCP	0.5	0	0	0	
	Indian VCP	0.5	0	0	0	
<b>Brownfield Sites</b>	Brownfields	0.5	0	0	0	

#### 4.4.1 STATE - TARGET PROPERTY

The *target property* was identified in the AST State database, and is discussed below.

<b>Site Name:</b>	Verizon Wireless- Talent (ID: 1459375)
<b>Site Address:</b>	251 West Valley View Road
<b>Distance:</b>	<i>Target property</i>
<b>Direction:</b>	<i>Target property</i>
<b>Elevation:</b>	<i>Target property</i>
<b>Comments:</b>	AST: The <i>target property</i> is listed on this database for an above ground storage tank containing propane. Given the properties of propane at regular atmospheric pressure it is This is discussed further in Section 4.7.

#### 4.4.2 STATE - ADJOINING PROPERTIES

The east adjoining property was identified in the UST State database, and is discussed below.

<b>Site Name:</b>	Talent Chevron Circle K
<b>Site Address:</b>	301 West Valley View Road
<b>Distance:</b>	186.75 feet
<b>Direction:</b>	Southeast
<b>Elevation:</b>	Same as <i>target property</i>
<b>Comments:</b>	UST: The east adjoining property is listed in the UST database for containing four active tanks onsite. No further information is provided by the database listing. This finding is discussed further in Section 8.1.

#### 4.4.3 STATE - SURROUNDING PROPERTIES

In determining if a listed site is a potential environmental concern to the *target property*, A3E generally applies the following criteria to classify the site as a lower potential environmental concern:

- The site only holds an operating permit (which does not imply a release),
- The site's distance from, and/or topographic position relative to, the *target property*,
- The site has recently been granted "No Further Action" by the appropriate regulatory agency.

No surrounding properties were identified on the state database that would be indicative of a Recognized Environmental Condition based on the above criteria.

#### 4.5 ADDITIONAL FEDERAL, STATE, TRIBAL AND LOCAL ENVIRONMENTAL RECORD SOURCES

ERIS also provided a search of additional federal and state databases. The list of records that were searched by ERIS can be reviewed in Appendix D.

The *target property* was identified on the ECSI, DTNK, FINDS/FRS, HMIRS, HIST HAZMAT, HAZMAT, SPILLS, TIER 2 database and discussed below.

<b>Site Name:</b>	Talen Truck Stop Inc, Consolidated Freight, ANR Freight System, IAT Distributors
<b>Site Address:</b>	251 Valley View Road
<b>Distance:</b>	<i>Target property</i>
<b>Direction:</b>	<i>Target property</i>
<b>Elevation:</b>	<i>Target property</i>
<b>Comments:</b>	ECSI: The ECSI database is a list of properties that have had environmental cleanups conducted onsite. The <i>target property</i> is listed on this database for a diesel fuel cleanup.

	<p>According to the database listing, the onsite diesel ASTs failed two pipe pressure tests in June 2002 and approximately 2,000 gallons of diesel was collected from on-site trenches between June and September 2002. Mitigation activities took place; however, the status and extent of the contamination was not known as of June 2005 and further investigation was warranted by the ODEQ. The listing also states that a diesel odor and sheen were observed on the nearby Bear Creek. Sampling was conducted in 2016 and identified diesel and heavier range hydrocarbons in the soil and groundwater at the site. However, the investigation did not assess the connection between contamination at the site and the fuel seen in previous years in the adjacent creek. This is discussed further in Section 4.7.</p> <p>DTNK: This database contains a list of closed storage tank sites that were removed from the Oregon Department of Environmental Quality. This listing indicates that the business type related to this listing is 'gas station diesel only.' Additionally, the listing states that the 'original source' of the listing is AST, indicating that the tank(s) present onsite were aboveground storage tanks.</p> <p>FINDS/FRS: The target property is listed in this database. This database manages identifies facilities, sites or places subject to environmental regulations or of environmental interest.</p> <p>HMIRS: This database is the Hazardous Materials Information Reporting System, an incidents report database taken from Hazmat intelligence Portal. A hazardous material incident was reported on 3/10/1996 involving a 350-gallon tote bin that had a valve leaking enamel paint. The leak was contained by hazmat team and fire department. First Strike Environmental was contracted to clean up spillage from the ground and inside the trailer. First Strike Environmental received authority to dispose of contaminates at the local land fill. Based on cleanup and proper disposal of the impacted material, it is A3E's opinion that this listing is not indicative of a <i>Recognized Environmental Condition</i>.</p> <p>HIST HAZMAT/HAZMAT: The <i>target property</i> is listed on the Historical Hazardous Materials Incident Reports with an incident involving leaking sealant from a 350-gallon CARB, a spill of stripping paint, a diesel fuel leak from a blown motor and a leak of a corrosive material. All spills/leaks were identified to have been contained and/or of small amounts ranging from 2-10 gallons. Based on containment of spills and amounts of materials spilled, the <i>target property</i> listings in the HIST HAZMAT and HAZMAT databases are not indicative of a <i>Recognized Environmental Condition</i>.</p> <p>SPILLS: The <i>target property</i> was listed on the SPILLS database for a release of approximately 100 gallons of diesel fuel to the soil. No indication of the cause or containment and cleanup methods were listed in the SPILLS database. This is discussed further in 4.7.</p> <p>TIER 2: The TIER 2 database is a list of facilities that have submit a chemical inventory to the state for filing. The <i>target property</i> submit a TIER 2 list including diesel ASTs. Based on the provided information, it is A3E's opinion that the <i>target property</i> listing in the TIER 2 database is not indicative of a <i>Recognized Environmental Condition</i>.</p>
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The south adjoining property was identified on the HSIS, SPILLS and TIER 2 databases and is discussed below.

