



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

Northwest Region

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TTY 711

July 20, 2023

Kimberly Fuson  
Schnitzer Properties  
1431 SW 11<sup>th</sup> Ave.  
Portland, OR 97201

RE: No Further Action Determination  
for Cedar Sinai Park – Clay Tower Apts. in Portland  
LUST #26-22-0544

Kimberly Fuson:

The Oregon Department of Environmental Quality (DEQ) has completed a review of available file information for the Cedar Sinai Park – Clay Tower Apartments site/property in Portland, including the *Underground Storage Tank Closure Report* dated September 30, 2022, which was submitted to DEQ by Soil Solutions Environmental Services on your behalf. The Cedar Sinai Park – Clay Tower Apartments address is 1430 SW 12<sup>th</sup> Avenue, Tax Lot 1S1E04AD-01700.

DEQ has determined that remedial action to address environmental contamination at the Cedar Sinai Park – Clay Tower Apartments 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 site is occupied by the Rose Schnitzer Tower, a multi-story senior living facility constructed in 1980. The property owner is Cedar Sinai Park – Clay Tower Apartments Limited Partnership.
- A 500-gallon underground storage tank (UST) holding biodiesel was located beneath a landscaping bed on the northeast corner of the building.
- In July 2022, soil samples were collected from the east and west ends of the UST at depths of 6-8 feet below ground surface (bgs). Diesel was detected in the east soil sample at a concentration of 6,600 parts per million (ppm).
- The contaminated soil sample was further analyzed for petroleum constituents. Benzene was detected at a concentration of 0.04 ppm, along with ethylbenzene (2.1 ppm), naphthalene (1.1 ppm), pyrene (0.9 ppm), toluene (1.8 ppm), and xylenes (10.3 ppm).
- Approximately 64 gallons of fuel and 30 gallons of water were removed from the UST.
- A soil sample was collected through the bottom of the UST at a depth of 6½ feet bgs, at a point where holes were observed in the bottom of the tank. Diesel (60,000 ppm) and heavy oils (2,100 ppm) were detected in the sample. A second soil sample was collected in the same location at a depth of 15 feet bgs. No diesel or oils were detected.
- Soil samples were also collected below the four sides of the UST at depths of 11-13 feet bgs. No diesel or oils were detected in the samples.
- The UST was decommissioned by removal in September 2022 and shipped to Metro Metals Northwest for recycling as scrap. Approximately 12 tons of petroleum-contaminated soils (PCS) were excavated from the UST pit and shipped to the Hillsboro Landfill for disposal.
- Confirmation soil samples were collected from the bottom of the excavation pit (at 11 feet bgs), and from the east and south sidewalls at 7½ feet bgs.

- Diesel was detected in the south sidewall at a concentration of 3,500 ppm. The sample was further analyzed for petroleum constituents, finding ethylbenzene (0.075 ppm), naphthalene (0.42 ppm), pyrene (0.54 ppm), and xylenes (1.46 ppm).
- Soil Solutions estimated that approximately 0.89 cubic yards of PCS remain at the site, which cannot be removed due to nearby structures.
- The residual contamination is too deep to pose a direct contact risk to residents of the site, and does not exceed any other applicable risk-based concentration (RBC).
- No groundwater was encountered at the site to a maximum explored depth of 18 feet bgs. Soil Solutions reported that groundwater in the area is approximately 100-120 feet bgs.
- The nearest ecological habitat is the City of Portland's South Park Blocks, approximately 450 feet east-southeast of the site. The nearest surface water body is the Willamette River, 0.63 miles east-northeast of the site.

Based on the available information, soil conditions at the Cedar Sinai Park – Clay Tower Apartments 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 *Underground Storage Tank Closure Report* from Soil Solutions 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](mailto:kevin.dana@deq.oregon.gov).

