



# Oregon

Kate Brown, Governor

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

March 2, 2026

Corey Raspone  
250 SW Taylor St.  
Portland, OR 97204

RE: No Further Action Determination  
for NW Natural in Portland  
LUST #26-21-0510

Dear Mr. Raspone:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information for the NW Natural site, including the closure reports entitled *Technical Memorandum*, dated September 7, 2021, and *UST Removal and Risk-Based Closure Report*, dated February 4, 2022, which were submitted to DEQ by Hydrocon on your behalf. The NW Natural site is located at 2600/2630 SE 9<sup>th</sup> Avenue, Tax Lot 6900 on Multnomah County tax map 1S1E11BA.

DEQ has determined that remedial action and investigation to address environmental contamination at NW Natural 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:

- The site is the former Northwest Natural Central Service Center and Portland Gas & Coke Company facility-gas holding facility. Four underground storage tanks (USTs), storing gasoline, diesel, and waste oil, were previously decommissioned and the associated petroleum releases were cleaned up under DEQ LUST file number 26-95-0218. A no further action letter was issued in 1996.
- A comprehensive site wide investigation and associated remedial actions were performed through the voluntary cleanup program under ECSI No. 1488. The site was issued a conditional no further action determined in October 2018. As part of the closure, institutional controls in the form of an easement and equitable servitudes (EES) was recorded with Multnomah County. The EES prohibits beneficial use of shallow groundwater and requires the property to remain zoned for industrial use.
- During site redevelopment activities, in May 2021, a 10,000-gallon UST was encountered. An 8,000-gallon UST was later encountered in August 2021. Both USTs had been decommissioned in-place, filled with sand, and were encountered in the same vicinity as two 10,000-gallon USTs decommissioned by removal in 1995.
- The sand fill used to decommission the two USTs in place was removed. The USTs were then removed through excavation.
- Petroleum contamination occurred from leakage of gasoline, diesel, and heavy oil from the USTs. Some of this contamination may be from earlier releases, but that was not discussed. Up to 89.5 milligrams per kilogram (mg/Kg) of gasoline and 1,030 mg/Kg of diesel were detected at the 8,000-gallon UST. Confirmation soil sampling at the 8,000-gallon UST indicates that results were non-detect at 13 feet below ground surface (bgs). Up to 582 mg/Kg of gasoline and 10,600 mg/Kg of diesel were detected and, while removed, no confirmation samples were collected to verify remaining concentrations in this area. As a result, it is unclear if petroleum-contaminated soil remains in-place in this area. However, since a contaminated media management plan (CMMP) is required per the EES

for ECSI 1488 associated with this property, risks will be addressed if excavation occurs in this area, discussed below.

- During tanks removal up to 282.46 tons of soil were excavated and transported to Hillsboro Landfill. Up to 212 tons of soil were transported to Arlington as hazardous waste due to high lead detections. Up to 1,900 gallons of rinsate/product were transported to ORRSCO in Portland, Oregon for recycling. The USTs were recycled at Rivergate Scrap Metals in Portland, Oregon.
- Soil is the only affected media.
- The property is zoned General Industrial (IG2), which does not allow residential use. Continued future use is industrial as the Northwest Natural Central Service Center. Water is provided by the City's municipal supply and will continue to be. The EES prohibits use of shallow groundwater.
- Diesel exceeds screening levels for construction workers. To protect workers and per the conditional NFA for ECSI 1788, an updated CMMP was prepared for the site (dated June 10, 2024) to inform workers about residual site hazards that may become complete pathways during future excavation and construction activities. All results are below indirect pathways for occupational receptors. Remaining petroleum concentrations are at least 9 feet below ground surface.
- The closest surface water body is the Willamette River, approximately 1,200-feet toward the west. The river is unlikely to be impacted by this release. As a result, there are no ecological impacts from this release.

Based on the available information, soil conditions at NW Natural 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 Leaking UST database to reflect this decision.