<b>Site Name:</b>	Brammo Inc.
<b>Site Address:</b>	300 W Valley View Road
<b>Distance:</b>	South adjoining property
<b>Direction:</b>	South
<b>Elevation:</b>	Up gradient from the <i>target property</i>
<b>Comments:</b>	<p>HSIS/TIER 2: These databases are lists of properties that store hazardous substances or have submit chemical inventory lists to the State of Oregon. Based on the nature of the listings, it is A3E's opinion that these listings are not indicative of a <i>Recognized Environmental Condition</i>.</p> <p>SPILLS: The south adjoining property is listed in this database for a spill of an unknown</p>

	material in January 2002. The source of the release is listed as unknown and its status is listed as archived. Based on no indicators of contamination or hazardous substances spilled, it is A3E's opinion that this listing is not indicative of a <i>Recognized Environmental Condition</i> .
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#### 4.6 UNMAPPED SITE SUMMARY

Unmapped Sites are properties for which a geographic location cannot be pinpointed because of insufficient information on the address. Four Unmapped sites were identified in the database search. It does not appear that the unmapped sites listed in the database report are indicative of Recognized Environmental Conditions at the *target property* based on review of limited descriptions provided in the report.

#### 4.7 REGULATORY AGENCY FILE AND RECORDS REVIEW

In accordance with the ASTM Standard, if the *target property* or any of the adjoining properties is identified on one or more of the standard environmental record sources, a regulatory file and records review should be conducted, unless it is the environmental professional's opinion that such a review is not warranted.

The *target property* was identified within the ECSI database. A3E reviewed documentation online at the Oregon ECSI website. The following documents were available for review:

- February 8, 2006 File Review Letter and October 15, 2002 Interm Report. These documents provided a background of the site stating the following: In June 2002, the DEQ received a report of a visible sheen on Bear Creek adjacent to the site. The source of the sheen was identified to be from leaking underground piping at the site. Cleanup measures were taken in response in the form of drilling test holes to determine the extent of contamination and pumping free product from the test holes using a pumper truck and absorbent pads. According to the Interm Report, from June 25, 2002 to July 23, 2002, an approximated 2,000 gallons of diesel was recovered through these methods. The Talent Truck Stop informed the ODEQ that they would conduct further environmental work independent of ODEQ oversight.
- October 2016: ODEQ notes pertaining to the ECSI listing indicated that sampling was performed in the area by AEI Consultants. Gasoline, diesel and heavier range hydrocarbons in the soil and groundwater were detected. ODEQ's response to the 2016 sampling event indicated that further assessment of the releases from above-ground diesel tank piping is required and that the nearby Wagner/Bear Creek and the soil between the creeks require further evaluation. Specifically, creek sediments need to be evaluated to allow for an ecological risk assessment.

Copies of the documents are provided in Appendix E.

#### 4.8 VAPOR ENCROACHMENT CONDITIONS

As part of this assessment, A3E completed a Tier 1 Screening, as described in ASTM E2600-15 'Standard Guide for Vapor Encroachment Screening on a Property Involved in Real Estate Transactions'. This screening is designed to determine if potential onsite or offsite hazardous substances or petroleum products in the vapor phase have migrated to cause a Vapor Encroachment Condition (VEC) at the *target property*.

The Tier 1 Screening is based entirely upon information discovered during completion of this Phase I ESA and is intended to solely aid in the identification of Recognized Environmental Conditions.

Based on A3E's review of available information, a known or suspect release of hazardous substances or petroleum products to soil or groundwater has been identified at the target property, adjoining or nearby properties, which could result in a VEC.

The *target property* was identified to have had a release of diesel from underground piping associated with the ASTs present onsite. The amount of diesel released was unknown, however, approximately 2,000 gallons of diesel was estimated to have been recovered from the soil. The amount of soil estimated to have been released into the soil represents a VEC.

An ASTM E 2600-10 Tier 1 assessment has not been requested for inclusion to this report and is beyond the scope of this ASTM E 1527-13 Phase I Environmental Site Assessment.

## 5.0 HISTORICAL REVIEW

The objective of consulting historical sources is to develop a history of the previous uses of the *target property* and surrounding area, in order to help identify the likelihood of past uses having led to Recognized Environmental Conditions in connection with the *target property*.

Per the ASTM, Standard historical sources include aerial photographs, fire insurance maps, property tax files, recorded land title records, USGS topographic maps, local street directories building department records, zoning/land use records and other historical sources. A3E performed a review of reasonably ascertainable standard historical sources back to the *target property's* first developed use, or back to 1940, whichever is earlier. Copies of available historical sources are included in the Appendix.

### 5.1 TARGET PROPERTY

Year	Historical Source	Target Property	REC
1951, 1954, 1967, 1976, 1985, 1994, 2003, 2005, 2006, 2009, 2011, 2012, 2014, 2016	Aerial Photographs	1951-1954: The target property appears to be vacant/undeveloped land.  1967-1976: The target property appears to be developed with at least one structure.  1985-2016: The target property appears to be fully developed in its current configuration with at least two structures visible.	Possible gasoline pump island canopy identified on the 1985-2016 aerial photographs. Refer to Section 8.0 for further details.
1964, 1971, 1976, 1980, 1986, 1990, 1995, 1998, 2002, 2005, 2009, 2014, 2018	City Directories	251 West Valley Road:  1964-1980: Address not listed  1986-2018: Talent Truck Stop	Truck Stop Gas Station identified in the years 1986-2018. Refer to Section 8.0 for further details.

### 5.2 ADJOINING PROPERTIES

#### North Adjoining

Year	Historical Source	Comments	REC
1951, 1954, 1967, 1976, 1985, 1994, 2003, 2005, 2006, 2009, 2011, 2012, 2014, 2016	Aerial Photographs	1951-1967: The north adjoining property appears to be developed as agricultural land.  1976-2016: The north adjoining property appears to be vacant.	None Identified
1964, 1971, 1976, 1980, 1986, 1990, 1995, 1998, 2002, 2005, 2009, 2014, 2018	City Directories	Vacant Land:  1964-2018: Address not listed	None Identified

#### South Adjoining

Year	Historical Source	Comments	REC
1951, 1954, 1967, 1976, 1985, 1994, 2003, 2005,	Aerial Photographs	1951-1967: The south adjoining property appears to be developed as agricultural land.	None Identified

2006, 2009, 2011, 2012, 2014, 2016		1976-1985: The south adjoining property appears to be vacant.  1994-2016: The south adjoining property appears to be fully developed in its current configuration with at least one main structure visible.	
1964, 1971, 1976, 1980, 1986, 1990, 1995, 1998, 2002, 2005, 2009, 2014, 2018	City Directories	300 West Valley Road:  1995-2009: Walmart  2014: Coinstar  2018: Brammo Inc., Coinstar, HR Block	None Identified

