



# CITY OF PORTLAND ENVIRONMENTAL SERVICES



The Portland Building ■ 1120 SW Fifth Ave, Suite 613, Portland, Oregon 97204 ■ Dawn Uchiyama, Director

December 23, 2024

Jim Orr, R.G.  
Oregon DEQ, Northwest Region  
700 NE Multnomah Street, Ste. 600  
Portland, OR 97232

Re: Opportunity to Comment Letter  
Former Firestone Site, LUST 26-94-0026

Dear Mr. Orr:

The City of Portland received your e-mail regarding public comment on the requested no further action (NFA) determination for the Former Firestone Site, located at 815 W Burnside St Portland, Oregon 97209.

The City of Portland supports this determination and acknowledges that residual contamination is present at the site. Based on our review of the documentation provided, contaminated soil and groundwater related to the site is present within City Right-of-Way (ROW). The contamination may impact city utility and roadway construction or maintenance activities.

Please inform the property owner that their legal responsibility includes costs incurred by the City of Portland for any necessary characterization, mitigation, handling, increased personal protective equipment, management, transportation, and disposal of any contaminated media or hazardous waste encountered and/or generated while performing surface and subsurface activities within the public ROW adjacent to the site. These activities may include, but are not limited to, construction, repair, and/or maintenance of City assets. Additionally, if any underground storage tanks associated with site remain in the public ROW, the property owner must decommission the tank to a minimum of five feet below grade in accordance with administrative rule TRN-10.14.

Sincerely,

Brian Marcum, P.E.  
Engineer I  
BES, Coordinated Site Assessment Program  
503-823-8672

c. John O'Donovan, City of Portland BES  
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