

Portland Harbor Natural Resource Damage Assessment Phase 2: Allocation Summary Memo for Calbag Metals Co.

1.0 INTRODUCTION

Calbag Metals Co. (Calbag), an owner and operator of sites 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 eight sites with which Calbag is associated: 61, 194, 467, 512, 563, 572, 652, and 653.¹ 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, Calbag's liability is calculated to be 0.042 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 Calbag's sites.
- ❖ Section 4 outlines Calbag's activities at their sites.
- ❖ 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 CALBAG SITES

Exhibit 2-1 is a map of the Calbag sites included in their party-specific allocation, and Exhibit 2-2 outlines background information for each of these sites. The relevant tax lot parcels are described in Appendix A of the Consent Decree associated with the settlement of natural resource damages for these parcels.

EXHIBIT 2-1 MAP OF CALBAG SITES

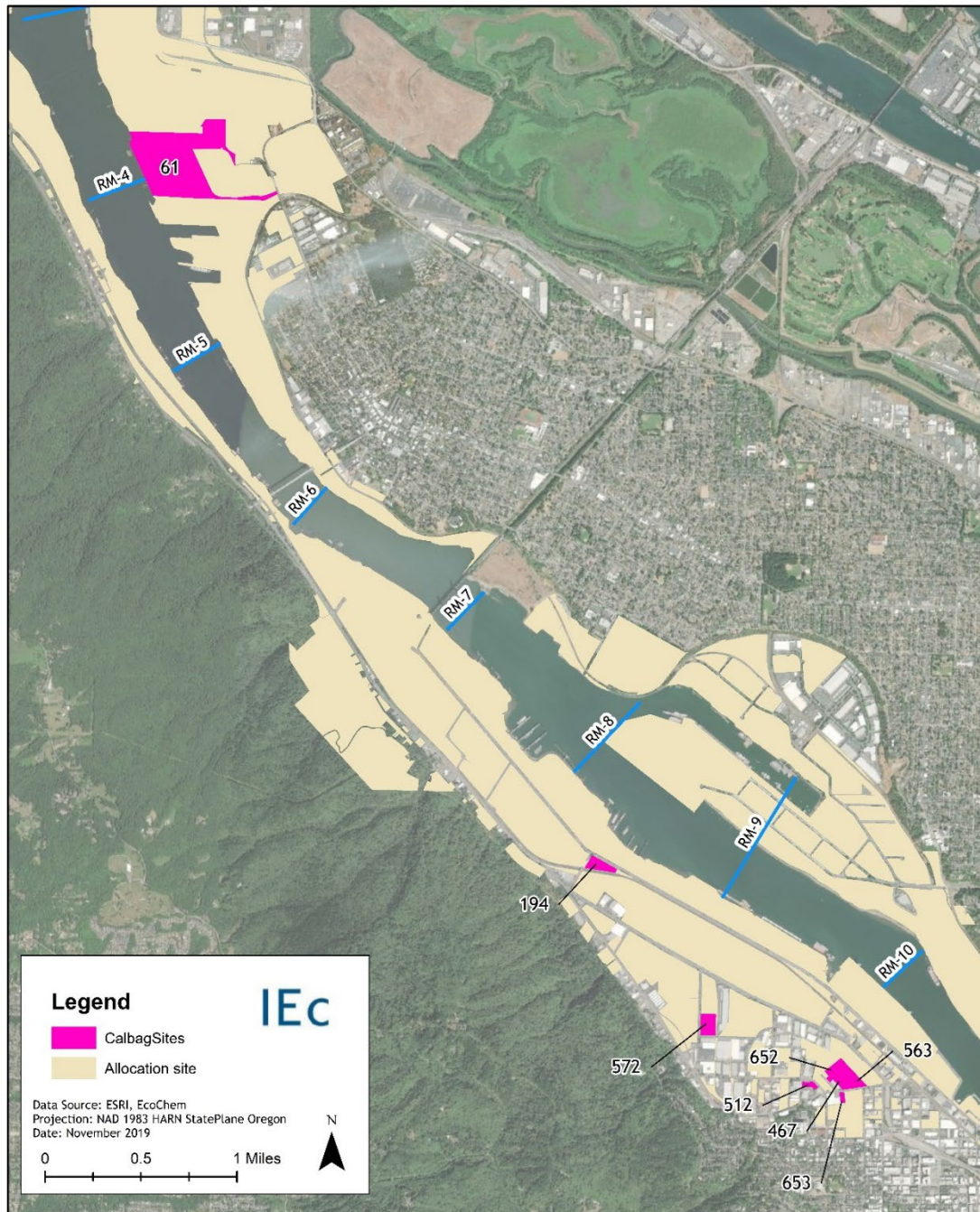


EXHIBIT 2-2 CALBAG SITE BACKGROUND INFORMATION

SITE ID	ADDRESS¹	CURRENT OWNER	CALBAG DATES OF OWNERSHIP/ OPERATIONS	SITE ACREAGE
61	12005 N Burgard Rd	Schnitzer Steel Industries	1995 – 2008 Operator	89
194	4927 NW Front Ave	BDC Properties, LLC	1995 – 2003 Operator	4.7
467	2495 NW Nicolai St	Calbag Metals (Tax Lot 1N1E29DA-00100)	1945 – Present Owner/Operator	1.86
467	2622 NW 25 th Place	2495 NW Nicolai LLC (Other Tax Lots)	1990s – Present Operator	0.21
512	2710 NW Industrial St	Debannie LLC	2006 – Present Operator	1.4
563	2455 NW Nicolai St	Rosan Inc.	1950 – Early 1980s Owner 1950 – 1965 Operator	7.8
572	3441 NW Guam St	Standard Steel Property LLC	1957 – 1964 Owner/Operator	7.7
652	2530 NW 25 th Place	City of Portland	1995 – Present Operator	2.1
653	2500 NW Nicolai St	2500 NW Nicolai LLC	1960 – Present Operator	19

Note.

1. All addresses are located in Portland, Oregon.

3.0 CALBAG OWNERSHIP AND OPERATIONS

The following section briefly describes Calbag's ownership of and operations at the sites listed in Exhibit 2-2.

