



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Northwest Region
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5263

July 10, 2024

Mike Walsh
McCall Companies
5480 NW Front Ave.
Portland, Oregon 97210

RE: **Opportunity to Comment**
Proposed Conditional No Further Action Determination
COMMENTS DUE: 8/11/2024
Front LP Properties, Cleanup ID Number 1239

Dear Mr. Walsh:

The Oregon Department of Environmental Quality (DEQ) is providing oversight for the investigation and cleanup of a release of hazardous substances from the above referenced site. Based on our review of site information, we have determined that site conditions are protective of public health, safety and welfare, and the environment under the Oregon Environmental Cleanup Law, ORS 465.200 et seq. This determination is summarized in their Consultant's Name closure report titled, *Updated Site Characterization Report and Corrective Action Plan*, dated December 26, 2023. DEQ issues a no further action determination when a cleanup has met regulatory standards under Oregon's Cleanup law.

Free product and high concentrations of bunker oil petroleum contamination remain in the southwestern portion of the subject property and the southeastern portion of your property. The contamination is located in subsurface soil and groundwater at depths of to approximately 13 feet below ground surface. The estimated extent of contamination is shown on the attached Figure 1. Although the contamination meets Oregon's Cleanup standards based on current and anticipated future use of the properties, additional cleanup or disposal restrictions may be required in the event that unanticipated changes to land use occur or if the residual contamination is disturbed or removed from the ground.

Front LP Properties and McCall have both entered into Easements and Equitable Servitude restricting uses in these areas. In particular, Front Avenue III, LLC has agreed to groundwater use restrictions, removing free product prior to any site redevelopment, and submitted a contaminated media management plan.

Because your property is located adjacent to the site, DEQ is notifying you of its proposal to issue a no further action determination. We will consider any comments that you may have before finalizing the decision. Directions on how to comment on DEQ's proposal and where to find additional information are provided below.

How to Comment

Send comments by 5 p.m. on August 11, 2024, to DEQ Project Manager Rob Hood by phone (503) 860-9661, email Robert.Hood@deq.oregon.gov, or mail 700 NE Multnomah Street, Suite 600, Portland, OR 97232.

Where to Find Additional Information

Detailed information supporting DEQ's proposed no further action determination is contained in the Consultant's Name closure report noted above. This document and other site documents may be viewed on DEQ's web site at:

<https://ormswd2.synergydcs.com/HPRMWebDrawer/Record?q=recTitle%3A1239&sortBy=>.

