



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

January 30, 2024

Colin Polk
Prosper Portland
220 NW 2nd Ave., Suite 200
Portland, OR 97209

RE: No Further Action Determination
for USPS – Fleet Operations in Portland
LUST #26-92-0068

Colin Polk:

The Oregon Department of Environmental Quality (DEQ) has completed a review of available file information for the USPS – Fleet Operations site/property in Portland, including the *Addendum to UST Decommissioning Report* prepared by Stantec Consulting Services on October 13, 2023 on your behalf. The USPS – Fleet Operations site address is 715 NW Hoyt Street, Tax Lots 1N1E34BC-00100 & -00200.

DEQ has determined that remedial action to address environmental contamination at the USPS – Fleet Operations site is complete, and no further action is required. This determination is a result of our evaluation and judgment based on the DEQ regulations and the facts as we now understand them including the following:

- The 13.37-acre site is bounded by NW Lovejoy Street to the north, NW Hoyt Street to the south, NW Broadway to the east, and NW 9th Avenue to the west.
- The Northern Pacific Terminal Company established a railyard at the site in the 1880s. The railyard operated through the 1950s.
- The United States Postal Service (USPS) constructed a Processing & Distribution Center (P&DC) and a Vehicle Maintenance Facility (VMF) on the site in 1962. USPS purchased the site in 1974.
- Five underground storage tanks (USTs) were decommissioned by removal from the VMF in March 1992: a 10,000-gallon gasoline UST, two 5,000-gallon diesel fuel USTs, a 1,000-gallon heating oil UST, and a 300-gallon waste oil UST.
- A total of 226 tons of petroleum-contaminated soils (PCS) were excavated from around the USTs and shipped to the Hillsboro Landfill for disposal.
- Residual concentrations of gasoline and diesel exceeding Level II Soil Matrix Cleanup standards remained at the site but could not be removed without undermining a fuel pump island and the VMF.
- A new 10,000-gallon diesel fuel UST was installed at the VMF in June 1992.
- In August 1993, a 25,000-gallon heating oil tank (HOT) was decommissioned by removal from the south side of the P&DC. Approximately 321 tons of PCS were excavated from around the HOT and shipped to Oregon Hydrocarbon for thermal treatment and disposal.
- A pocket of heating oil impacted soils could not be removed without undermining the P&DC.
- DEQ issued a No Further Action determination for the UST removals and cleanups in June 1997, noting the residual pockets of contamination. “Should conditions change allowing access to the contamination, you are responsible for further evaluation of the remaining contamination and any cleanup necessary at that time.”

- The Portland Development Commission, now known as Prosper Portland, purchased the site for redevelopment in 2016. USPS vacated the site in 2018.
- The VMF was demolished in August 2020, and the 10,000-gallon diesel UST installed in June 1992 was decommissioned by removal in September 2020. Approximately 1,390 tons of PCS were removed from the VMF area and shipped to the Hillsboro Landfill for disposal.
- Demolition of the P&DC began in February 2023 and continued through the end of the year.
- In September 2023, 25 tons of residual PCS were excavated from the former 25,000-gallon HOT location on the south side of the P&DC.
- The two pockets of residual petroleum contamination referenced in the June 1997 NFA letter have been removed from the site.
- The depth to shallow groundwater ranges from 10-20 feet below ground surface at the site. The shallow groundwater was not significantly impacted by releases from the USTs.

Based on the available information, soil conditions at the USPS – Fleet Operations site are currently protective of public health and the environment in accordance with Oregon Administrative Rules 340-122-0205 through 340-122-0360. The site requires no further action unless new or previously undisclosed information becomes available, or there are changes in site development or land and water uses, or more contamination is discovered. DEQ will update the Leaking Underground Storage Tank (LUST) database to reflect this decision.

This letter only applies to the release(s) discussed above. If any contaminated media is encountered in the future, it must be handled and disposed of in accordance with local, state and federal regulations.

A copy of the *Addendum to UST Decommissioning Report* from Stantec Consulting Services supporting this No Further Action decision can be viewed on [DEQ's LUST database](#). DEQ recommends keeping a copy of all of the documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Kevin Dana at 503-229-5369, or via email at kevin.dana@deq.oregon.gov.

Sincerely,



Kevin Parrett, Manager
Northwest Region Cleanup Section

Attachments: 1997 NFA Letter
Site Maps

cc: Graeme Taylor, Stantec
LUST #26-92-0068 File

June 13, 1997

LES FISH
US POSTAL SERVICE
715 NW HOYT STREET ROOM 4113
PORTLAND OREGON 97208

DEPARTMENT OF
ENVIRONMENTAL
QUALITY

NORTHWEST REGION

Re: US Postal Service - Fleet Maintenance
File No. 26-92-068

Dear Mr. Fish:

The Department of Environmental Quality has completed its review of the information submitted to date concerning the underground storage tank (UST) decommissionings and cleanups conducted at 715 NW Hoyt Street in Portland, Oregon. The Department has determined that the cleanups appear to have met the requirements of Oregon Administrative Rules (OAR) 340-122-205 through 340-122-360 and that no further action is required at this time.

