



# Oregon

Tina Kotek, Governor

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

August 19, 2024

Kathryn Silva, General Counsel  
The Zidell Companies  
2020 SW 4th Avenue, Suite 600  
Portland, OR 97201

RE: Conditional No Further Action Determination  
for Tube Forgings of America in Portland  
Cleanup File Number #1239

Dear Ms. Silva:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information for the Front LP Properties, including the closure report entitled *Updated Site Characterization Report and Corrective Action Plan*, dated December 26, 2023, which was submitted to DEQ by The Bridgewater Group on your behalf. The Front LP Properties address is 5200 NW Front Avenue in Portland, Tax Lot 1N1E19A 1100. Figure 1 shows the Site Location and Vicinity.

DEQ has determined that cleanup and investigations to address environmental contamination at Front LP Properties is complete, and no further action is required with conditions as outlined in an Easement and Equitable Servitudes (EES). 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:

- In 1942, the site was purchased by Oregon Steel Mills who constructed an electric steel rolling mill. In 1955, the property was purchased by Gilmore Steel & Supply Company. The steel mill operated until 1978, when it was purchased by Emery Zidell for Tube Forgings of America operations-manufacturing of precision welding fittings.
- The cause of contamination was from two 20,000-gallon bunker oil tanks and associated piping (LUST number 26-88-0116). The LUST file was merged with the Cleanup file #1239.
- Affected media are soil, soil vapor, and groundwater. Free product exists on the subject property and the northwest adjacent property, owned by McCall Oil and Chemical Corporation (who received a conditional NFA in 2017 for the contamination on its property).
- The tanks were removed in 1988. The release appeared to be from a poor connection to the west tank. Up to 1,000 cubic yards of soil were disposed of at Circle C Landfill in Vancouver, Washington. At that time borings were installed to determine the magnitude and extent of contamination. Borings were installed in 2004 and 2017. Four monitoring wells were installed in July/August 2019, and four quarters of monitoring were completed. Free product was found in MW-4, during monthly monitoring. Free floating product was measured on groundwater from a trace to 0.05 feet. As a result, an oil-absorbing sock was installed in the well. Groundwater was approximately 12-13 feet below ground surface (bgs) in the other monitoring wells and groundwater flow was measured to be north, toward the Willamette River. No releases were noted along the former product line along the northwest portion of the property.
- The location of the facility (area of remaining contamination) is shown on Figure 2. The contamination remains in-place on the western portion of the subject property and the eastern portion of the McCall Oil property in soil (TFA site only) and groundwater. Based on investigations,

contamination has not and is not expected to reach the Willamette River, approximately 0.25 miles north the site.

- In July 2019, one soil gas sample was installed near the former USTs (sample TFA-SG-1, located near TFA-8-Source on Figure 3). Soil vapor results were below commercial vapor intrusion into buildings risk-based concentrations with the exception of a slight exceedance of benzene of 56 ug/m<sup>3</sup> with an RBC of 52 ug/m<sup>3</sup>. Thus, this pathway is potentially complete. However, due to the high voltage line located in this area, it is unlikely that commercial redevelopment would occur in this area. And if the area is redeveloped for urban residential uses, the free product would need to be removed per the EES.
- The property and the McCall Oil property are zoned Heavy industrial (IH) and both are expected to continue to be used for this purpose. The site can be used for urban residential uses, but it is not expected based on the industrial nature of the area.
- Water is supplied to the site by the City of Portland's municipal supply. Also, the shallow groundwater in the vicinity is not used as a potable source.
- Although concentrations exceed risk-based concentrations (RBCs) for construction and excavation workers, a contaminated media management plan has been submitted to and approved by DEQ.
- On July 10, 2024, DEQ sent a public notice letter to McCall Oil and chemical informing it of remaining contamination on its property. No comments were received.
- An EES was recorded on the subject property on May 3, 2024. The restrictions included no use of potable groundwater, removal of free product if redevelopment occurs, and required the submission of a contaminated media management plan, January 2024.

