

Portland Harbor Natural Resource Damage Assessment Phase 2: Allocation Summary Memo for the American Car Foundry Industries (ACF Industries)

1.0 INTRODUCTION

American Car Foundry Industries (ACF Industries), an owner and operator of one site in Portland Harbor, has engaged in activities resulting in releases of substances of concern. As part of the Portland Harbor natural resource damage assessment (NRDA) Phase 2 process, and for settlement purposes only, the Trustee Council developed a site-specific allocation of natural resource damages liability for one site with which ACF Industries is associated, Site 68.¹ That liability is determined in units of discounted service acre-years (DSAYs). Based on the information gathered throughout the Phase 2 process, methods described in the Trustee Council's allocation methodology report, and data and assumptions described below, ACF Industries' liability is calculated to be 0.70 DSAYs.

This memorandum summarizes the information the Trustee Council utilized to develop the allocation, and is organized as follows:

- ❖ Section 2 provides background information.
- ❖ Section 3 describes general operations at the ACF Industries site.
- ❖ Section 4 outlines ACF Industries' activities at their site.
- ❖ Section 5 is a list of references.

¹ The allocation presented in this memorandum is limited to an allocation of natural resource damages liability by the Trustee Council and does not inform or have any application relative to other environmental liabilities associated with the Portland Harbor Superfund Site, including but not limited to remedial liability. The use of "allocation" or "liability" in this memorandum refers only to the Trustee Council's settlement-oriented allocation of natural resource damages liability.

2.0 OVERVIEW OF ACF INDUSTRIES' SITE

Exhibit 2-1 is a map of the ACF Industries site included in their allocation, and Exhibit 2-2 outlines background information for the site. The relevant tax lot parcel is described in Appendix A of the Consent Decree associated with the settlement of natural resource damages for this parcel.