Sincerely,



Kevin Parrett, Manager  
Northwest Region Cleanup Section

Attachments: Site Maps

cc: Kendra Williams, Soil Solutions  
Quinn Black, Schnitzer Properties  
LUST #26-22-0544 File

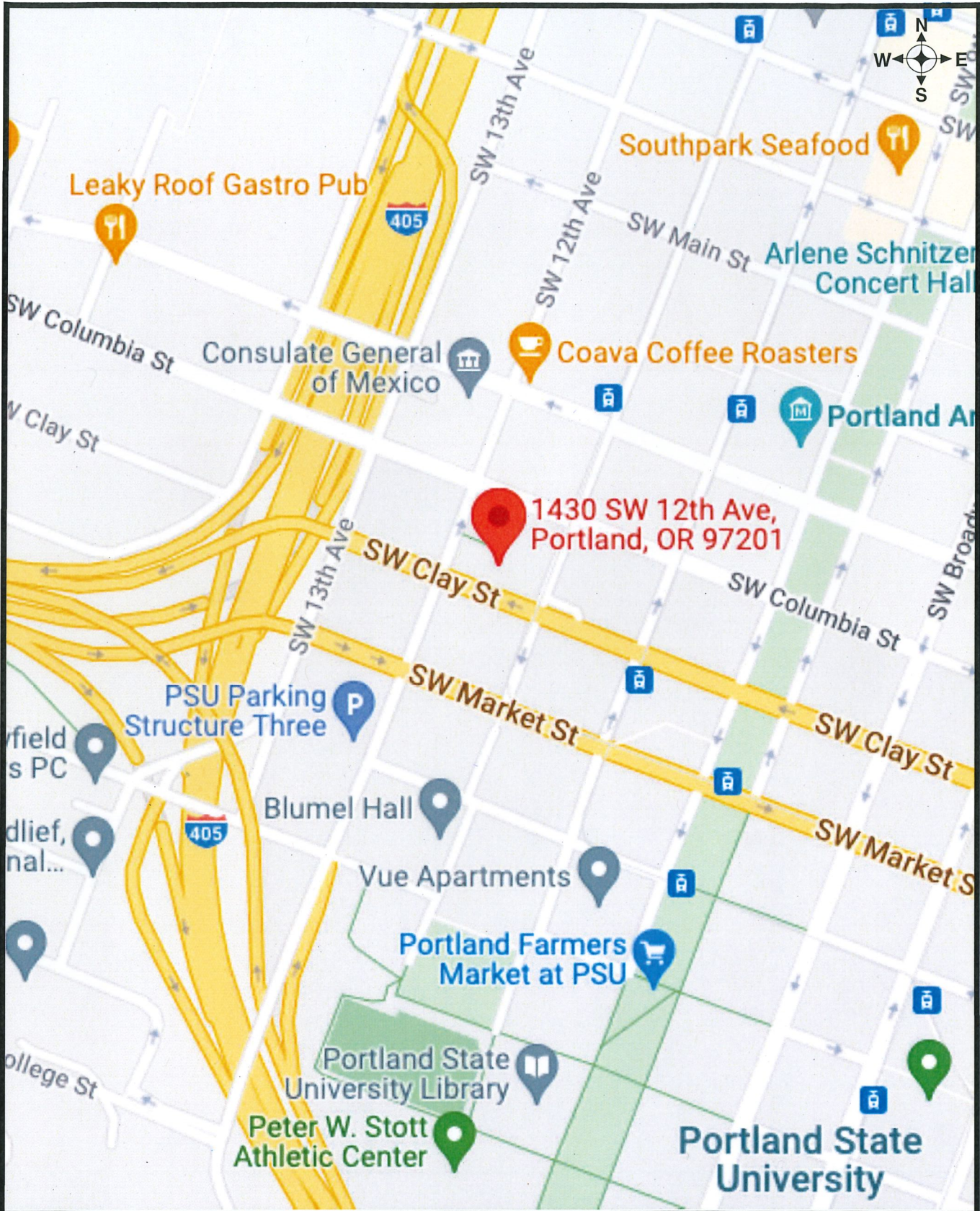


Figure 1: Vicinity Map  
 1430 Southwest 12th Avenue  
 Portland, Oregon 97201  
 DEQ File #26-22-0544

PROJECT: UST
DATE: 9/30/22
Approximate Scale: 1" = 360'

