



# Oregon

Kate Brown, Governor

Department of Environmental Quality  
Northwest Region  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232  
(503) 229-5696

December 3, 2024

Freewell Apartments, LLC  
Attn: James Santana  
2175 NW Raleigh Street, Suite 104  
Portland, OR 97210

RE: No Further Action Determination  
for Block 291E, Portland, Oregon  
LUST #26-22-0118

Dear James Santana,

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information for the Block 291E site, including the closure report titled *Construction Completion Report* dated November 22, 2022, which was submitted to DEQ by NV5 on your behalf. The Block 291E site (also referenced as the Freewell Site in reports) address is 2030 Northwest Raleigh Street in Portland, Oregon, Tax Lot 0105 of Multnomah County Tax Map 1N1E33BA.

DEQ has determined that remedial action to address environmental contamination at Block 291E 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:

- Block 291 was initially developed with residential buildings and a fire station prior to 1889. Between 1889 and 1908, additional commercial structures were constructed at Block 291. By 1936, the former structures were removed, and Block 291 was redeveloped with a truck garage and loading facility associated with Consolidated Freightways. Between 1965 and 1969, the structures were removed, and Block 291 was redeveloped as a paved parking area. By 2021, the western half of Block 291 was redeveloped with a six-story, mixed use building (contamination on Block 291W was addressed under the Leaking Underground Storage Tank [LUST] identification number 26-19-1116). The Block 291E site was redeveloped as a seven-story, mixed-use building with one below-grade parking level. Block 291 is currently zoned as Commercial Mixed Use (CM3) and will likely be used as mixed commercial and residential use in the future.
- During Block 291E redevelopment activities (including mass excavation, installation of soldier piles and tieback anchors, and excavations associated with existing drywell nos. 1 through 4 and newly installed drywell no. 5), a total of 9,393.6 tons of potentially contaminated soil was exported from the site and disposed of at the Hillsboro landfill under Permit No. 136850OR.

- Five undocumented underground storage tanks (USTs) were discovered during the mass excavation of the site. The tanks ranged in size from an estimated 500 gallons to 1,000 gallons. A total of 3,655 gallons of water and 90 gallons of sludge was removed from the USTs and recycled at an Oil Re-Refining Company (ORRCO) permitted facility. After the USTs were cleaned, they were crushed and salvaged as scrap metal at Metro Metals Northwest, Incorporated of Portland, Oregon.
- Residual petroleum contamination at concentrations greater than applicable risk-based concentrations (RBCs) was left in place in limited areas in the west-central portion of site, including along the center portion of the west exterior building wall at depths of 6 to 12 feet below ground surface (bgs) and beneath the below-grade parking garage at depths of 21 to 26 feet bgs (Figure 2).
- A soil gas sample (SG-1) was collected during a 2017 Phase II Environmental Site Assessment. Gasoline-range hydrocarbons were detected in SG-1 at a concentration of 1,250,000 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ). After the mass excavation, two soil gas samples (SG-2 and SG-3) were collected from the area exhibiting the highest concentrations of petroleum hydrocarbons. Gasoline-range hydrocarbons were detected in the SG-2 and SG-3 at concentrations of 917,000  $\mu\text{g}/\text{m}^3$  and 12,800,000  $\mu\text{g}/\text{m}^3$ , respectively.
- Due to the elevated concentrations of petroleum hydrocarbons and volatile organic compounds in the soil and soil gas beneath the parking garage, DEQ requested indoor air samples be collected from the elevator shaft and maintenance room in the below-grade garage as well as in the units directly above the residual contamination (Units 128 and 131). Nine Radiello-130 passive air samplers were deployed at the site between May and July 2024. All samples were below the applicable occupational or residential RBCs for indoor air.
- The below-grade parking garage is outfitted with a continuously operating ventilation system and nine separate carbon monoxide and nitrogen oxide sensors within the garage. The parking garage ventilation system was designed to comply with the Oregon Mechanical Specialty Code 404.1 and International Mechanical Code 404.2 requirements (also the City of Portland's requirements).
- During a Phase II Environmental Site Assessment, perched groundwater was encountered at the site and analyzed for petroleum hydrocarbons, metals, and polycyclic aromatic hydrocarbons. Arsenic, lead, and oil-range petroleum hydrocarbons were detected in the sample; however, the analytes were detected at concentrations less than the groundwater in excavation RBC. Local groundwater is anticipated to be at least 40 feet bgs.
- The property and surrounding areas are supplied drinking water by the municipal water system and the site groundwater has no current or likely future beneficial use as a drinking water source.
- The site is devoid of habitat except for minor landscaping. The nearest surface water body is the Willamette River located approximately 0.41 miles to the northeast of the site. No ecological or human health risks were identified because most of the property is paved

Based on the available information, soil, groundwater, and indoor air conditions at Block 291E 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 will update 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 NV5's closure report supporting this No Further Action decision can be viewed at <https://ordeq-edms-public.govonlinesaas.com/pub/pub-rcd/projects/review/9/10326;tab=doc>. 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 Rebecca Digiustino at (503) 926-2257 or via email at [rebecca.digiustino@deq.oregon.gov](mailto:rebecca.digiustino@deq.oregon.gov).