Based on the available information, soil, soil gas, and groundwater conditions at Front LP Properties are currently protective of public health and the environment in accordance with Oregon environmental cleanup law, 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 has updated the Your DEQ Online (YDO) 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 Bridgewater Group's closure report supporting this No Further Action decision can be viewed at <https://ormswd2.synergydcs.com/HPRMWebDrawer/Record?q=recTitle%3A1239&sortBy=> 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 Rob Hood at (503) 860-9661, or via email at [Robert.Hood@deq.oregon.gov](mailto:Robert.Hood@deq.oregon.gov).

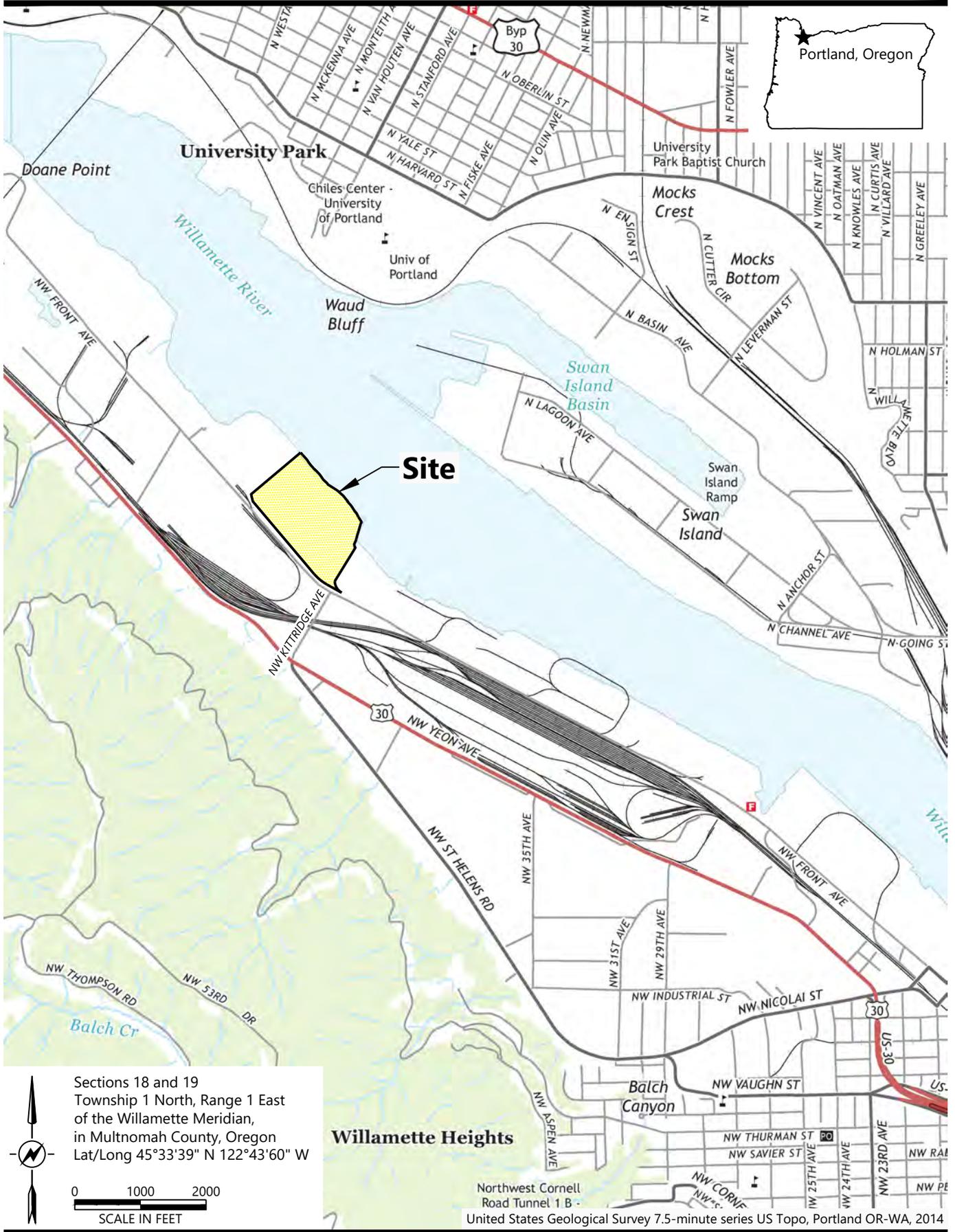
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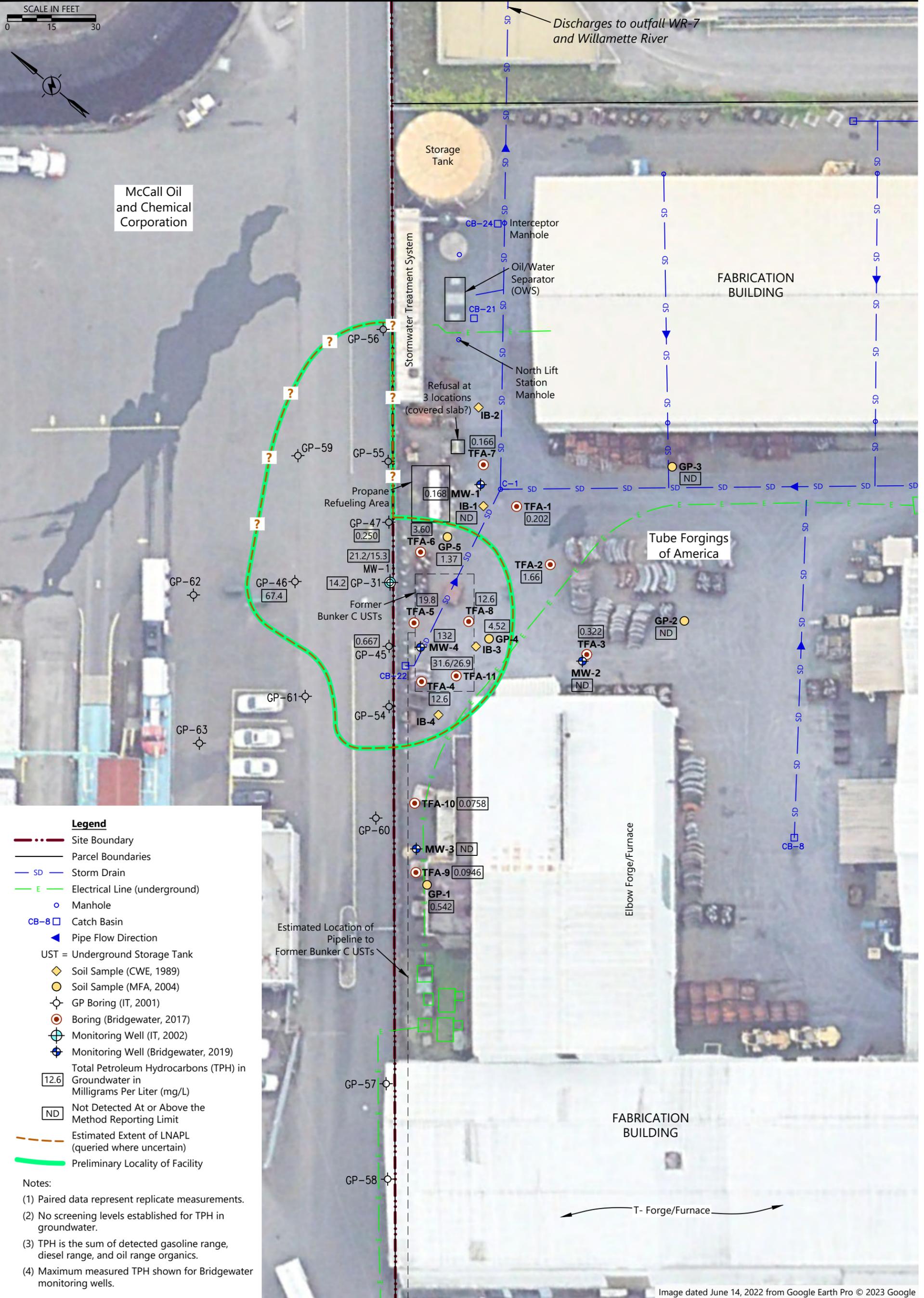
Kevin Parrett, Manager  
Northwest Region Cleanup Section