This determination is a result of our evaluation and judgment based on the regulations and facts as we now understand them, including:

1. A 300 gallon waste oil, a 1,000 gallon diesel, a 5,000 gallon diesel, a 10,000 gallon gasoline, and a 25,000 gallon heating oil UST were decommissioned at this location. The tanks were recycled at Oregon Pacific Steel.
2. Gasoline, diesel, waste oil, heating oil contamination were discovered during the decommissionings. The gasoline, diesel, and waste oil contamination was detected next to the fleet maintenance building on the north side of the property. The waste oil contamination was detected next to the Post Office Building on the south side of the property. Approximately 226 tons of gasoline, diesel and waste oil contaminated soil were disposed of at Hillsboro Landfill. Approximately 321 tons of heating fuel contaminated soil were taken to Oregon Hydrocarbons for treatment.
3. After cleanup was complete next to the fleet maintenance building, up to 71,000 parts per million (ppm) total petroleum hydrocarbons (TPH) and 245 ppm gasoline were detected in the soil next to and underneath the building and next to the pump island. Most of the remaining contamination is less than three feet below ground surface and is covered by pavement and the foundation of the building. None of this contamination extends below 6 feet below ground surface. Approximately 340 cubic yards of contamination remain in this pocket.

John A. Kitzhaber
Governor



2020 SW Fourth Avenue
Suite 400
Portland, OR 97201-4987
(503) 229-5263 Voice
TTY (503) 229-5471
DEQ-1

Les Fish

June 13, 1997

Page 2

4. A maximum of 380 ppm diesel and 190 ppm TPH was detected remaining in the rest of the UST excavations near the fleet maintenance building. These concentrations are below the 500 ppm cleanup level for diesel and heavier hydrocarbons established for this site. Except for the pocket of contamination, no gasoline was detected in confirmatory soil samples.
5. After cleanup was complete in the heating oil tank area, a small pocket of contamination, with up to 770 ppm TPH, remained next to the Post Office Building foundation. No contamination remained in the rest of the excavation above the 500 ppm TPH cleanup level established for the heating oil cleanup.
6. No groundwater was encountered in the excavations. Groundwater is present at approximately 21 feet below ground surface.
7. Two pockets of contamination remain on this property which exceed the currently required cleanup levels for this site, but which the Department approves leaving pursuant to OAR 340-122-355(4) since the removal of this contamination would endanger structures on the property or be prohibitively expensive, and the contamination does not threaten human health, safety, welfare and the environment.

The Department's approval to leave pockets of contamination is based on the site conditions described in the reports as they exist today. Should conditions change allowing access to the contamination, you are responsible for further evaluation of the remaining contamination and any cleanup necessary at that time. You are also responsible for notifying potential purchasers of the property about this remaining pocket of contamination.


The Department's determination will not be applicable if new or undisclosed facts show that the cleanup does not comply with the referenced rules. The Department's determination also does not apply to any conditions at the site other than the release of the petroleum product specifically addressed in the report(s).

Please note that pursuant to OAR 340-122-360(2), a copy of your report must be retained until ten (10) years after the first transfer of the property. We recommend that a copy of this information be kept with the permanent facility records.