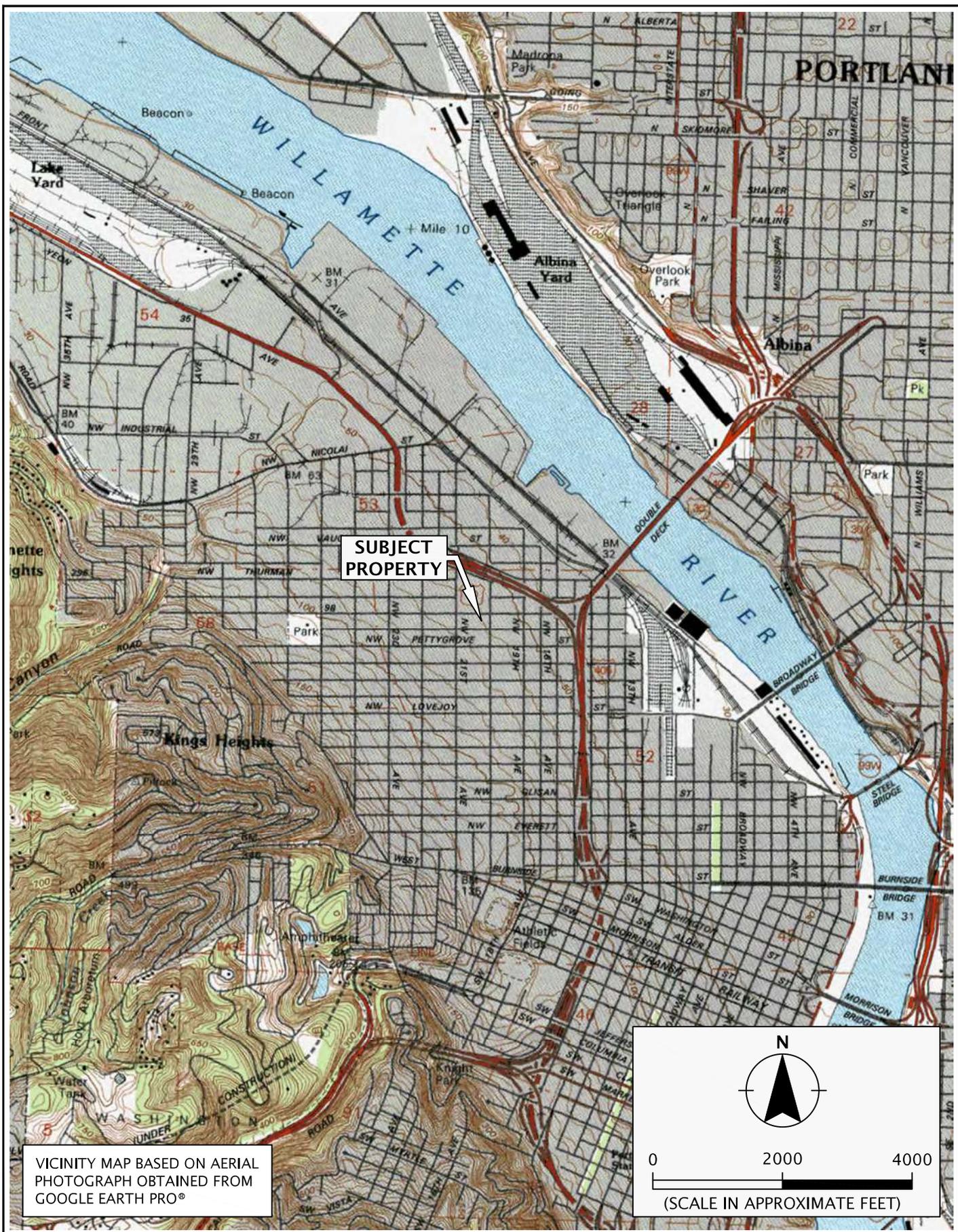
Sincerely,

*Peter F Donahower*

Peter Donahower, Manager  
Northwest Region Petroleum Cleanup Section

Attachment(s): Figure 1 – Vicinity Map  
Figure 2 – Site Plan – Residual Contaminated Soil