### West Adjoining

Year	Historical Source	Comments	REC
1951, 1954, 1967, 1976, 1985, 1994, 2003, 2005, 2006, 2009, 2011, 2012, 2014, 2016	Aerial Photographs	1951-1985: The west adjoining property appears to be developed as agricultural land.  1994-2003: The west adjoining property appears to be vacant.  2005-2016: The west adjoining property appears to be fully developed in its current configuration with several structure visible.	None Identified
1964, 1971, 1976, 1980, 1986, 1990, 1995, 1998, 2002, 2005, 2009, 2014, 2018	City Directories	100-140 Oak Valley Drive:  1964-2018: Address not listed	None Identified

### East Adjoining

Year	Historical Source	Comments	REC
1951, 1954, 1967, 1976, 1985, 1994, 2003, 2005, 2006, 2009, 2011, 2012, 2014, 2016	Aerial Photographs	1951-1967: The east adjoining property appears to be developed as agricultural land.  1976: The east adjoining property appears to be vacant.  1985-1994: The east adjoining property appears to be developed with one or two structures.  2003-2016: The east adjoining property appears to be fully developed in its current configuration with at least 3 structures visible.	Possible gasoline pump island canopy identified within the 2003-2016 aerial photographs. Refer to Section 8.0 for further details.
1964, 1971, 1976, 1980, 1986, 1990, 1995, 1998, 2002, 2005, 2009, 2014,	City Directories	301 West Valley Road:  2002: Prestige Stations  2005: AMPM Mini Mart	Gas Station identified on the 2002, 2005, 2000, 2014, and 2018 city directories.

2018		2009: Talent Arco Gas Service Station 2014-2018: Talent Chevron Gas Station	
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**5.3 PROPERTY TAX FILES**

*Property* tax files were obtained from the Jackson County Assessor’s online database. Available tax files list the property under a parcel index number (PIN) of 10977591 and 10046945. The files list commercial land improvements including the square footage of the property buildings, its construction type, and the year of construction. Specifics of this information can be referenced in the executive summary or in Section 6.0. The property has a listed class of 201 and a stat class of 560. No additional information was ascertained.

**5.4 RECORDED LAND TITLE RECORDS**

Recorded land title records may include historical fee ownership such as leases, land contracts, and AULs.

█ Credit Union did not provide recorded land title records to A3E for review. Recorded land title records were not provided by the *user*. An independent review of land title information was not conducted by A3E.

**5.5 BUILDING DEPARTMENT RECORDS**

As part of the Phase I ESA, A3E requested building department records from Talent. At the time of this report, Talent had not yet responded to the request for information. In accordance with Sections 8.1.4 and 8.1.5 of the ASTM Standard, this information will be considered not *reasonably ascertainable* if not provided within 20 calendar days. Any information received within 20 calendar days will be reviewed by A3E. If any of the information has a significant impact on the findings and opinions of this report, A3E will issue an addendum as soon as practical.

**5.6 ZONING/LAND USE RECORDS**

Zoning/Land Use Records for the *target property* were reviewed online at the Talent website. According to the zoning map, the *target property* is zoned GC, County Wide General Commercial District.

**5.7 OTHER HISTORICAL SOURCES**

Other historical sources may include, but is not limited to, miscellaneous maps, newspaper archives, internet sites, community organizations, local libraries, historical societies, current owners or occupants of neighboring properties, or records in the files and/or personal knowledge of the *target property* owner and/or occupants.

No other historical sources were identified and/or reviewed.



## 6.0 SITE RECONNAISSANCE

The *target property's* location is depicted on Figure 1. The land use of the *target property* and land use of the adjoining properties is depicted on Figure 2. Photographs of the *target property* and surrounding properties are included in Appendix A.

### 6.1 METHODOLOGIES AND LIMITING CONDITIONS

The site inspection included visual observation of the *target property*, *target property* boundaries, and adjoining properties to document and/or identify evidence of Recognized Environmental Conditions.

The site inspection was conducted by inspecting interior and exterior structures on the *target property*, walking the *target property* boundaries and viewing adjoining properties from public right-of-ways. The site visit was conducted by walking the perimeter of the *target property* and buildings on the *target property*, and also by viewing the *target property* from adjacent public thoroughfares. Adjoining properties were viewed from locations on the *target property* or public right-of-ways.

<b>Site Reconnaissance Date:</b>	July 19, 2019
<b>Site Assessor(s)</b>	Kristopher Brenneman under the direct supervision of Alisa Allen (an Environmental Professional at A3E)
<b>Escort/Relationship to Target Property</b>	██████████ Manager of Talent Truck Stop
<b>Areas Observed</b>	All areas except the Restaurant building.
<b>Areas Not Observed/Reason</b>	The restaurant building was unable to be observed as ██████ did not have a key.
<b>Weather</b>	Sunny, dry, 75 degrees Fahrenheit

There were no significant limiting conditions encountered during the site visit.

### 6.2 GENERAL SITE SETTING

#### 6.2.1 CURRENT USE(S) OF THE PROPERTY

The *target property* is located at 251 West Valley View Road in Talent, Jackson County, Oregon. The *target property* is currently occupied by Talent Truck Stop and Talent Truck Stop Restaurant.