Les Fish
June 13, 1997
Page 3

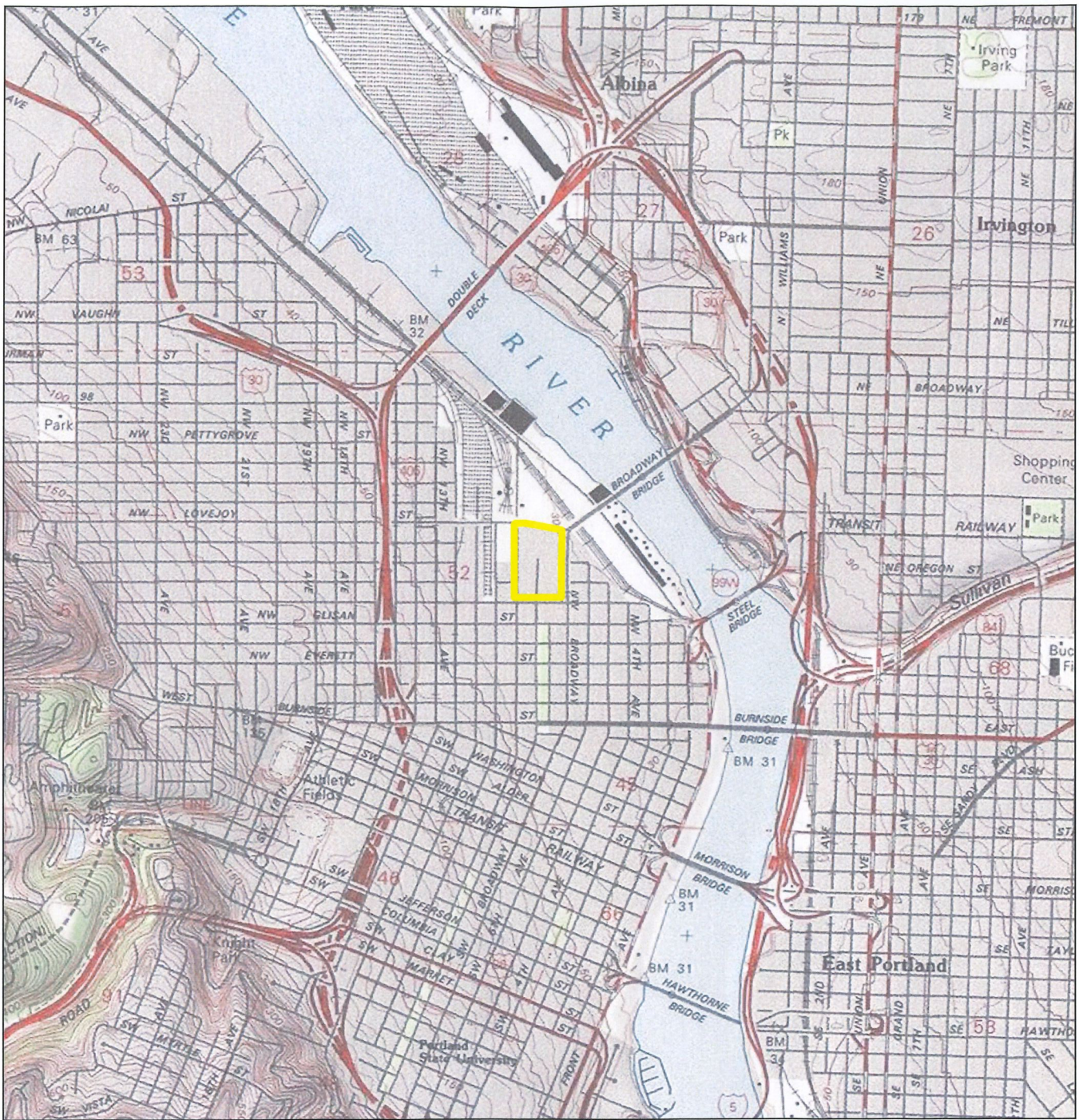
Your efforts to comply with the regulations to ensure that your facility has been adequately cleaned up have been appreciated. If you have any questions, please feel free to contact me at (503) 229-5474.

Sincerely,

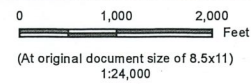
A handwritten signature in cursive script that reads "Andree Pollock". The signature is written in black ink and is positioned below the word "Sincerely,".

Andree Pollock
UST Cleanup Specialist

cc: Shawn Williams
Dames & Moore
1750 SW Harbor Way, Suite 400
Portland, Oregon 97201



 Property Boundary



Project Location
City of Portland
Multnomah County, OR

Project Number
185750980

Client/Project
Prosper Portland
Former USPS P&DC Facility

Figure No.
1

Title
Project Location

- Notes**
1. Coordinate System: NAD 1983 StatePlane Oregon North FIPS 3601 Feet
 2. Data Sources:
 3. Background: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri

V:\185750980 ProsperPDX\03_data\gis\mxd\figures\HotSpot_20231010\FooterLocation.mxd Revised: 2023-10-10 By: jmontague

Disclaimer: This document has been prepared based on information provided by others as cited in the Notes section. Stantec has not verified the accuracy and/or completeness of this information and shall not be responsible for any errors or omissions which may be incorporated herein as a result. Stantec assumes no responsibility for data supplied in electronic format, and the recipient accepts full responsibility for verifying the accuracy and completeness of the data.



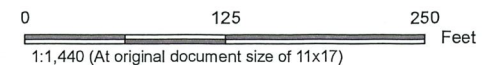
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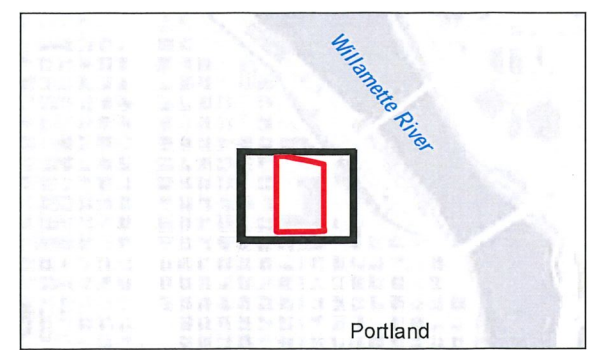
Figure No.
3
Title
Abandoned Monitoring Well Locations

Client/Project
Remedial Action Closure Report
Former USPS P&DC
Prosper Oregon

Project Location 185750980
715 NW Hoyt Street
Portland, Oregon
Prepared by LS on 2021-07-27
Technical Review by JH on 2021-07-27
Independent Review by GT on 2021-07-27