Site 61 (Schnitzer Burgard Industrial Park)

Site 61 is located on the east side of the river at river mile 4. During WWII, the property was part of the Oregon Shipbuilding Corporation and included the ship ways (the location of final ship assembly and launching) as well as a metals plate shop. Schnitzer Steel Industries, Inc. leased the property from 1972 to 2005 and purchased it in 2005 from MMGL. Schnitzer's operations have included ship dismantling, steel product manufacturing operations, and a scrap metal recycling facility which includes automobiles, appliances, discarded steel members, and other ferrous products. From 1995 to 2008, Calbag leased a 4.2-acre portion of the property (from MMGL and then Schnitzer) for non-ferrous metals recycling operations.

Site 194 (Calbag Metals – Front Street)

Site 194 is located on the west side of the river at river mile 8.4. Historically, this property was used as a machine repair shop and yard. Machinery was also sold from this location. From 1968 to 1995, Acme Trading and Supply Company operated a scrap metal recycling and recovery facility. Manufacturing Management, Inc. (MMI) acquired the business from Acme in 1990 and continued scrap metal yard operations until 1995. Calbag Metals acquired the business from MMI in 1995 and operated the scrap metal recycling and wire chopping facility while continuing to use the name Acme Trading and Supply Company. Much of the scrap metal recycling operations including retail business, outdoor storage of metals, and baling ceased in 1997. Certain activities continued, including wire chopping and cutting of oversized stainless steel, both of which occurred inside a warehouse. Calbag's operations ceased in 2003. Sol & Tillie Greenstein, Merle Greenstein & Stephen Cantor, and Greenstein Trust & Kesef Development are listed as the owners of the property from 1968 to 2006. BDC Properties, LLC purchased the property in 2006 and is the current owner.