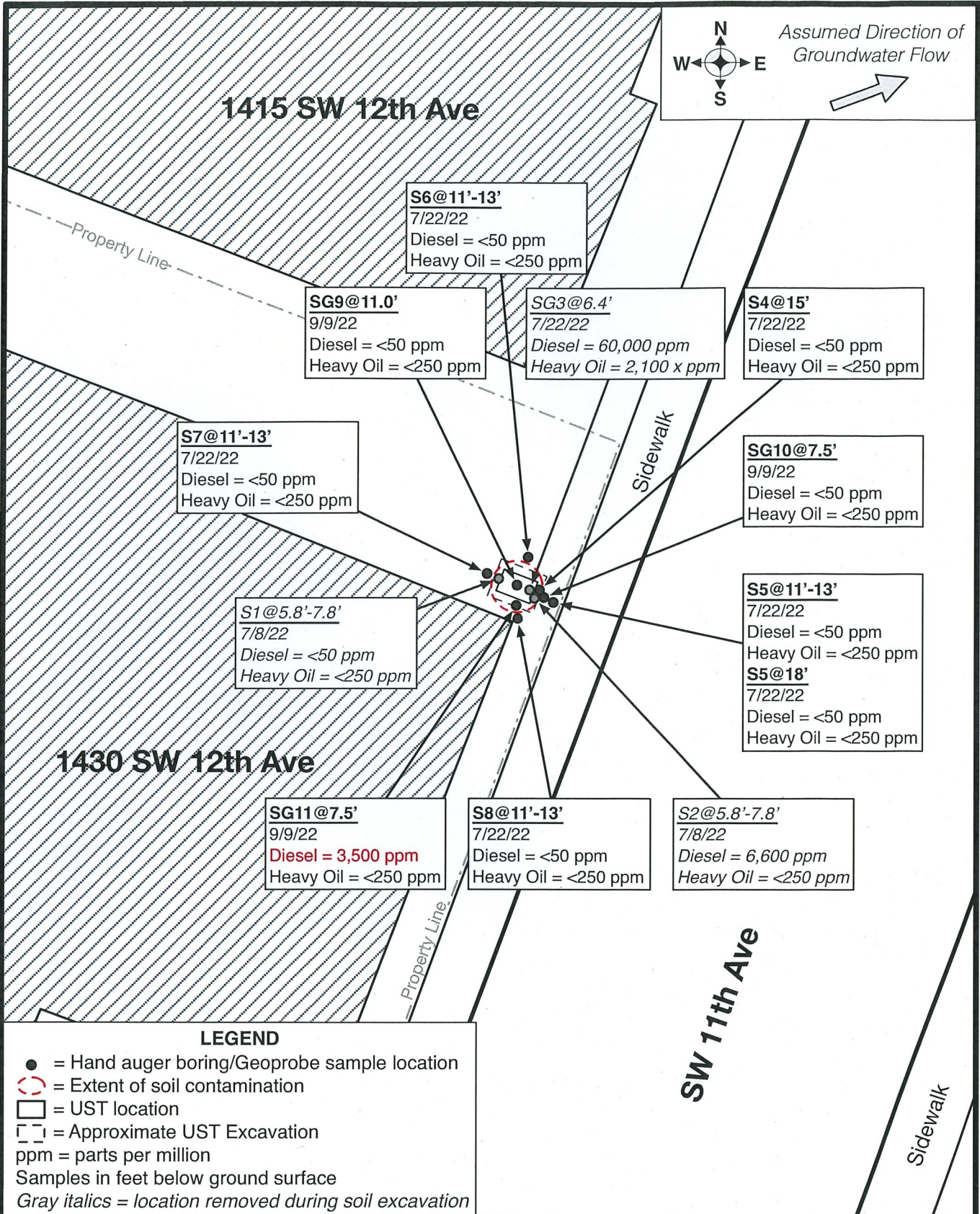


Figure 2: Site Map  
1430 Southwest 12th Avenue  
Portland, Oregon 97201  
DEQ File #26-22-0544

PROJECT: UST

DATE: 9/30/22

Approximate Scale: 1" = 20'