- Abandoned Monitoring Well
- Approximate Property Boundary

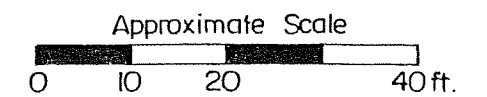
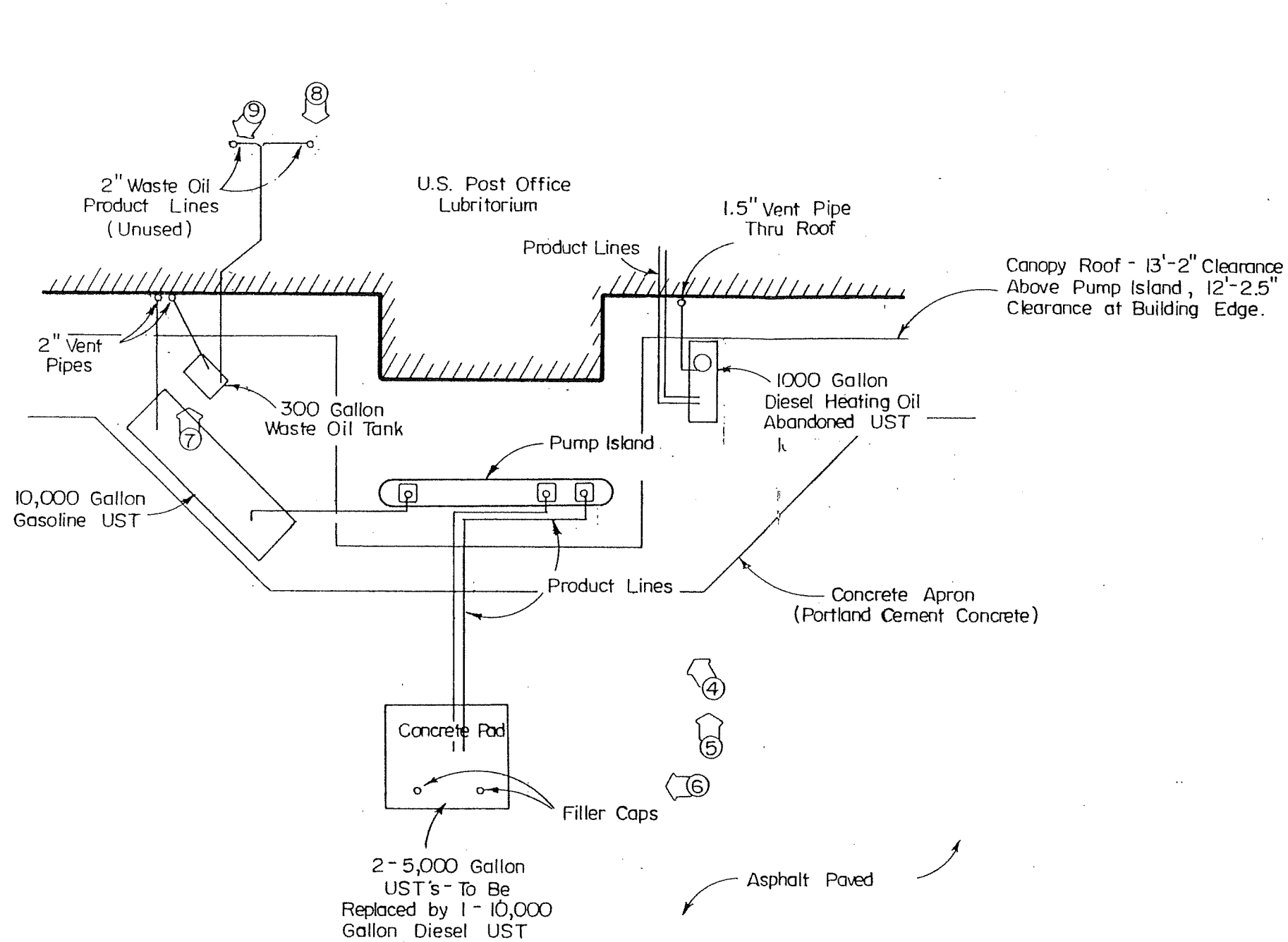


- Notes
1. Coordinate System: NAD 1983 StatePlane Oregon North FIPS 3601 Feet Intl
 2. Base features produced under license with: Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, City of Portland, Oregon
 3. Orthoimagery City of Portland, 2018.
 4. Soil sample location, sample ID, and dataset: Arcadis RI, 2006 and Exponent CMMP, 2011.