This letter only applies to the release 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 Hydrocon (now ACC Environmental) closure reports supporting this No Further Action and CMMP decision can be viewed at <https://ordeq.org/LUST-26-21-0510> in the YDO database. DEQ recommends keeping a copy of all 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).

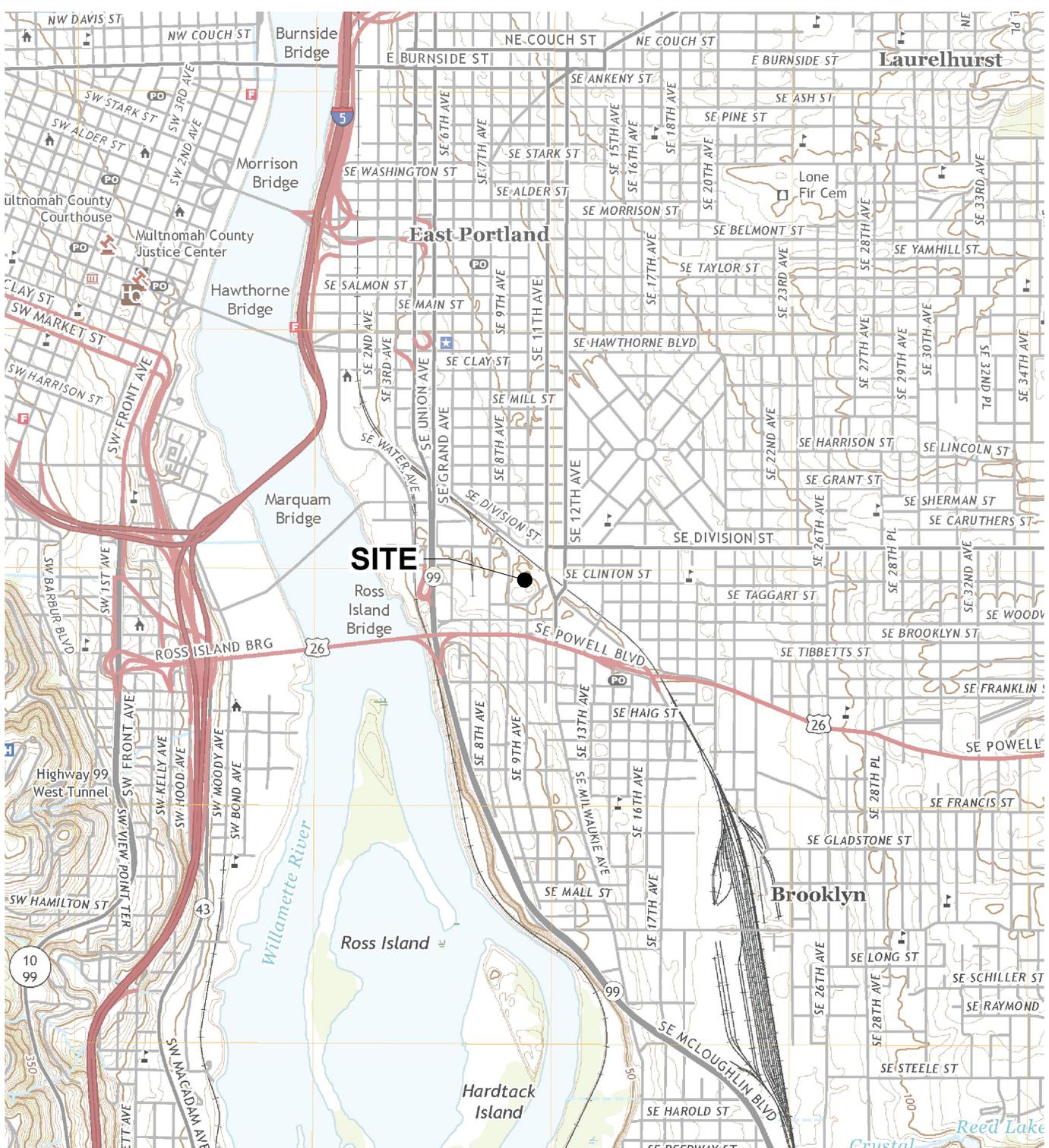
Sincerely,



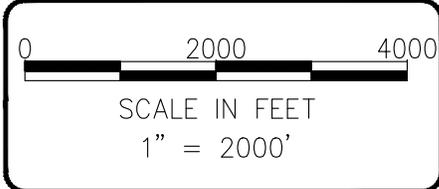