Site Improvements	
<b>Acres</b>	5.59
<b>Property Type</b>	Commercial
Building Information	
<b>Number of Buildings</b>	Two
<b>Year of Construction</b>	Restaurant = 1955 (Jackson County Tax Assessor)

	Truck Stop = 1977 (Jackson County Tax Assessor)
<b>Number of Stories</b>	Restaurant = 1 Story Truck Stop = 2 Stories
<b>Basement or Subgrade Area(s)</b>	Slab on grade
<b>Number of Units</b>	Two. Unit 1 = Restaurant Unit 2 = Talent Truck Stop
<b>Building Area/Source</b>	Restaurant = 2,280 (Jackson County Tax Assessor) Truck Stop = 4,000 (Jackson County Tax Assessor)
<b>Building Description</b>	Restaurant Construction: Wood frame with stucco siding and wood roof Truck Stop Construction: Metal frame with metal siding and steel roof Truck Stop Interior: Painted drywalls, drywall ceiling, and wood laminate flooring
<b>Building Occupant</b>	Talent Truck Stop and Talent Truck Stop Restaurant
<b>Current Onsite Operations</b>	The target property is currently occupied by Talent Truck Stop and Talent Truck Stop Restaurant. The property contains at least two 12,000-gallon ASTs, a 250-gallon propane AST, stored 55-gallon drums and paints, and a 1,050 DEF AST.
<b>Access and Utilities</b>	
<b>Access/Egress</b>	The <i>target property</i> is accessed from West Valley View Road to the south of the property.
<b>Parking</b>	Asphalt parking is available on the east and west sides of the building.
<b>Sewage Disposal</b>	A municipal sanitary sewage system services domestic waste generated at the <i>target property</i> .
<b>Potable Water</b>	Potable water is supplied through a municipal water system.
<b>Heating System</b>	The truck stop building is heated with a natural gas furnace located in the storage area of the buildings. The restaurant building heating system is unknown.
<b>Cooling System</b>	The buildings are cooled with electrical air-conditioning units located on the exterior portions of the property.

## 6.2.2 CURRENT USES OF THE ADJOINING PROPERTIES AND SURROUNDING AREAS

The *target property* is located within a mixed commercial and residential area. During the site inspection, A3E observed the following land use on adjoining properties.

Direction	Occupant	Land Use	REC
<b>North</b>	Vacant Land	Vacant land	None Identified
<b>South</b>	Bramo Power/300 West Valley View Road	Commercial	None Identified
<b>East</b>	Chevron Gas Station/301 West Valley Road	Commercial	The east adjoining property is identified as a gas station. Refer to Section 8.0 for further details.

<b>West</b>	Residents/100-140 Oak Valley Drive	Residential	None Identified
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### 6.3 EXTERIOR OBSERVATIONS

During the site investigation, A3E observed the exterior features of the *target property* for environmental conditions (past or present) that may be indicative of Recognized Environmental Conditions. If a condition was observed, a detailed explanation of the condition and possible impact to the *target property* is discussed. The following table summarizes the findings from the site visit.

Observed	Not Observed	Environmental Condition	REC
✓		Hazardous substances and petroleum products in connection with identified uses	No
✓		Storage Tanks	REC
	✓	Odors	
✓		Pools of Liquid	REC
✓		Drums	No
	✓	Hazardous substances and petroleum products containers (not in connection with identified uses)	
✓		Polychlorinated biphenyls (PCBs)	
	✓	Pits, ponds, or lagoons	
✓		Stained soil or pavement	REC
	✓	Stressed vegetation	
✓		Solid Waste Disposal/Evidence of Fill Materials	No
✓		Wastewater (including stormwater) discharges (drains, ditches, underground injection systems)	No
	✓	Wells (including dry wells, irrigation wells, injection wells, abandoned wells, or other wells)	
	✓	Septic Systems	
	✓	Other Environmental Conditions	

#### Hazardous Substances and Petroleum Products in Connection with Identified Uses

A 55-gallon drum of degreaser was identified on the north side of the north building. The drum was identified to contain Castrol Super Clean degreaser. The drum appeared to be in good condition with no evidence of leaks or spills. Based on the condition of the drum and no evidence of leaks or spills, it is A3E's opinion that the presence of the drum is not indicative of a *Recognized Environmental Condition*.

### **Storage Tanks**

Two diesel ASTs were observed on the *target property* in the northern portion. The ASTs were constructed of steel and 12,000-gallons in size. Both ASTs were situated in an approximately 4-foot tall containment berm with a transfer area for filling. The transfer area was also situated in an approximately 3-foot tall containment berm. The AST containment berm did not appear to have any releases or spills within it. A pool of liquid was observed onsite in the AST transfer containment area. The liquid was identified to be a mixture of water and diesel fuel. The diesel fuel is presumably from leaks in the piping associated with the nearby ASTs. Staining was observed on the ground surrounding the containment area as well as on the outside of the containment concrete. This finding is discussed further in Section 8.1.

### **Pools of Liquid**

A pool of liquid was observed onsite in the AST transfer containment area. The liquid was identified to be a mixture of water and diesel fuel. The diesel fuel is presumably from leaks in the piping associated with the nearby ASTs. Staining was observed on the ground surrounding the containment area as well as on the outside of the containment concrete. This finding is discussed further in Section 8.1.

### **Drums**

A 55-gallon drum of degreaser was identified on the north side of the north building. The drum was identified to contain Castrol Super Clean degreaser. The drum appeared to be in good condition with no evidence of leaks or spills. Based on the condition of the drum and no evidence of leaks or spills, it is A3E's opinion that the presence of the drum is not indicative of a *Recognized Environmental Condition*.

### **Polychlorinated Biphenyls (PCBs)**

Toxic PCBs were commonly used historically in electrical equipment such as transformers, fluorescent lamp ballasts, and capacitors. According to United States EPA regulation 40 CFR Part 761, there are three categories for classifying such equipment: <50 ppm of PCBs is considered "Non-PCB"; between 50 and 500 ppm is considered "PCB-Contaminated"; and >500 ppm is considered "PCB-Containing". Pursuant to 15 U.S.C. 2605(e)(2)(A), the manufacture, process, or distribution in commerce or use of any polychlorinated biphenyl in any manner other than in a totally enclosed manner was prohibited after January 1, 1977.

### **Transformers**

The management of potential PCB-containing transformers is the responsibility of the local utility or the transformer owner. Actual material samples need to be collected to determine if transformers are PCB-containing.

Transformers installed prior to 1977 may be PCB containing while transformers installed after 1977 are unlikely to be PCB containing. Federal Regulations (40 CFR 761 Subpart G) require any release of material containing >50 ppm PCB and occurring after May 4, 1987, be cleaned up by the transformer owner following the United States EPA's PCB spill cleanup policy.

One pole-mounted transformer was observed on the target property. A3E did not observe evidence of spills, staining, or leaks on or around the transformer. Based on the good condition of the equipment, it is A3E's opinion that the transformer is not indicative of a *Recognized Environmental Condition*.