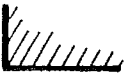



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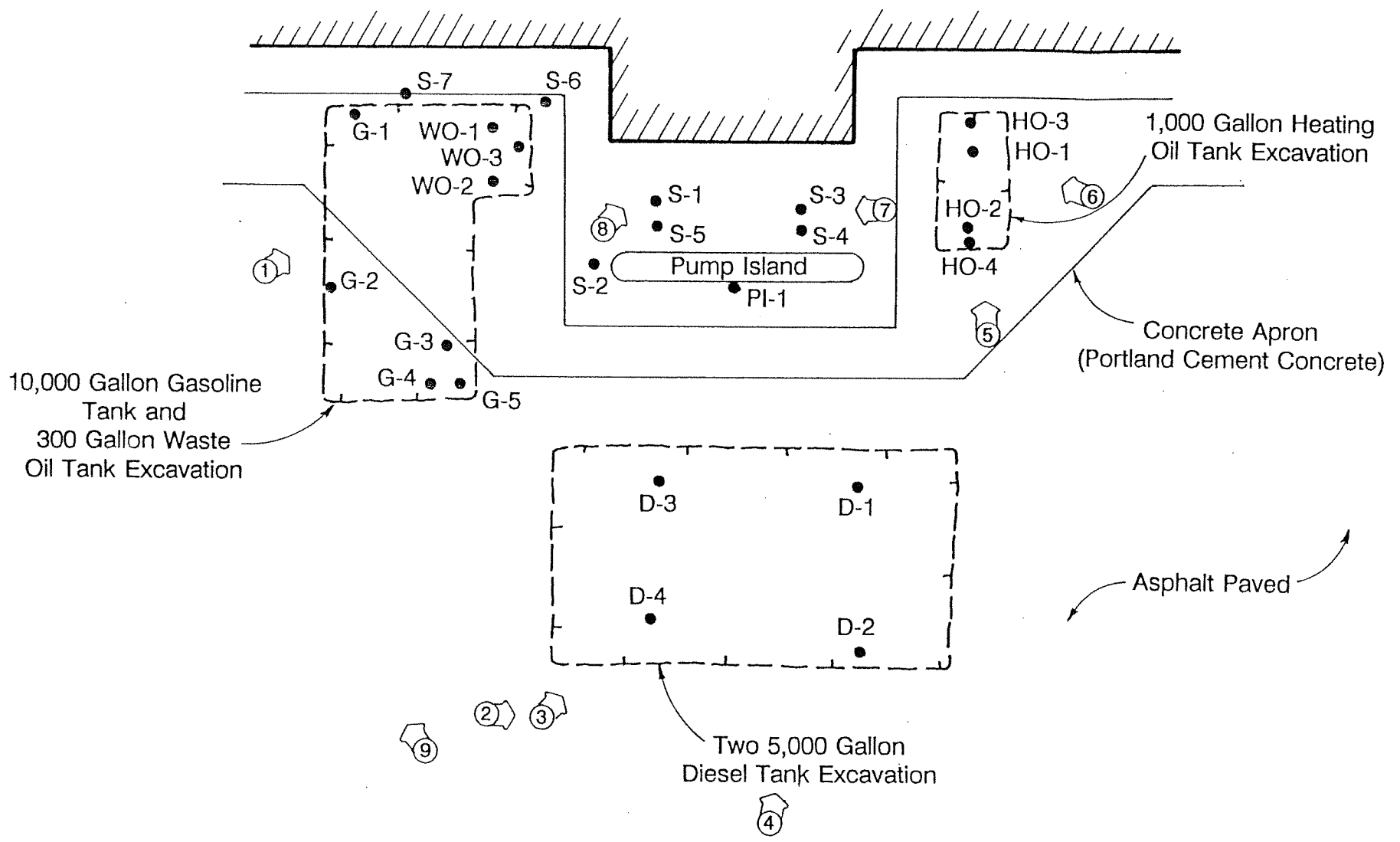
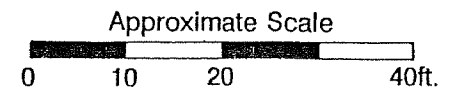
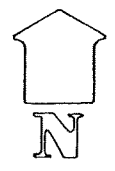
LEGEND

-  Photo Number and Direction of View
-  Existing Building
-  Fuel Pumps

Note :
Underground Utilities Not Indicated
On This Plan.


 Earth Consultants Inc. Geotechnical Engineers, Geologists & Environmental Scientists		Site Plan - Lubritorium Existing Underground Storage Tanks USPS, Portland			
				Proj No. 4414-110	Drwn. GLS

U.S. Post Office - VMF



LEGEND

- Approximate Location of ECI Test Samples
- [Dashed Box] Approximate Extent of Excavation
- ① Photo Number and Direction of View

 Earth Consultants Inc. <small>Geotechnical Engineers, Geologists & Environmental Scientists</small>		Sample Location Plan USPS - VMF Portland, Oregon		
Proj No. 4414-110	Drwn. GLS	Date May '92	Checked SE	Date 5/18/92
				Plate 3.1