Kevin Parrett, Manager  
Northwest Region Cleanup Section

Attachments: Figures 1-3

cc: ACC Environmental-Chris Sheridan  
LUST #26-21-0510 File



**NOTE(S):**  
 USGS, LAKE OSWEGO AND PORTLAND QUADRANGLES  
 OREGON-CLACKAMAS, MULTNOMAH, AND WASHINGTON COS.  
 7.5 MINUTE SERIES (TOPOGRAPHIC)



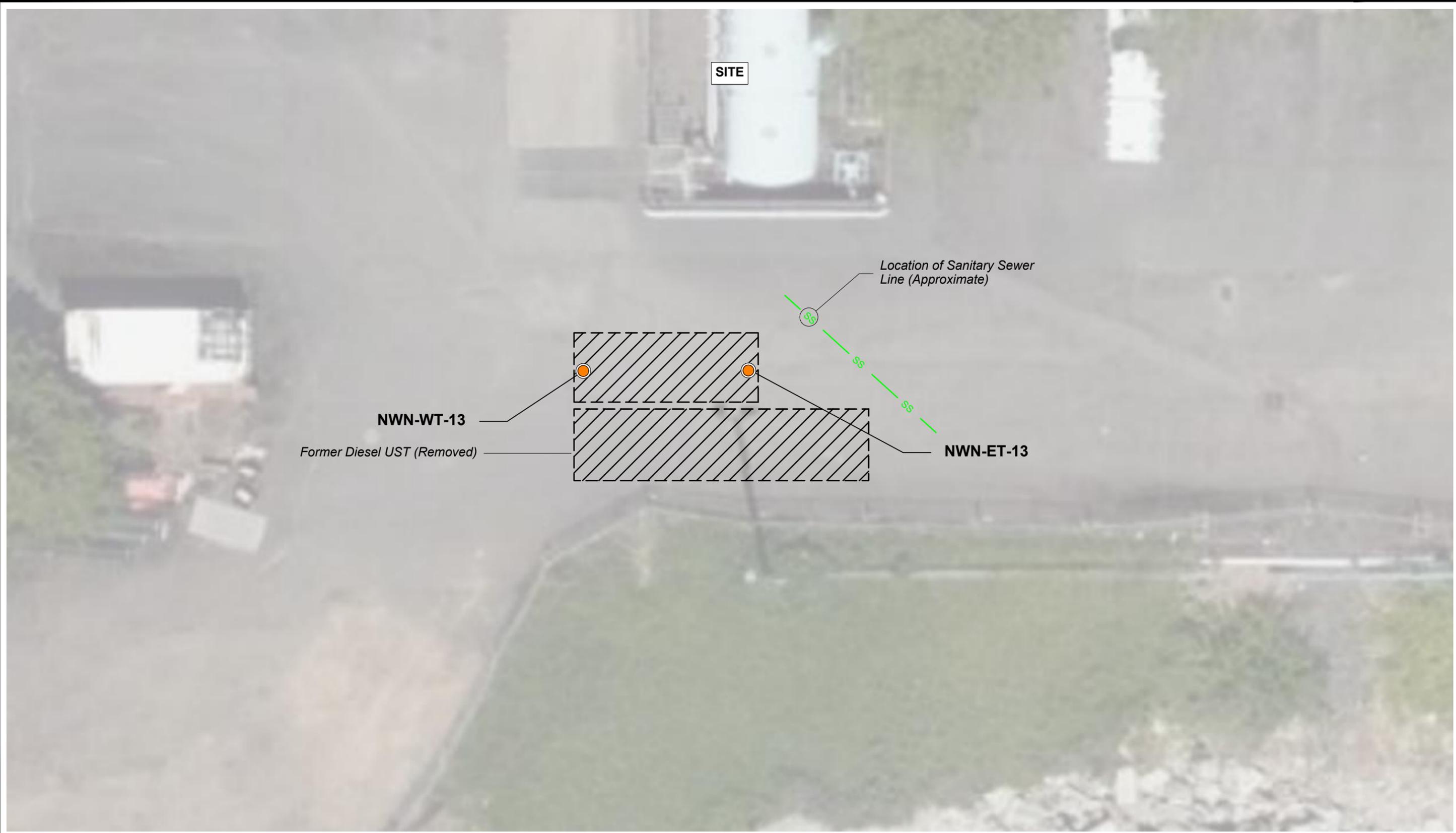
S:\2021 Projects\2021-061 MEI NW Natural\Figures\CAD\2021-061\_NW Natural UST.dwg



