



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region
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[Date]

Jennifer Pittsley
1535-A1, LLC
2495 NW Nicolai Street
Portland, Oregon 97210

RE: Conditional No Further Action Determination
Former ESCO Main Plants #1 and #2
ECSI # 6285

Dear Jennifer Pittsley:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information for the Former ESCO Main Plants #1 and #2 (the site), including the *Site Characterization, Remedial Action and Residual Risk Assessment Report*¹, the *Building #4 Vapor Intrusion Investigation Report*², and the *Building #4 Additional Vapor Intrusion Investigation Report*³ which were submitted to DEQ by Point Source Solutions, LLC on your behalf. The site address is 2141 NW 25th Avenue, Portland, Oregon 97210, and includes Multnomah County tax lots 1N1E29DD00100 (0.25 acres), 1N1E29DD01600 (0.25 acres), 1N1E28C00100 (15.57 acres), 1N1E29DA01700 (2.36 acres), 1N1E28C00300 (0.35 acres) and 1N1E28CB00800 (0.15 acres).

DEQ has determined that remedial action to address environmental contamination at the site is complete, and no further action is required with conditions. 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, and as more fully described in DEQ's Staff Memo⁴:

- The primary historical use of the Site was by The Electric Steel Corporation (ESCO), which operated a foundry between 1913 through 2016. Prior to ESCO's use, the Site included residences, a school and the Lewis & Clark Centennial Exhibition grounds. The only remaining building is currently used by a roller coaster repair company. Limited portions of the property are used for material storage.
- Releases of contamination associated with ESCO's historical activities resulted in soil and soil vapor contamination. Soil contamination primarily includes polycyclic aromatic hydrocarbons (PAH), petroleum hydrocarbons, and arsenic. Soil gas contamination includes benzene and naphthalene. Chloroform and 1,4-dioxane were also detected in soil gas. Acrolein was detected in soil gas, indoor air, and outdoor air. Acrolein may be associated with interference from sampling equipment, background, ongoing site operations, and/or historical releases.

¹ Point Source Solutions. 2025. Site Characterization, Remedial Action and Residual Risk Assessment Report, Former ESCO Main Plant #1,#2, 2141 NW 25th Avenue, Portland, Oregon 97210, ECSI #6285. April 30. Available Online: <https://ormswd2.synergydcs.com/HPRMWebDrawer/Record/6900931>

² Point Source Solutions. 2025. Building #4 Vapor Intrusion Investigation Report, ECSI No. 6285. September 26. Available Online: <https://ormswd2.synergydcs.com/HPRMWebDrawer/Record/7006408>

³ Point Source Solutions. 2025. Building #4 Additional Vapor Intrusion Investigation Report, ECSI No. 6285. November 21. Available Online: <https://ormswd2.synergydcs.com/HPRMWebDrawer/Record/6992269>

⁴ DEQ. 2026. Staff Memorandum in Support of a Conditional No Further Action Determination, Former ESCO Plants #1 and #2, ECSI #6285. January 23. Available Online: <https://ormswd2.synergydcs.com/HPRMWebDrawer/Record/7013805>

- During facility demolition, approximately 7,017 tons of impacted soil was excavated and transported to the Waste Management Hillsboro Landfill. Additional removal of contaminated soils occurred subject to several LUST cases, which received No Further Action determinations.
- This Site is zoned EG1-General Employment and IH-Heavy Industrial by the City of Portland. The surrounding properties are zoned for commercial and light industrial use. Future development for these properties is expected to be for commercial purposes based on current zoning, however future rezoning to allow residential development is possible.
- The Site and surrounding properties are all provided water by the City of Portland. No drinking water wells within 1,000 feet of the Site were identified. There are no surface water bodies within the locality of facility. Based on these factors, there are no groundwater beneficial uses.
- Residual soil contamination includes individual PAHs, benzo(a)pyrene toxic equivalents, arsenic, and petroleum hydrocarbons. Residual soil gas contamination includes benzene, naphthalene, acrolein, carbon tetrachloride, and 1,4-dioxane. Soil gas does not indicate unacceptable risk for ongoing occupational use of Building #4.
- Current receptors include occupational users, construction workers, and excavation workers. Benzo(a)pyrene toxic equivalents, total petroleum hydrocarbons, and arsenic exceed occupational RBCs in certain portions of the sites. Existing caps and restriction of site use control potential exposures to occupational receptors. There are no exceedances of construction worker or excavation worker RBCs.
- On [date], an Easement and Equitable Servitudes was filed with Multnomah County restricting site and groundwater use, requiring maintenance of existing caps, requiring implementation of the *Contaminated Materials Management Plan*⁵, and requiring future vapor intrusion evaluations prior to future building construction.

Based on the available information, environmental conditions at the site are currently protective of public health and the environment in accordance with Oregon environmental cleanup law, ORS 465.200 et seq. 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 information system 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. Any on-site monitoring wells should be maintained or decommissioned in accordance with Oregon Water Resources Department regulations.

A copy of applicable project documentation and DEQ's Staff Memo supporting this Conditional No Further Action decision can be viewed on the Your DEQ Online database and at the links provided herein. 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 Wesley Thomas at (971) 263-8822, or via email at Wesley.Thomas@deq.oregon.gov.

⁵ Point Source Solutions. 2026. Contaminated Materials Management Plan, Former ESCO Main Plant #1,#2, 2141 NW 25th Avenue, Portland, Oregon 97210. January 23. Available Online: <https://ormswd2.synergydcs.com/HPRMWebDrawer/Record/7013488>

Sincerely,

Amanda Wozab
Section Manager
Northwest Region Cleanup Section

cc: Jim Orr, DEQ
Ray Hoy, DEQ
Gil Cobb, Point Source Solutions
Connor McGeehan, Point Source Solutions
Jennifer Gates, Pearl Legal Group
ECSI #6285 File