**Stained Soil or Pavement**

A pool of liquid was observed onsite in the AST transfer containment area. The liquid was identified to be a mixture of water and diesel fuel. The diesel fuel is presumably from leaks in the piping associated with the nearby ASTs. Staining was observed on the ground surrounding the containment area as well as on the outside of the containment concrete. This finding is discussed further in Section 8.1.

**Solid Waste Disposal/Evidence of Fill Materials**

A pile of soil covered by a tarp was observed on the *target property*. A3E was unable to identify the purpose of the pile of soil. It is A3E’s opinion that the soil should be removed if there is no use intended.

A solid waste dumpster is present on the north side of the north building. Waste Management is responsible for emptying and proper disposal of the solid waste at a licensed landfill. No significant staining or issues were noted with the dumpster or enclosure. Based on condition of the dumpster and no visible signs of a hazardous material release, the dumpster is not indicative of a *Recognized Environmental Condition*.

**Wastewater**

Storm water infiltrates into soil, landscaped and gravel covered areas, or discharges into on-site storm water collection features. These features include storm drains in the paved parking lot. No visual indications of oil or other pollutants were noted in the vicinity of the drains. Based on the drainage being transported offsite to the city municipal system and no visible signs of staining or hazardous debris, wastewater removal is not indicative of a *Recognized Environmental Condition*.

**6.4 INTERIOR OBSERVATIONS**

During the site investigation, A3E observed the interior features of the *target property* for environmental conditions (past or present) that may be indicative of *Recognized Environmental Conditions*. The interior of the

Observed	Not Observed	Environmental Condition	REC
✓		Hazardous substances and petroleum products in connection with identified uses	No
✓		Storage Tanks	No
	✓	Odors	
	✓	Pools of Liquid	
✓		Drums	No
✓		Hazardous substances and petroleum products containers (not in connection with identified uses)	No
	✓	Polychlorinated biphenyls (PCBs)	
	✓	Stains or corrosion on floors, walls, ceilings (except staining from water)	

	✓	Drains and sumps	
	✓	Other Environmental Conditions	

**Hazardous Substances and Petroleum Products in Connection with Identified Uses**

Several one- and five-gallon containers of paint and property maintenance materials were observed in the warehouse portion of the *target property*. Additionally, several one-gallon and smaller containers of retail motor oils were stored in the warehouse portion. No drains or other subsurface conduits were observed near these materials, and no staining or evidence of materials mishandling was observed. Based on this information and the small quantities present, these materials are not expected to represent a significant environmental concern.

**Storage Tanks**

A 1,050-gallon diesel exhaust fuel AST was observed in the northern building. No evidence of spills or release were observed in the area of the AST. Additionally, diesel exhaust fuel is a non-hazardous chemical and is not regulated under CERCLA. Based on the contents and condition, it is A3E’s opinion that the presence of the AST is not indicative of a *Recognized Environmental Condition*.

**Drums**

Several drums were observed in the northern building. The contents of the drums were not ascertainable. All drums appeared to be in good condition with no evidence of spills or releases. However, based on the unknown use of the drums, it is A3E’s opinion that the drums be removed to prevent any releases of hazardous substances at the *target property*.

**Unidentified Hazardous Substance and Petroleum Product Containers**

Several drums were observed in the northern building. The contents of the drums were not ascertainable. All drums appeared to be in good condition with no evidence of spills or releases. However, based on the unknown use of the drums, it is A3E’s opinion that the drums be removed to prevent any releases of hazardous substances at the *target property*.

## 7.0 INTERVIEWS

Interviews were conducted with persons familiar with the *target property* and surrounding properties to obtain information regarding the presence or possible presence of Recognized Environmental Conditions in connection with the *target property*. Interviews were conducted in person, in writing, or by telephone. Any copies of communications records are included in Appendix E.

Interview	Name/Title	Type of Interview	Date of Interview	REC
Owner	[REDACTED]	Questionnaire	No Response	No
Key Site Manager	[REDACTED]	In Person	July 19, 2019	No
Occupant	Talent Truck Stop	N/A	N/A	No
Past Owner/Occupant	N/A	N/A	N/A	No
Fire Department	Talent Fire Department	FOIA	No Response	No

### 7.1 CURRENT OWNER INTERVIEW

A3E attempted to contact [REDACTED] to provide an owner questionnaire. [REDACTED] was not able to be contacted and did not complete the interview questionnaire in time for completion of this assessment.

This is considered a data gap per the ASTM Standard. Information provided by past owners, operators, and occupants, is likely duplicative of information already obtained from other sources. This data gap is not considered significant and is unlikely to affect the findings and conclusions in this report.

### 7.2 KEY SITE MANAGER INTERVIEW

[REDACTED] was interviewed during the site visit. [REDACTED] was not aware of any obvious indicators of hazardous releases or spills onsite that would be indicative of a *Recognized Environmental Condition*.

### 7.3 CURRENT OCCUPANT INTERVIEW(S)

The *target property* is currently vacant. Therefore, no additional interviews were conducted.

### 7.4 PAST OWNERS, OPERATORS, OCCUPANTS

Contact information for previous owners, operators and occupants at the *target property* was not provided.

No past owners, operators, or occupants were interviewed.

Information to be provided by past owners, operators, and occupants is likely duplicative of information already obtained from other sources.

## 7.5 LOCAL GOVERNMENT OFFICIAL INTERVIEW(S)

Local government officials were interviewed by A3E either in person, in writing, or by telephone. Interviews with local government officials are described below.

### Local Fire Department

A3E contacted the Talent Fire Department requesting records relate to spills, releases, or storage tanks at the *target property*.

A response has not been received in time for inclusion in this report.

FOIA responses that were not received at the time of the completion of this ESA will be reviewed by A3E when the information becomes available. If the reviewed information significantly alters A3E's findings and conclusions, an addendum to this assessment will be issued. Responses not received within 20 calendar days of the initial request for information are considered not *reasonably ascertainable* per the ASTM Standard.

## 7.6 OTHER PERTINENT INTERVIEWS

No other interviews were conducted as part of this assessment.