314 W 15th Street, Suite 300, Vancouver, Washington 98660  
 Phone 360.703.6079 Fax 360.703.6086

DATE: 6-14-21  
 DWN: MW  
 CHK: DB  
 APPROVED: DB  
 PRJ. MGR: DB  
 PROJECT NO:  
 2021-061

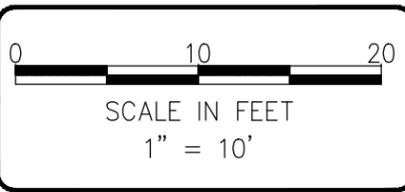
**FIGURE 1**  
 SITE LOCATION MAP  
 UST DECOMMISSIONING REPORT  
 MEI - NW NATURAL  
 2600 SE 9TH AVENUE  
 PORTLAND, OREGON



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**Legend**

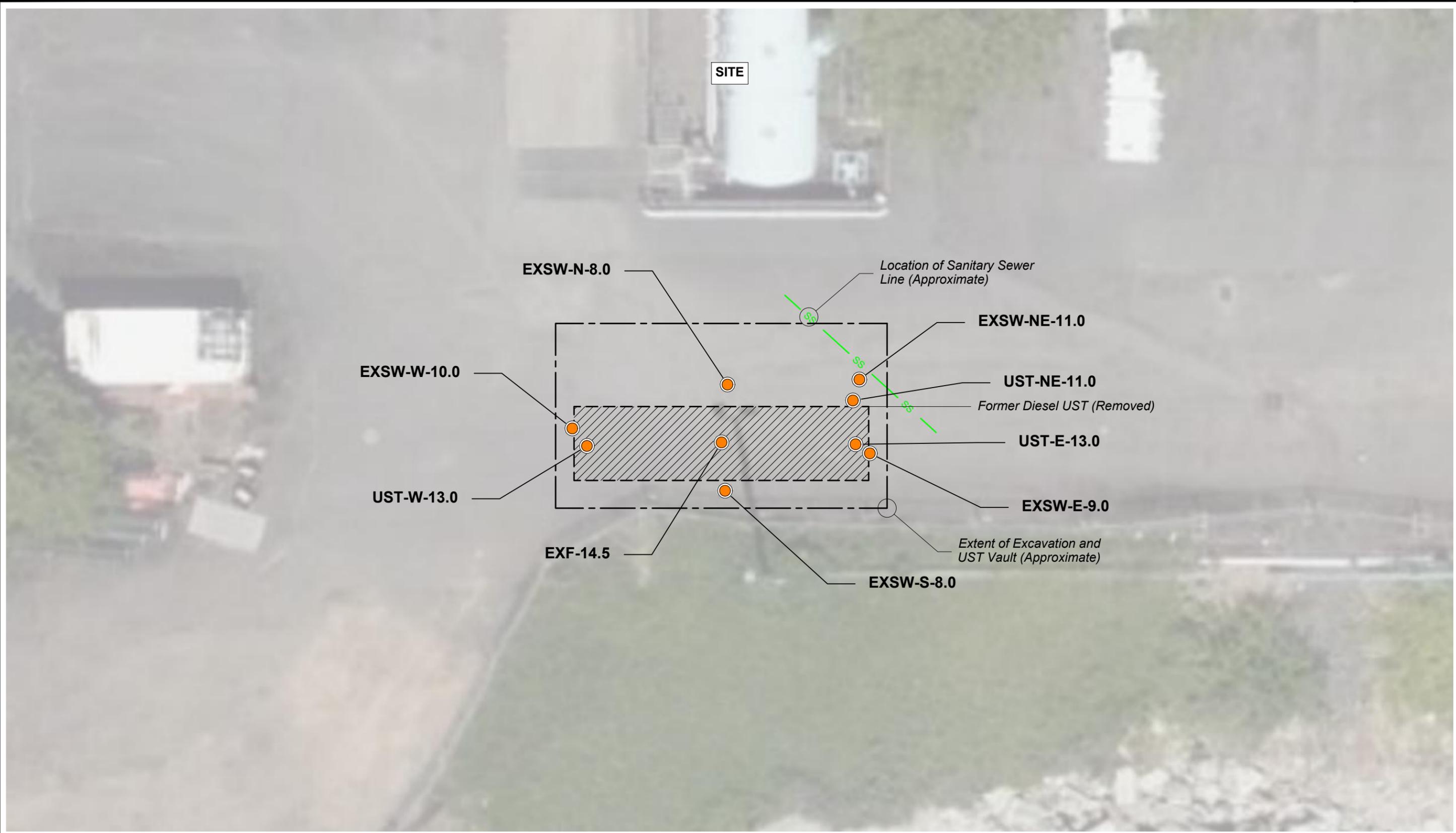
- NWN-ET-13.0 Soil Sample Location and Identification
- Former UST (Removed)



314 W 15th Street, Suite 300, Vancouver, Washington 98660  
Phone 360.703.6079 Fax 360.703.6086

DATE: 8-31-2021  
DWN: LC  
CHK: SC  
APPROVED: SC  
PRJ. MGR: SC  