cc: Rebecca Digiustino, DEQ Project Manager  
LUST #26-22-0118 File



VICINITY MAP BASED ON AERIAL PHOTOGRAPH OBTAINED FROM GOOGLE EARTH PRO®

	CAIRNPAC-14-08	<b>VICINITY MAP</b>	
	NOVEMBER 2022	FREEWELL SITE PORTLAND, OR	<b>FIGURE 1</b>

**DRAFT**

FIGURE 4

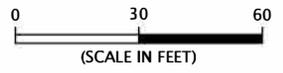
SITE PLAN - RESIDUAL CONTAMINATED SOIL  
FREEMWELL SITE  
PORTLAND, OR

CAIRNPAC-14-08  
NOVEMBER 2022

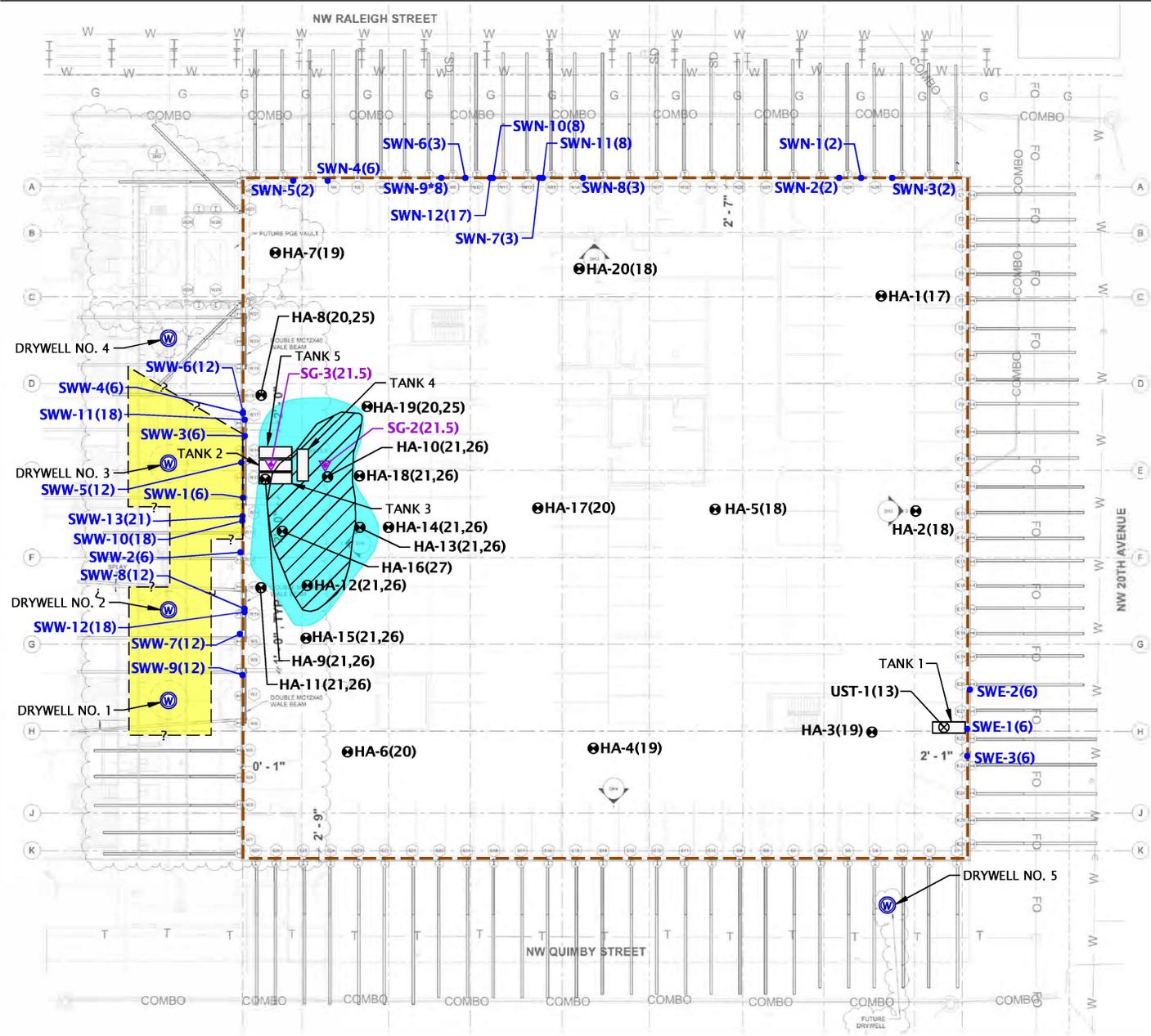
**NV5**

- LEGEND:**
-  MASS EXCAVATION LIMIT (APPROXIMATELY 20 FEET BGS)
  -  SWN-1(2) • SIDEWALL CONFIRMATION SAMPLE