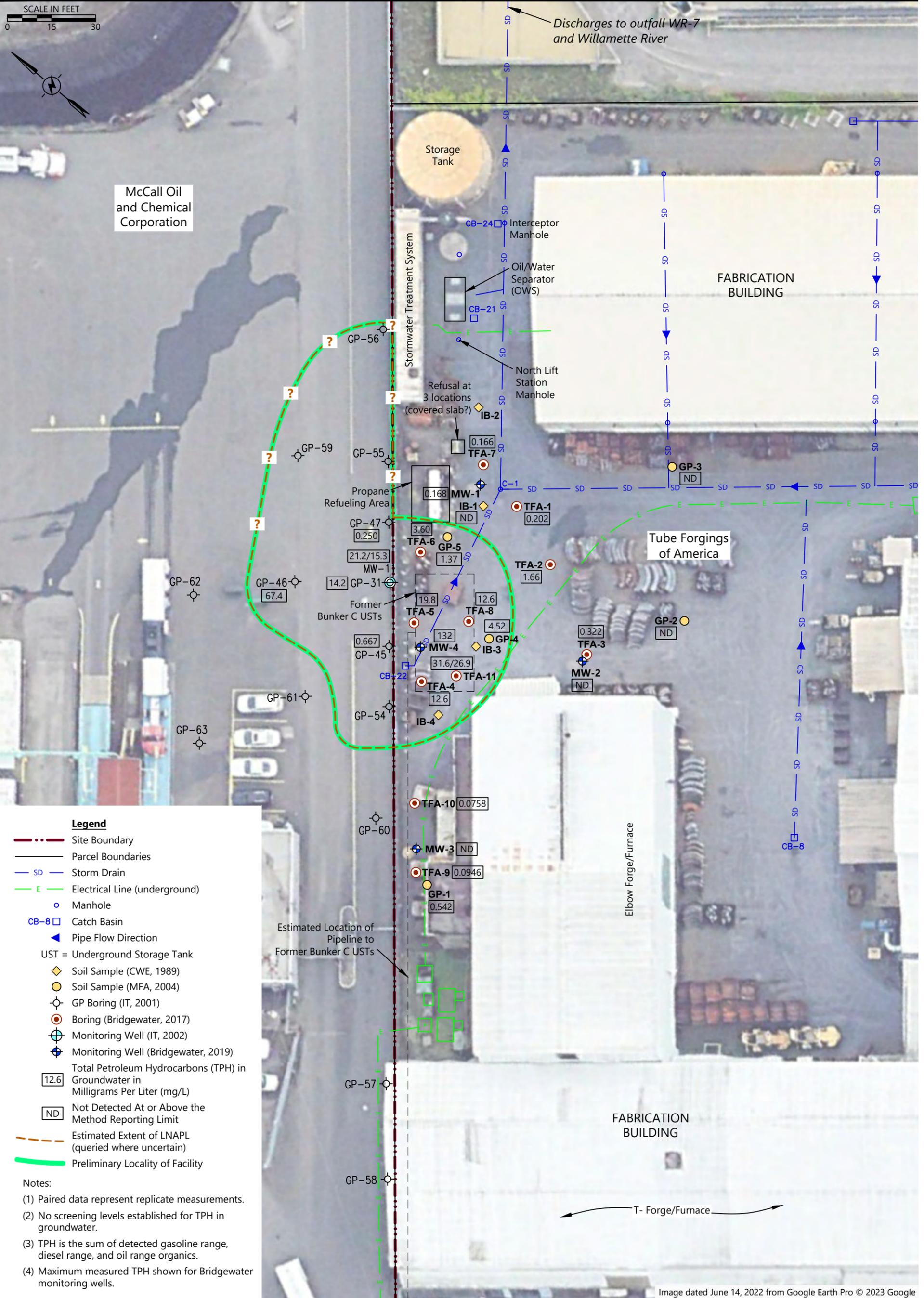
You may contact me at (503) 860-9661 or Robert.Hood@deq.oregon.gov if you have questions about the project or how to comment.

Respectfully,

A handwritten signature in blue ink that reads "Robert A. Hood, Jr." with a stylized flourish at the end.

Robert A. Hood, Jr., Project Manager
Northwest Region Cleanup Section

Attachments: Figure 1-Locality of Facility Map
cc: Cleanup #1239 File



Legend

- Site Boundary
- Parcel Boundaries
- SD Storm Drain
- E Electrical Line (underground)
- o Manhole
- CB-8 Catch Basin
- ▲ Pipe Flow Direction
- UST = Underground Storage Tank
- ◆ Soil Sample (CWE, 1989)
- Soil Sample (MFA, 2004)
- ⊕ GP Boring (IT, 2001)
- ⊙ Boring (Bridgewater, 2017)
- ⊕ Monitoring Well (IT, 2002)
- ⊙ Monitoring Well (Bridgewater, 2019)
- 12.6 Total Petroleum Hydrocarbons (TPH) in Groundwater in Milligrams Per Liter (mg/L)
- ND Not Detected At or Above the Method Reporting Limit
- - - Estimated Extent of LNAPL (queried where uncertain)
- Preliminary Locality of Facility

Notes:

- (1) Paired data represent replicate measurements.
- (2) No screening levels established for TPH in groundwater.
- (3) TPH is the sum of detected gasoline range, diesel range, and oil range organics.
- (4) Maximum measured TPH shown for Bridgewater monitoring wells.

Preliminary Locality of Facility

Tube Forgings of America/Front Avenue LLCs
5200 NW Front Avenue
Portland, Oregon