V:\1857\Active\185750980_Prosper\PD\03_data\GIS\vmz\185750980_VehicleMaintenanceFacilityExclosureReport_V05_vmz_exc_sampling.mxd
 Revises: 2021-07-29 By: lamsmh

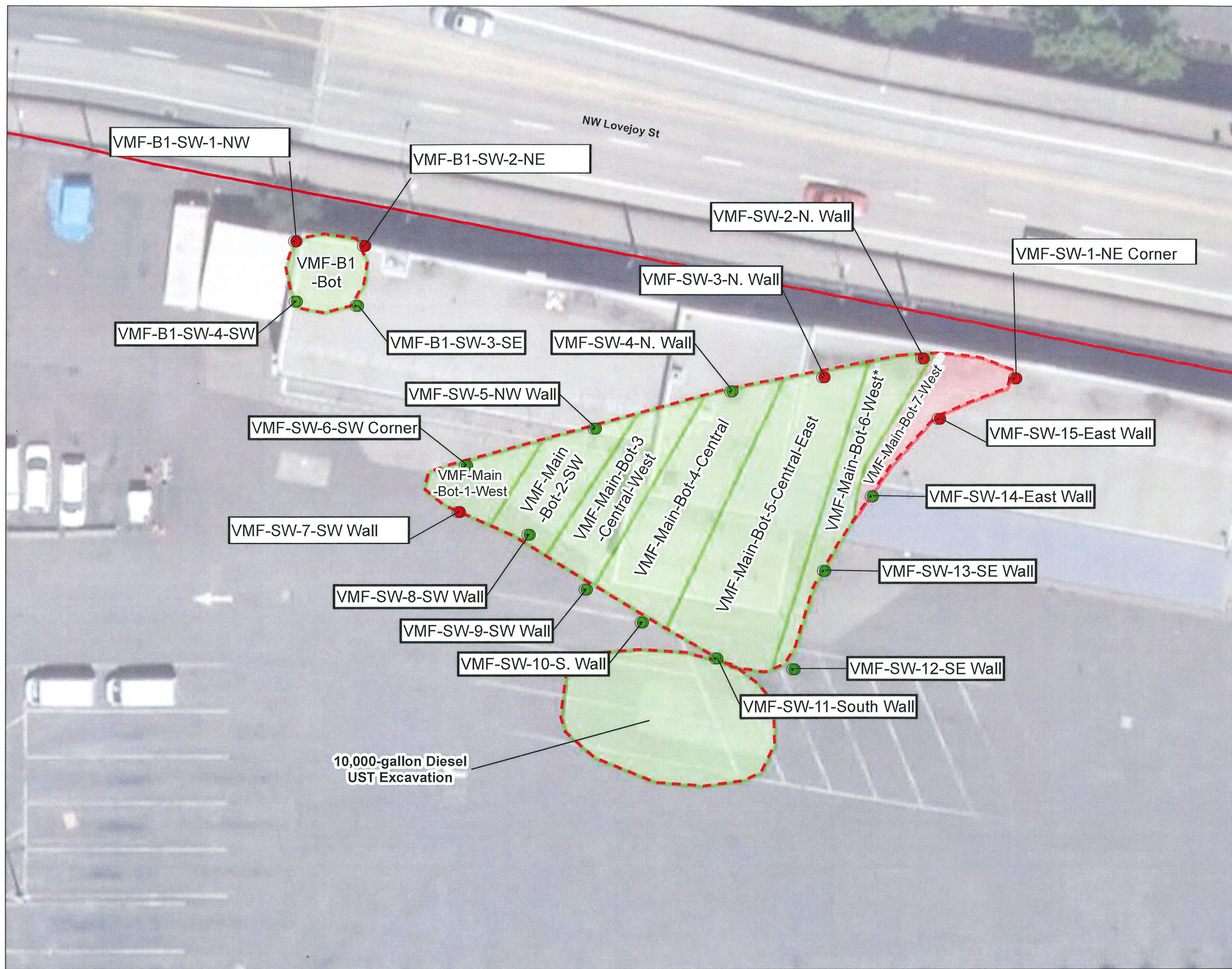
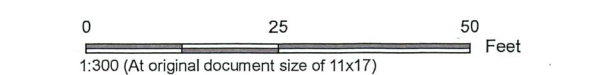
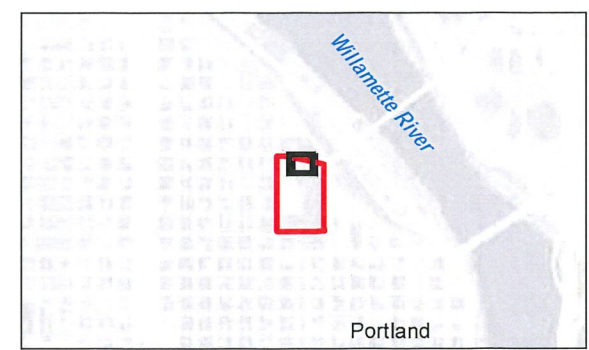