  -  HA-1(17) ⊙ HAND AUGER BORING/BOTTOM OF EXCAVATION CONFIRMATION SAMPLE
  -  SG-2(21.5) ▼ SOIL GAS SAMPLE
  -  UST-1(13) ⊗ UST CONFIRMATION SAMPLE
  -  TANK
  -  DRYWELL

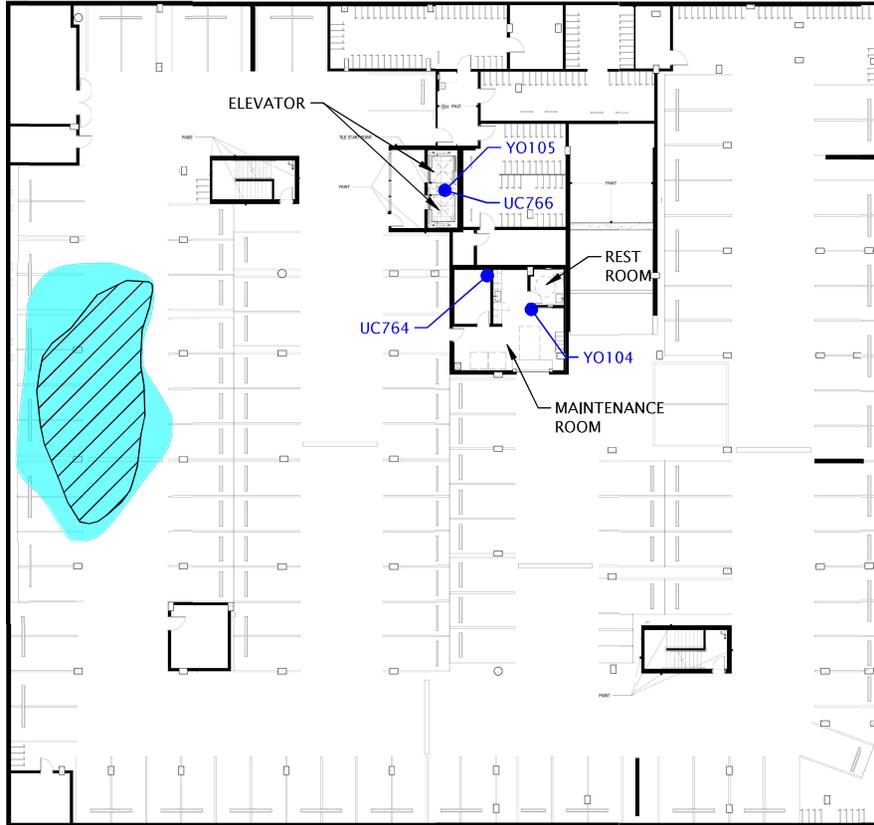
ESTIMATED RESIDUAL CONTAMINATION	
LATERAL EXTENT	DEPTH (FEET BGS)
	0 - 5
	20 - 21
	26 - 27



SITE PLAN BASED ON SHEET SH2 SHORING PLAN DATED FEBRUARY 15, 2021, PREPARED BY PACIFIC STRUCTURAL SOLUTIONS, LLC

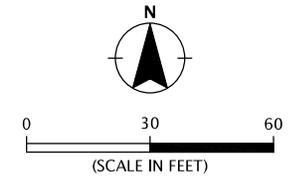


Printed By: rmillier | Print Date: 11/22/2022 3:46:11 PM  
File Name: J:\VAD\CairnPac\CairnPac-14-08\Figures\CAD\CRR\CairnPac-14-08-SP03.dwg | Layout: FIGURE 4