PROJECT NO:  
2021-061

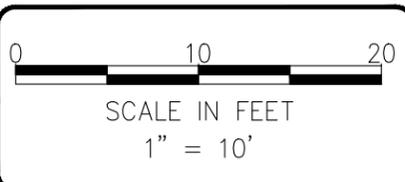
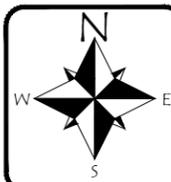
FIGURE 2  
SITE FEATURES AND SAMPLE LOCATIONS  
UST DECOMMISSIONING REPORT  
MEI - NW NATURAL  
2600 SE 9TH AVENUE  
PORTLAND, OREGON



S:\2021 Projects\2021-061 MEI NW Natural\Figures\CAD\2021-061\_NW Natural UST\_REV01.dwg

**Legend**

UST-E-13.0  Soil Sample Location and Identificatoin




314 W 15th Street, Suite 300, Vancouver, Washington 98660  
Phone 360.703.6079 Fax 360.703.6086

DATE: 6-16-21  
DWN: MW  
CHK: DB  
APPROVED: DB  
PRJ. MGR: DB  
PROJECT NO:  
2021-061

FIGURE 3  
SITE FEATURES AND SAMPLE LOCATIONS  
UST DECOMMISSIONING REPORT  
MEI - NW NATURAL  
2600 SE 9TH AVENUE  
PORTLAND, OREGON