Figure No.
5
 Title
Vehicle Maintenance Facility Excavation Limits and Confirmation Sampling
 Client/Project
 Remedial Action Closure Report
 Former USPS P&DC
 Prosper Oregon
 Project Location
 715 NW Hoyt Street
 Portland, Oregon
 185750980
 Prepared by LS on 2021-07-27
 Technical Review by JH on 2021-07-27
 Independent Review by GT on 2021-07-27



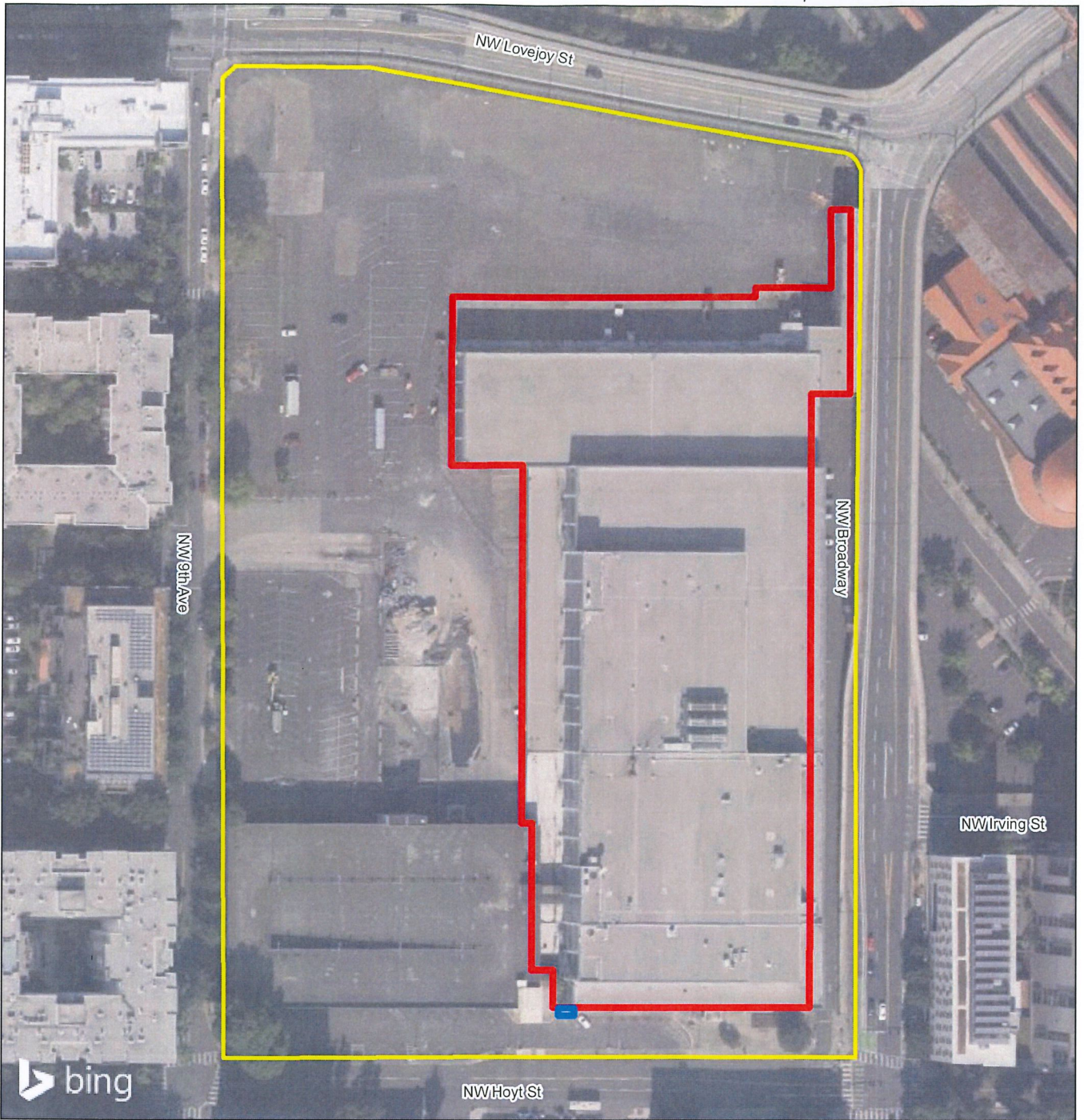
- Grab Soil Sample Location
- Grab Sample Result**
- Soil Parameters Tested Below Standards
- One or More Soil Parameters Tested Exceeded Indicated Standard
- Composite Sample Result**
- Soil Parameters Tested Below Standards
- One or More Soil Parameters Tested Exceeded Indicated Standard
- Approximate Excavation Area
- Approximate Property Boundary

* ID should have been East instead of West
 ** ID should have been NW instead of West

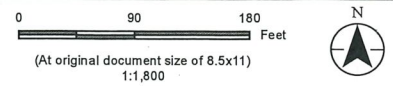


- Notes**
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 3. Orthoimagery City of Portland, 2018.
 4. Soil sample location, sample ID, and dataset: Arcadis RI, 2006 and Exponent CMMP, 2011.