## 8.0 EVALUATIONS

### 8.1 FINDINGS/OPINIONS

The following evidence of known or suspect Recognized Environmental Conditions, Historical Recognized Environmental Conditions, and *de minimis* conditions were identified during the course of this assessment:

- A pool of liquid was observed onsite in the AST transfer containment area. The liquid appeared to be a mixture of water and diesel fuel. The diesel fuel is presumably from leaks in the piping associated with the nearby ASTs. Staining was observed on the ground surrounding the containment area as well as on the outside of the containment concrete. Based on the amount of staining in and around the AST containment area, as well as the observed pool of liquid, it is A3E's opinion that this represents a REC to the *target property*.
- The *target property* was listed on the SPILLS and ECSI database for a release of approximately diesel fuel to the soil and possibly the nearby creek. According to a review documents made available online at the ODEQ ECSI website, the ODEQ was notified in June 2002 of a visible sheen on Bear Creek adjacent to the site. The source of the sheen was identified to be from leaking underground piping at the site. Cleanup measures were taken in the form of drilling test holes to determine the extent of contamination and pumping free product from the test holes using a pumper truck and absorbent pads. From June 25, 2002 to July 23, 2002, an approximated 2,000 gallons of diesel was recovered through these methods. The ODEQ informed Talent Truck Stop that additional investigations would be required. The Talent Truck Stop informed the ODEQ that they would conduct further environmental work independent of ODEQ oversight. No additional documents/work was performed until October 2016 when ODEQ was informed of additional sampling conducted in the area by AEI Consultants. Gasoline, diesel and heavier range hydrocarbons in the soil and groundwater were detected. ODEQ's response to the 2016 sampling event indicated that further assessment of the releases from above-ground diesel tank piping is required and that the nearby Wagner/Bear Creek and the soil between the creeks require further evaluation. Specifically, creek sediments need to be evaluated to allow for an ecological risk assessment. A3E spoke with the ODEQ on July 31, 2019, who informed A3E that the facility is currently not a high priority but as resources allow, would be formally investigated by the ODEQ. Based on the know soil and groundwater impacts, it is A3E's opinion that this represents a REC to the *target property*.
- The east adjoining property was identified on Historical Aerials and City Directories to be a gas station from at least 2002 until 2018. Additionally, the east adjoining property was listed in the UST database for containing four active USTs onsite. No further information was obtained regarding the age, contents, size or construction of the USTs onsite. However, no evidence of releases or spills from the tanks were identified. Based on the presence of the tanks and lack of information on the tanks, it is A3E's opinion that this represents a business risk to the *target property*.
- Several drums were observed in the northern building. The contents of the drums were not ascertainable. All drums appeared to be in good condition with no evidence

of spills or releases. Based on the condition of the drums, it is A3E's opinion that the presence of the drums is *de minimis*. However, based on the unknown use of the drums, it is A3E's opinion that the drums be removed to prevent any releases of hazardous substances at the *target property*.

## 8.2 CONCLUSIONS

A3 Environmental, LLC has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527 of 251 West Valley View Road in Talent, Oregon, the *target property*. Any exceptions to, or deletions from, this practice are described in Sections 2.7 and 8.4 of this report.

This assessment has revealed no evidence of *Recognized Environmental Conditions*, except for the following:

- A pool of liquid was observed onsite in the AST transfer containment area. The liquid appeared to be a mixture of water and diesel fuel. The diesel fuel is presumably from leaks in the piping associated with the nearby ASTs. Staining was observed on the ground surrounding the containment area as well as on the outside of the containment concrete. Based on the amount of staining in and around the AST containment area, as well as the observed pool of liquid, it is A3E's opinion that this represents a REC to the *target property*.
- The *target property* was listed on the SPILLS and ECSI database for a release of approximately diesel fuel to the soil and possibly the nearby creek. According to a review documents made available online at the ODEQ ECSI website, the ODEQ was notified in June 2002 of a visible sheen on Bear Creek adjacent to the site. The source of the sheen was identified to be from leaking underground piping at the site. Cleanup measures were taken in the form of drilling test holes to determine the extent of contamination and pumping free product from the test holes using a pumper truck and absorbent pads. From June 25, 2002 to July 23, 2002, an approximated 2,000 gallons of diesel was recovered through these methods. The ODEQ informed Talent Truck Stop that additional investigations would be required. The Talent Truck Stop informed the ODEQ that they would conduct further environmental work independent of ODEQ oversight. No additional documents/work was performed until October 2016 when ODEQ was informed of additional sampling conducted in the area by AEI Consultants. Gasoline, diesel and heavier range hydrocarbons in the soil and groundwater were detected. ODEQ's response to the 2016 sampling event indicated that further assessment of the releases from above-ground diesel tank piping is required and that the nearby Wagner/Bear Creek and the soil between the creeks require further evaluation. Specifically, creek sediments need to be evaluated to allow for an ecological risk assessment. A3E spoke with the ODEQ on July 31, 2019, who informed A3E that the facility is currently not a high priority but as resources allow, would be formally investigated by the ODEQ. Based on the know soil and groundwater impacts, it is A3E's opinion that this represents a REC to the *target property*.

## 8.3 ADDITIONAL INVESTIGATION

Based on the findings of this Phase I ESA, A3E recommends additional investigation or inquiry to evaluate Recognized Environmental Conditions identified in this report.

Specifically, A3E recommends additional inquiry into the integrity of the AST system to ensure that the pump, underground piping and ASTs are not currently leaking along with soil and/or groundwater sampling in the area of staining to determine the extent of impact. Further, A3E recommends additional soil and/or groundwater sampling to determine the extent of impact from the 2002 release of diesel fuel and whether or not the nearby creek has been impacted in accordance with ODEQ regulations.

#### **8.4 DELETIONS**

No deletions from the proposed scope of work were noted during preparation of this report.

## 9.0 ADDITIONAL (NON-SCOPE) SERVICES

Additional non-scope considerations are environmental conditions in connection with the *property* that are outside the scope of the Phase I ESA practice. If specifically requested by Client, evaluations of non-scope considerations are discussed further below.

### 9.1 ASBESTOS-CONTAINING BUILDING MATERIALS

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength.