Attachment(s): Figures 1, 2, and 3

cc: Anna St. John-The Bridgewater Group  
Water Resources Department Well Construction Program Coordinator-Kris Byrd  
ECSI #1239



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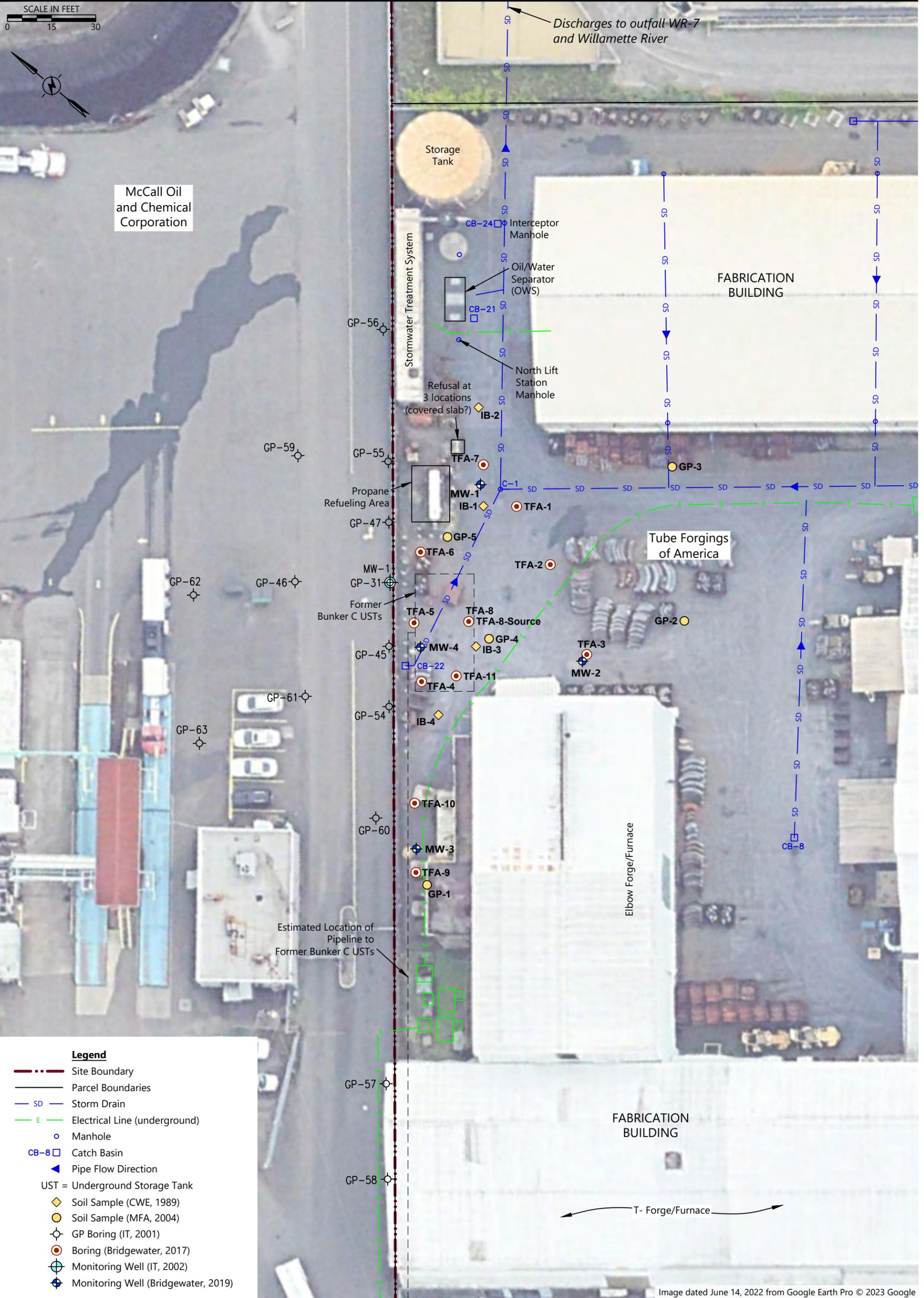


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