- Excavation
- Approximate Former USPS P&DC Facility Footprint
- Property Boundary



Project Location
City of Portland
Multnomah County, OR

Project Number
185750980

Client/Project

Prosper Portland
Former USPS P&DC Facility

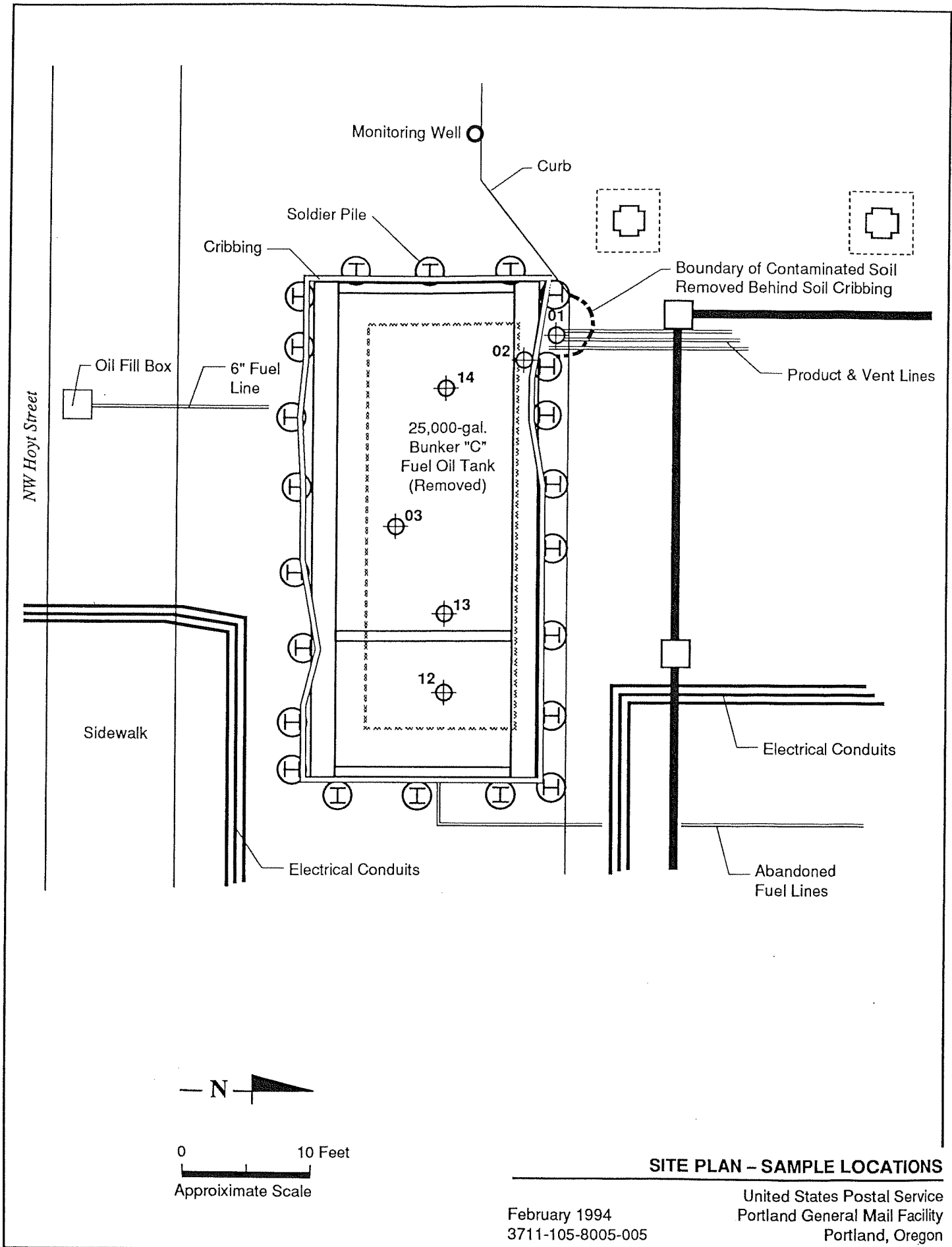
Figure No.
2

Title
Excavation Area Location

Notes
 1. Coordinate System: NAD 1983 StatePlane Oregon North FIPS 3601 Feet
 2. Data Sources:
 3. Background: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri

V:\185750980 Prosper\PD\03_data\gis_cad\figs\mxd\figures\hotspot_2023\1010\ExcavationAreaLocation.mxd Revised: 2023-10-10 By: rmontague

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0 10 Feet
 Approximate Scale

SITE PLAN - SAMPLE LOCATIONS

February 1994
 3711-105-8005-005

United States Postal Service
 Portland General Mail Facility
 Portland, Oregon