A3E has conducted a limited, visual evaluation of accessible areas for the presence of suspect ACMs at the *target property*. The objective of this visual survey was to note the presence and condition of suspect ACM observed. The information below is for general informational purposes only and does not constitute an asbestos survey. In addition, the information is not intended to comply with federal, state, or local regulations in regard to ACM.

The *target property* buildings were constructed in 1955 and 1977, at a time when the use of ACM was common. During the site reconnaissance, A3E identified materials, which may contain asbestos, including drywall and joint compound, acoustic ceiling tiles, floor tile and associated mastics.

The suspect ACMs noted above were observed in good condition at the time of the site visit and are therefore not considered an immediate environmental concern. However, in the event of damage, renovation, or demolition, the suspect ACMs should be properly assessed for asbestos and handled in accordance with federal, state and local regulations.

### 9.2 FLOODPLAINS

The Federal Emergency Management Agency (FEMA) publishes Flood Insurance Rate Maps (FIRMS) that identify the Flood Zone for a property.

According to the FIRMS, the target property is located on Community Panel 41029C2182F, dated May 3, 2011 and is located in Flood Zone AE, which are areas that have a 1% probability of flooding every year (100-year floodplain).

### 9.3 WETLANDS

A3E reviewed the online US Fish & Wildlife Service's National Wetlands Inventory (NWI) Wetlands Mapper to determine if wetlands are present/mapped on the *target property*.

According to the map, wetlands are present on the target property. A freshwater forested/shrub wetland follows the west border of the *target property* according to the US Fish and Wildlife Service's NWI. If future development in these areas is planned, A3E recommends contacting the local planning and/or building departments to determine whether a wetlands delineation report is required and/or if mitigation is required in order to develop in these areas.

### 9.4 RADON

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. The US EPA has prepared a map to assist National, State, and local organizations to target their resources and to implement radon-

resistant building codes. The map divides the country into three Radon Zones; Zone 1 (Exceed 4.0 pCi/L), Zone 2 (2.0-4.0 pCi/L), and Zone 3 (less than 2.0 pCi/L). The US EPA recommends additional action for radon concentrations above 4.0 pCi/L). The *target property* was identified to be in Zone 3, below the US EPA recommendation for additional action. No sampling was performed to determine site-specific radon concentrations. Based on the radon zone classification, radon is not considered to be an environmental concern.

## **9.5 LEAD-BASED PAINT**

Lead was commonly used as a paint additive prior to 1972 due to the improved durability of such lead-based paint (LBP) products. The adverse health effects associated with lead exposure include brain and central nervous system damage, hearing loss, kidney damage, disrupted blood cell formation, and adverse effects on the reproductive system. Exposure to lead can be particularly harmful to young children, pregnant women, and men and women during their reproductive years. In 1978, the use of LPB was banned completely for consumer products, although such products may still be used for industrial/military applications.

Based on the age of the building (circa 1955, 1977), LBP may be present. All painted surfaces were observed to be in good condition at the time of A3E's site reconnaissance and are not considered an immediate environmental concern. However, in the event of renovation, demolition or other construction activities that would disturb painted surface, A3E recommends a survey be completed to confirm the present or absence of LBP.

## **9.6 LEAD IN DRINKING WATER**

An evaluation of lead in drinking water was not conducted as part of this assessment.

## **9.7 VAPOR INTRUSION PATHWAY**

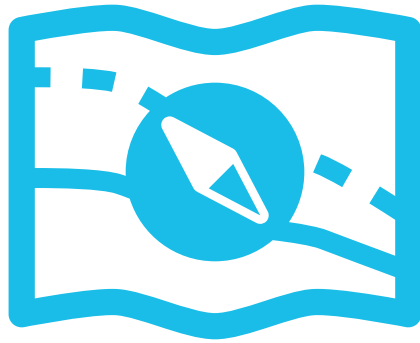
ASTM E 2600 Standard Practice for Assessment of Vapor Intrusion into Structures on Property Involved in Real Estate Transactions, which reviews the potential for vapor intrusion conditions, was considered beyond the scope of work and was not conducted as part of this Phase I ESA.

## **9.8 OTHER CONSIDERATIONS**

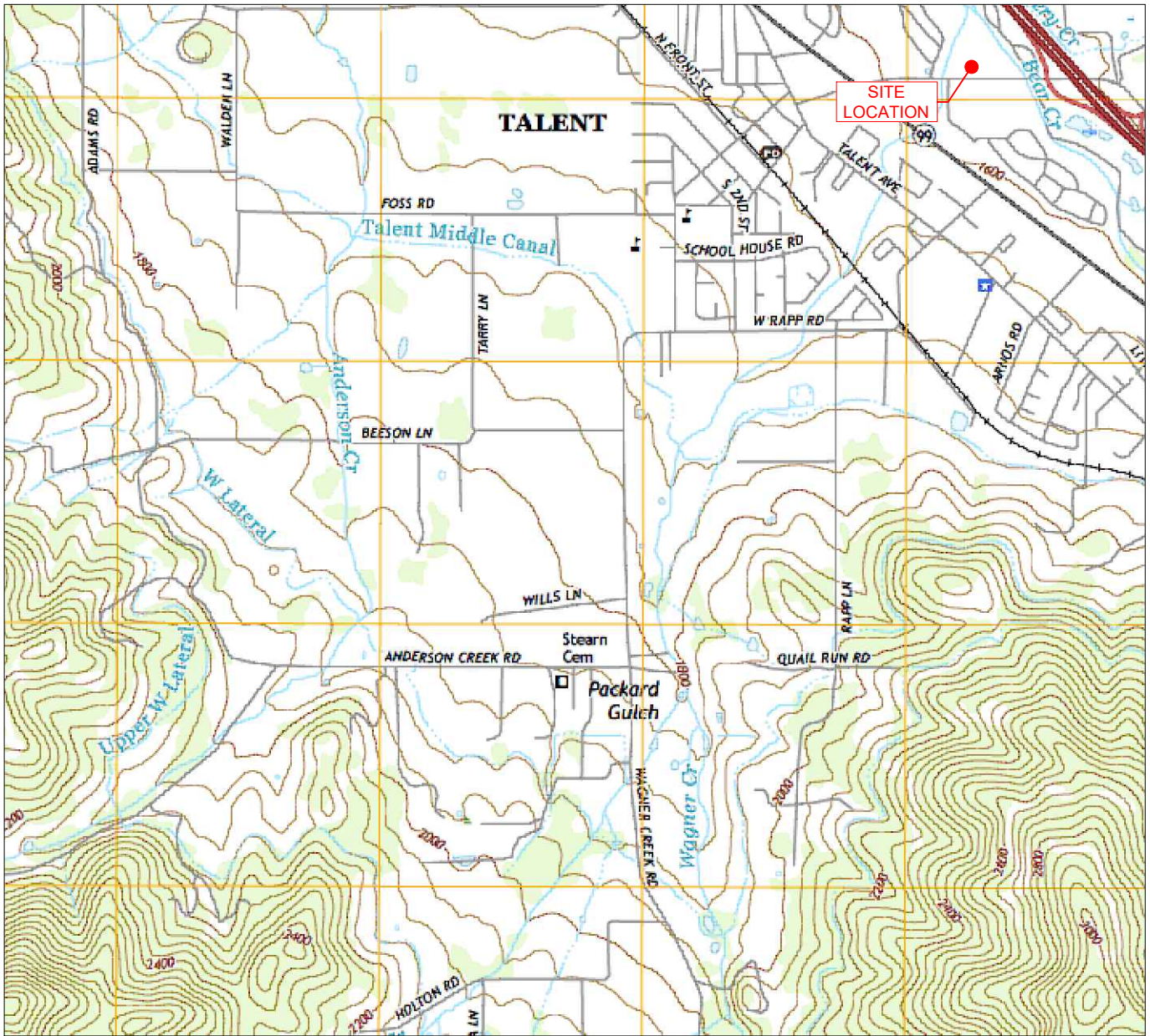
No additional environmental issues were considered as part of this assessment.