Site 572 (Calbag Metals – Guam)

Site 572 is located on the west side of the river at river mile 9.2. Calbag (including predecessors California Bag & Metal Company and Calbag Steel Warehouse Company) owned and operated a steel distribution warehouse on the property from 1957 to 1964. Standard Steel Property LLC currently owns the property. ESCO leases a portion of the property for pattern storage and Portland Bolt & Manufacturing Company operates a hardware store on the other portion.

Nicolai Facility Sites (467, 512, 563, 652, 653):

Calbag's operations at the Nicolai Facility include purchasing used metals from post-consumer scrap, post-industrial scrap, and building demolitions; and purchasing new manufacturing scrap resulting from industrial processes and construction. After metals are received, they are sorted by type, processed, and prepared for shipment.

Site 467 (Calbag Metals – Nicolai)

Site 467 is located on the west side of the river at river mile 10.4. Since 1945, Calbag has owned one parcel of this property and operates a 67,281 sq. ft. main building for Calbag's main office, warehouse,

and scrap metal processing operations. Calbag has leased four tax parcels since the 1990s (exact year unknown) and uses those parcels for temporary outside storage of materials, including insulated wire (loose and on spools, covered by a tent), aluminum wire (not covered), and titanium (covered by a tent). From 1992 to 2002, Betty & Victor Rosenfeld owned the four tax parcels. Since 2002, 2495 NW Nicolai LLC has owned the four tax parcels.

Site 512 (Debannie LLC)

Site 512 is located on the west side of the river at river mile 10.1. Since 2006, Calbag has leased the property from the James & Harriet Horton Trust (owner from 2000-2018) and Debannie LLC (owner from 2018-present). Calbag performs wire chopping activities that recover copper and aluminum from electrical cables and aluminum window frames.

Site 563 (Rosan Inc.)

Site 563 is located on the west side of the river at river mile 10.2. Calbag owned the property from 1950 to the early 1980s and operated a storage yard for non-ferrous scrap metals from 1950 to 1965. Calbag sold the storage yard business in the 1960s and sold the property in the early 1980s. The property has been owned by Rosan Inc. since 2001 and is used by various companies for wholesale metals distribution, granite supply, and a construction contractor.

Site 652 (Calbag Metals NW 25th Pl)

Site 652 is located on the west side of the river at river mile 10.2. The City of Portland (City) has owned this property since the 1920s. From the late 1920s to the late 1940s, the City operated an incinerator on the northwest corner of the property. The resulting incinerator ash was landfilled on the adjacent site. From 1950 to 1979, West Coast Fast Freight used this site for storage and office space. Since 1995, Calbag has leased the Site from the City for scrap metal storage and large load receiving.

Site 653 (2500 NW Nicolai LLC)

Site 653 is located on the west side of the river at river mile 10.4. Since 1960, Calbag has leased the property and operated a scrap metal yard. Operations occur in a building that covers most of the property and include the compression of aluminum into cylinders (composited aluminum borings or 'pucks') and alloy/brass sorting and storage. Owners of the property include Betty & Victor Rosenfeld (1999 to 2002), Shaker Square LLC (2002 to 2015), and 2500 NW Nicolai LLC (2015 to present).

4.0 CALBAG ACTIVITIES

Exhibit 4-1 identifies, for each of Calbag’s properties 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 CALBAG-RELATED ACTIVITIES

Calbag Activities – Site 61
Oil/water separation/filtration use
Scrap metal yard operations
Calbag Activities – Site 194
Aboveground storage tank - waste oil
Scrap metal yard operations
Calbag Activities – Site 467
Extensive vehicle operations
Scrap metal yard operations
Calbag Activities – Site 512
Scrap metal yard operations
Calbag Activities – Site 563
Scrap metal yard operations
Calbag Activities – Site 572
No activities
Calbag Activities – Site 652
Oil/water separation/filtration use
Scrap metal yard operations
Calbag Activities – Site 653
Scrap metal yard operations

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