

Portland Harbor Natural Resource Damage Assessment

Phase 2: Allocation Summary Memo for Beazer East, Inc.

1.0 INTRODUCTION

Beazer East Inc. (Beazer), an operator at 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 party-specific allocation of natural resource damages liability for one site with which Beazer is associated, Site 123.¹ 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, Beazer's liability is calculated to be 6.9 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 Beazer site.
- ❖ Section 4 outlines Beazer's 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 BEAZER SITE

Exhibit 2-1 is a map of the Beazer site included in their party-specific 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 BEAZER SITE

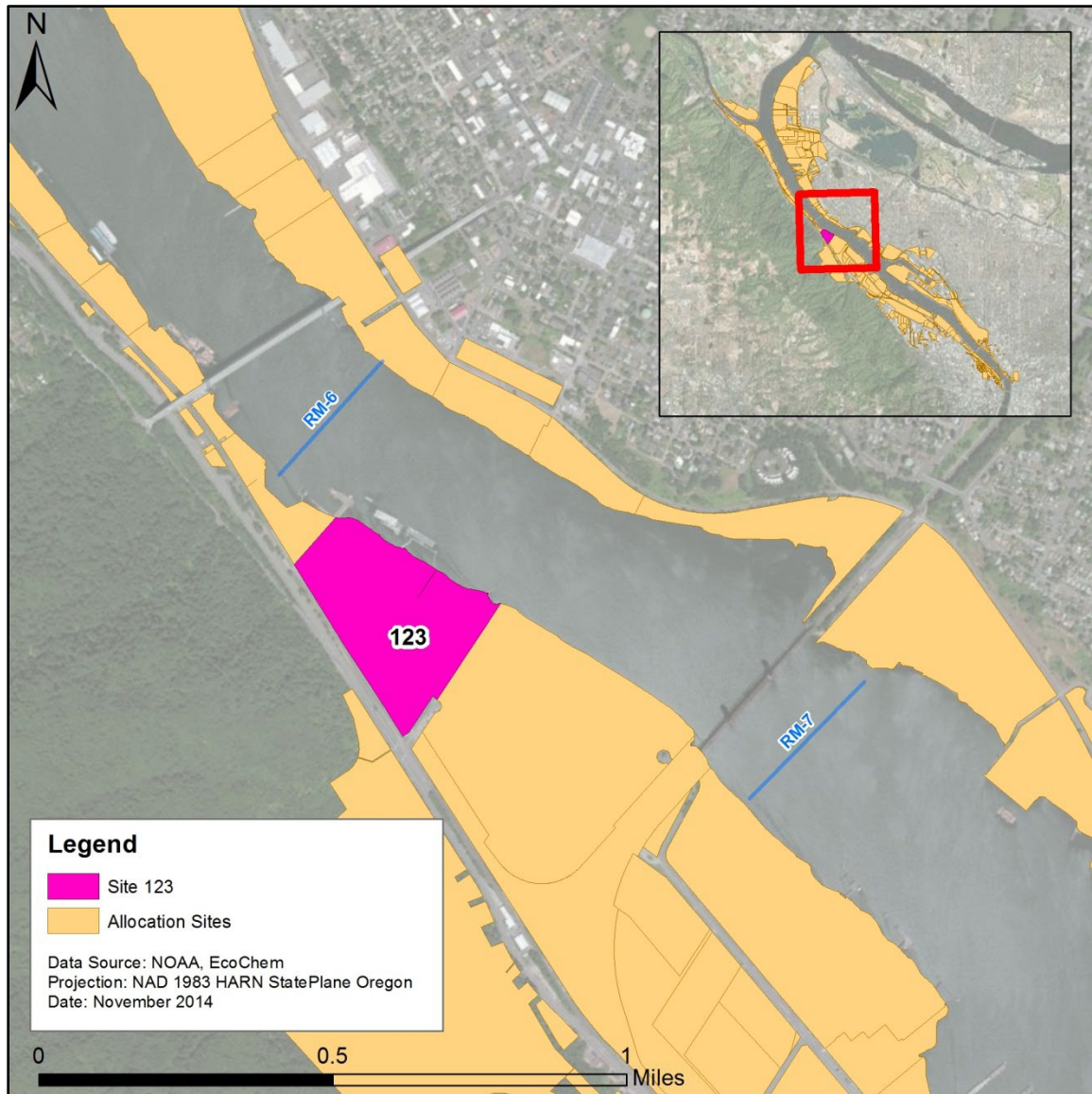


EXHIBIT 2-2 BEAZER SITE BACKGROUND INFORMATION

SITE ID	ADDRESS	CURRENT OWNER	BEAZER DATES OF OWNERSHIP	BEAZER DATES OF OPERATION	SITE ACREAGE
123	7540 NW St Helens Rd Portland, Oregon	Northwest Natural (1910 - Present)	none	1965-12/27/1988	7.6 of 44.65 total site acres

3.0 BEAZER OPERATIONS

The following section briefly describes Beazer's operations at Site 123.

SITE 123 (NW Natural)

Prior to Beazer's lease from 1965-1988, a small portion of NW Natural's manufactured gas plant operations included a light oil plant on what became Beazer's leased property. From 1966-1973, Beazer distilled coal tar on the leased parcel to produce chemicals, oil, creosote, and pitch. In 1973, coal tar distillation activities ceased due to lack of raw materials. For a short period from 1973-1977, test batches of petroleum and coal tar distillation occurred, but had little marketability. From 1977 to 1988, the leased property was used exclusively as a terminal for the receipt, storage, and distribution of pitch and, to a lesser extent, creosote. In 1988, Koppers, Inc. took over coal tar pitch storage and distribution activities and currently operates there today.

4.0 BEAZER ACTIVITIES

Exhibit 4-1 identifies, for Beazer's 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 BEAZER-RELATED ACTIVITIES

Beazer Activities - Site 123
Aboveground storage tank - other petroleum/unknown petroleum
Coal tar distillation plant operations
Coal tar pitch distribution
Landfill of coal tar distillates
Disposal of coal tar distillation wastewater
Oil/water separation/filtration use
Petroleum leaks/spills
Ship berthing

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 15 additional documents submitted by Phase 2 parties that are settlement confidential and therefore not identified.