## 10.0 REFERENCES

Resources	Agency/Provider/Contact Information	Date
<b>Phase I Guidelines</b>	ASTM International, <i>Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process</i> , November 2013 (ASTM 1527-13)	
<b>Environmental Records</b>	ERIS Database Report	July 18, 2019
<b>Physical Setting Report</b>	ERIS Physical Setting Report	July 18, 2019
<b>Aerial Photographs</b>	ERIS Historical Aerial Report	July 18, 2019
<b>Fire Insurance Maps</b>	ERIS Fire Insurance Maps	N/A
<b>Property Tax Files</b>	Jackson County website	July 17, 2019
<b>Land Title Records</b>	Jackson County GIS	July 23, 2019
<b>USGS Topographic Maps</b>	N/A	N/A
<b>Local Street Directories</b>	ERIS Historical City Directories	July 20, 2019
<b>Building Department Records</b>	Talent municipal office	N/A
<b>Zoning/Land Use Records</b>	Talent Zoning Map	
<b>Environmental &amp; Activity Land Use Controls</b>	Environmental Lien Search Report	
<b>Geological Information</b>	<i>Bedrock Geology of Oregon</i> , Oregon State Geological Survey	July 22, 2019
<b>Soils Information</b>	United States Department of Agriculture Natural Resources Conservation Service ( <a href="http://www.soils.usda.gov/">http://www.soils.usda.gov/</a> )	July 18, 2019
<b>Flood Information</b>	Federal Emergency Management Agency (FEMA) ( <a href="http://www.fema.gov">http://www.fema.gov</a> )	July 18, 2019
<b>Wetland Information</b>	National Wetlands Inventory On-line Mapper, U.S. Fish and Wildlife Service Website ( <a href="http://www.fws.gov/wetlands/data/mapper.HTML">http://www.fws.gov/wetlands/data/mapper.HTML</a> )	July 18, 2019
<b>Other Sources</b>		



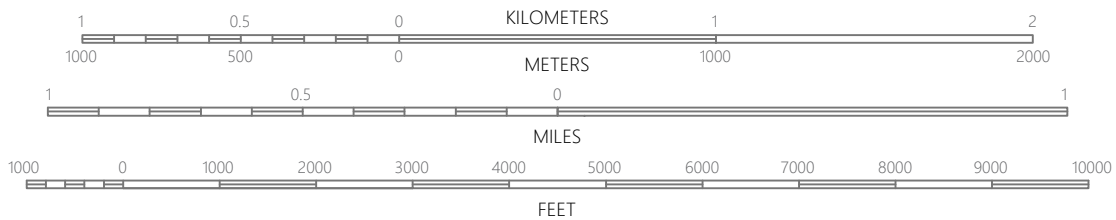
## FIGURES



Contour Interval 40 Feet  
North American Vertical Datum of 1988

Scale 1:24000

Topographical Map adopted by USGS  
Talent, OR 2017



**A3E**  
ENVIRONMENTAL  
Clean Soil - Clean Slate  
11 E Main Street  
St Charles, IL 60174  
Phone: 888-405-1742

# FIGURE 1

## Site Topographic Map

Client: [REDACTED] New York, NY 10119



### SITE LOCATION

Truck Stop  
251 West Valley View Road  
Talent, OR 97520  
Jackson County

Project No. 2019.377  
Date 7.23.2019





Imagery adopted from Google Earth  
 Parcel Data from Jackson County Property Data Online

APX SCALE 1" = 200'

**Legend:**

- Site Property Boundary
- Adjacent Property Boundary
- LAND USE INFORMATION

**A3E**  
**ENVIRONMENTAL**  
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# FIGURE 2

## Site Area Map



Client: [REDACTED] New York, NY 10119

**SITE LOCATION**  
 Truck Stop  
 251 West Valley View Road  
 Talent, OR 97520  
 Jackson County

Project No. : 2019.377  
 Date : 7.23.2019



Imagery adopted from Google Earth  
 Parcel Data from Jackson County Property Data Online

APX SCALE 1" = 90'

**Legend:**  
 - - - Site Property Boundary

**A3E**  
 ENVIRONMENTAL  
 Clean Soil - Clean Slate  
 11 E Main Street  
 St Charles, IL 60174  
 Phone: 888-405-1742

# FIGURE 3

## Site Detail Map

Client : [REDACTED] New York, NY 10119



### SITE LOCATION

Truck Stop  
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 Talent, OR 97520  
 Jackson County

Project No. : 2019.377  
 Date : 7.23.2019