EXHIBIT 2-1 MAP OF ACF INDUSTRIES SITE

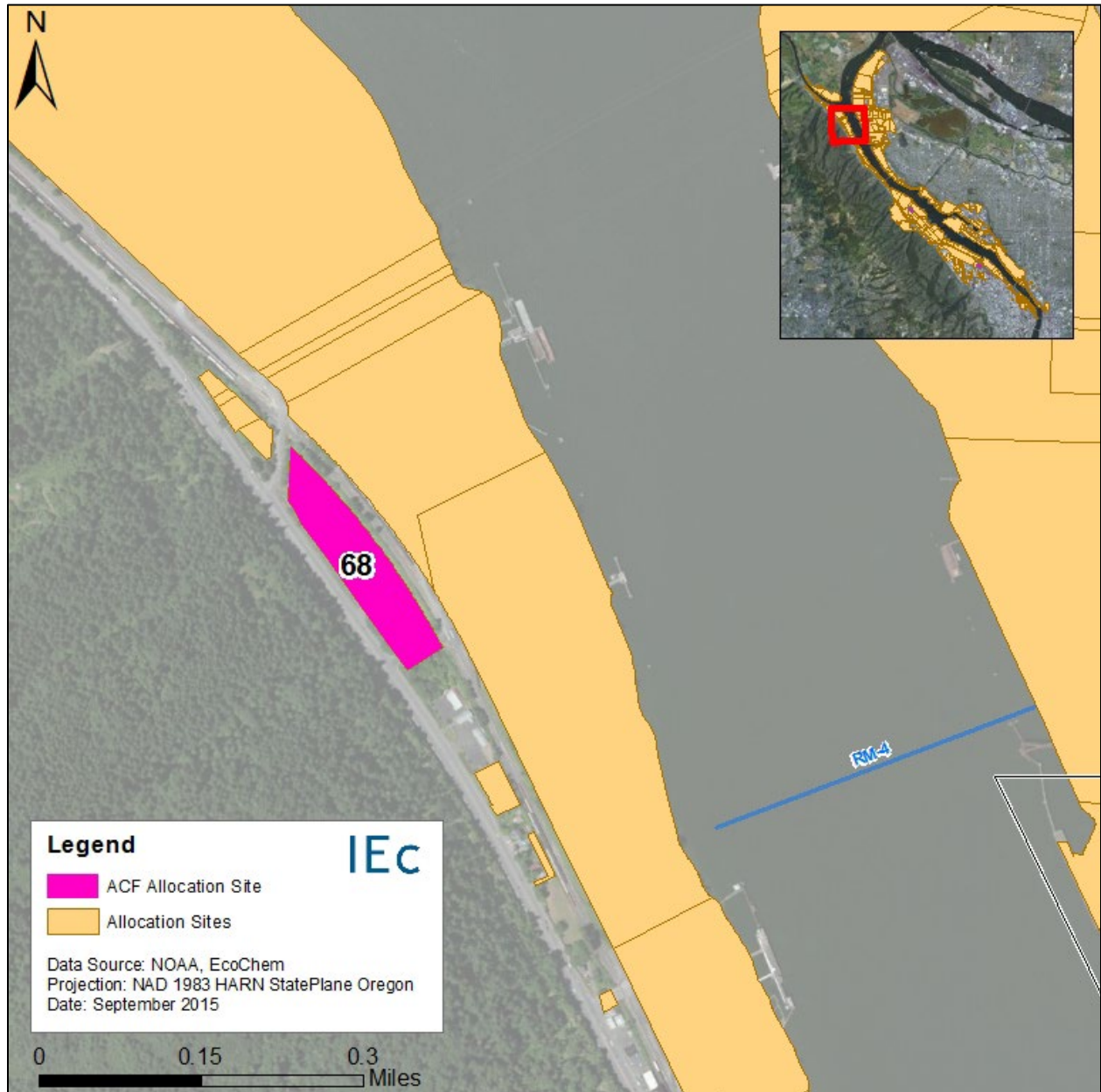


EXHIBIT 2-2 ACF INDUSTRIES SITE BACKGROUND INFORMATION

SITE ID	ADDRESS	CURRENT OWNER	ACF DATES OF OWNERSHIP	ACF DATES OF OPERATION	SITE ACREAGE
68	12160 NW Street Helens Road, Portland, OR	ACF Industries	37 years (1968-1980) (1988-Present)	12 years (1968-1980)	5.98

3.0 ACF INDUSTRIES' OWNERSHIP AND OPERATIONS

The following section briefly describes ACF Industries' ownership and operations at the site listed in Exhibit 2-2.

Site 68

Site 68 is located upland, about 800 feet west of the Willamette River at River Mile 3.5. The Property (i.e., Site 68) was undeveloped until the early 1930s when Kingsley Lumber purchased the Property for lumber mill operations. In 1957, Richmond Tank Car Manufacturing leased a portion of the Property for repairing and repainting railroad tank cars. Richmond Tank Car Manufacturing purchased the Property from Kingsley Lumber in 1965 and continued operations there until 1968. In 1968, the Property was purchased by ACF Industries. ACF Industries' operations, which included cleaning, sandblasting, repair and repainting of rail cars, continued until 1980 when the Property was sold to Hazard/McCarthy. Hazard/McCarthy leased the Property to Pacific Metal Substation for metal fabrication and transformer repair from 1981 to 1984. EMC Industries leased the Property for wooden crate/pallet fabrication from 1986 to 1988. ACF Industries reacquired the Property in 1988 and began clean-up, including the removal of all above-ground structures. ACF Industries is the current owner of the now-vacant Property.

4.0 ACF INDUSTRIES ACTIVITIES

Exhibit 4-1 identifies, for ACF Industries' property in Appendix A of the Consent Decree, the activities that had the potential to result in the release of one or more of the substances of concern included in the Trustee Council's evaluation of natural resource damages. These types of activities are further described in the Trustee Council's allocation methodology report.

EXHIBIT 4-1 ACF INDUSTRIES-RELATED ACTIVITIES

ACF Industries Activities - Site 68
Aboveground storage tank - diesel
Underground storage tank (UST) - leaded gasoline
UST waste oil
Extensive vehicle operations or washing facilities
Unprotected storage of petroleum contaminated soil
Unprotected storage of spent sandblasting grit

5.0 REFERENCES

Lower Willamette Group. 2009. Portland Harbor Draft Remedial Investigation Report. Prepared by Integral Consulting, Inc., Windward Environmental LLC, Kennedy/Jenks Consultants, and Anchor QEA, LLC.

Oregon Department of Environmental Quality. 2013. Environmental Cleanup Site Information Database.

<https://www.deq.state.or.us/lq/ECSI/ecsiquery.asp?listtype=lis&listtitle=Environmental+Cleanup+Site%20Information+Database>

Portland Harbor Natural Resource Trustee Council. 2022. Portland Harbor Natural Resource Damage Assessment: Allocation Methodology Report. Prepared by Industrial Economics, Incorporated.

The Trustee Council also reviewed three additional documents submitted by Phase 2 parties that are settlement confidential and therefore not identified.