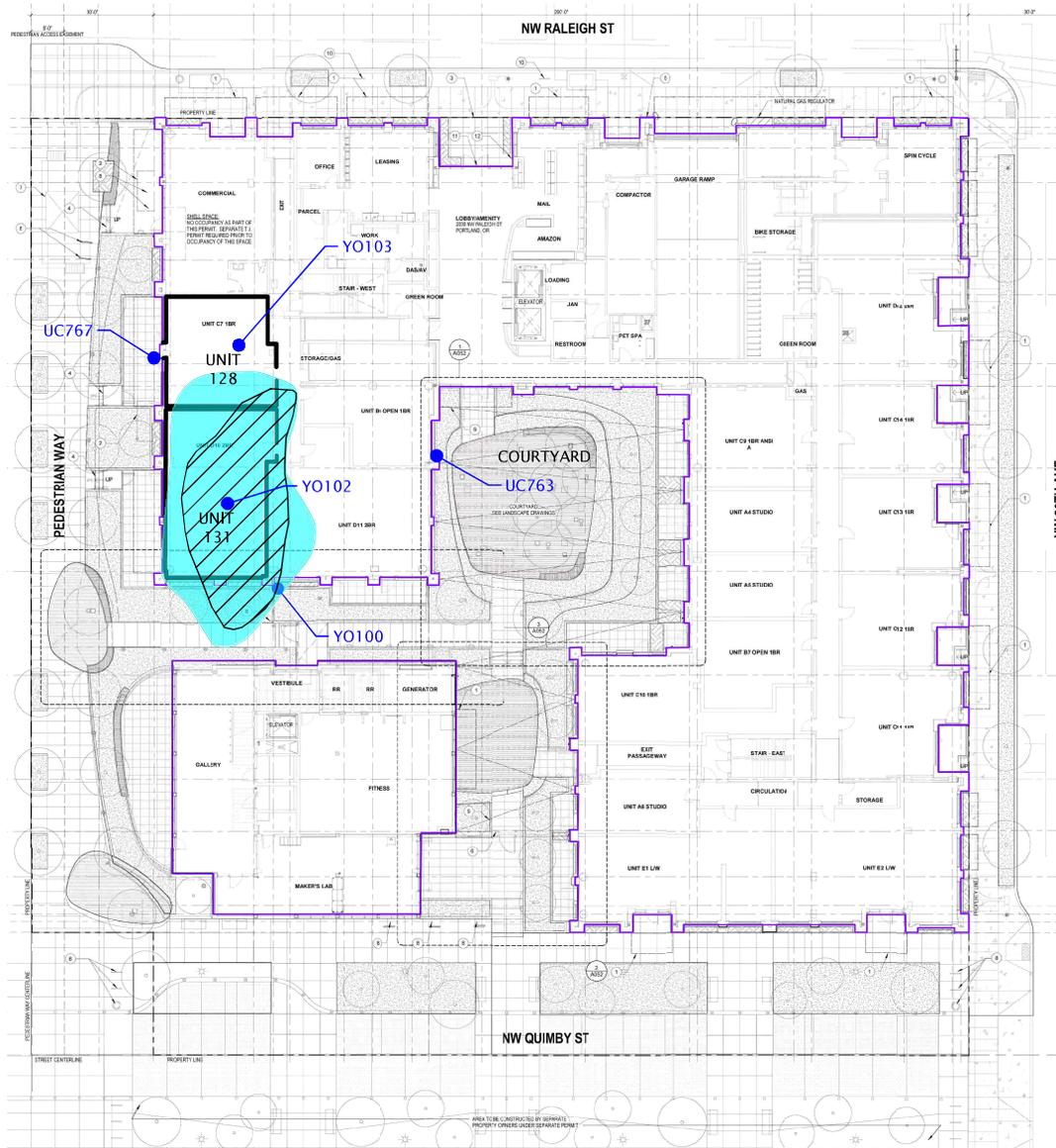


**LEGEND:**  
 YO104 ● RADIELLO AIR SAMPLER LOCATION

ESTIMATED RESIDUAL CONTAMINATION	
LATERAL EXTENT	DEPTH (FEET BGS)
	20 - 21
	26 - 27

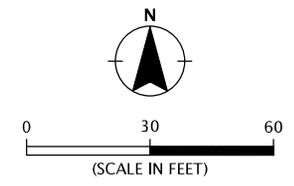


SITE PLAN BASED ON IMAGE OF SHEET A2P1  
 REFLECTED CEILING PLAN - LEVEL P1, DATED  
 JUNE 22, 2021, PREPARED BY SERA



**LEGEND:**  
 YO100 ● RADIELLO AIR SAMPLER LOCATION

ESTIMATED RESIDUAL CONTAMINATION	
LATERAL EXTENT	DEPTH (FEET BGS)
	20 - 21
	26 - 27



SITE PLAN BASED ON IMAGE OF SHEET A1P1M  
 FINISH PLAN - LEVEL 1, DATED JUNE 22, 2021,  
 PREPARED BY SERA

