

Portland Harbor Natural Resource Damage Assessment

Phase 2: Allocation Summary Memo for Gould Electronics, Inc.

1.0 INTRODUCTION

Gould Electronics, Inc. (Gould), 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 party-specific allocation of natural resource damages liability for one site with which Gould is associated, Site 140.¹ 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, Gould's liability is calculated to be 0.07 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 Gould's site.
- ❖ Section 4 outlines Gould'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 GOULD SITE

Exhibit 2-1 is a map of the Gould 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 GOULD SITE

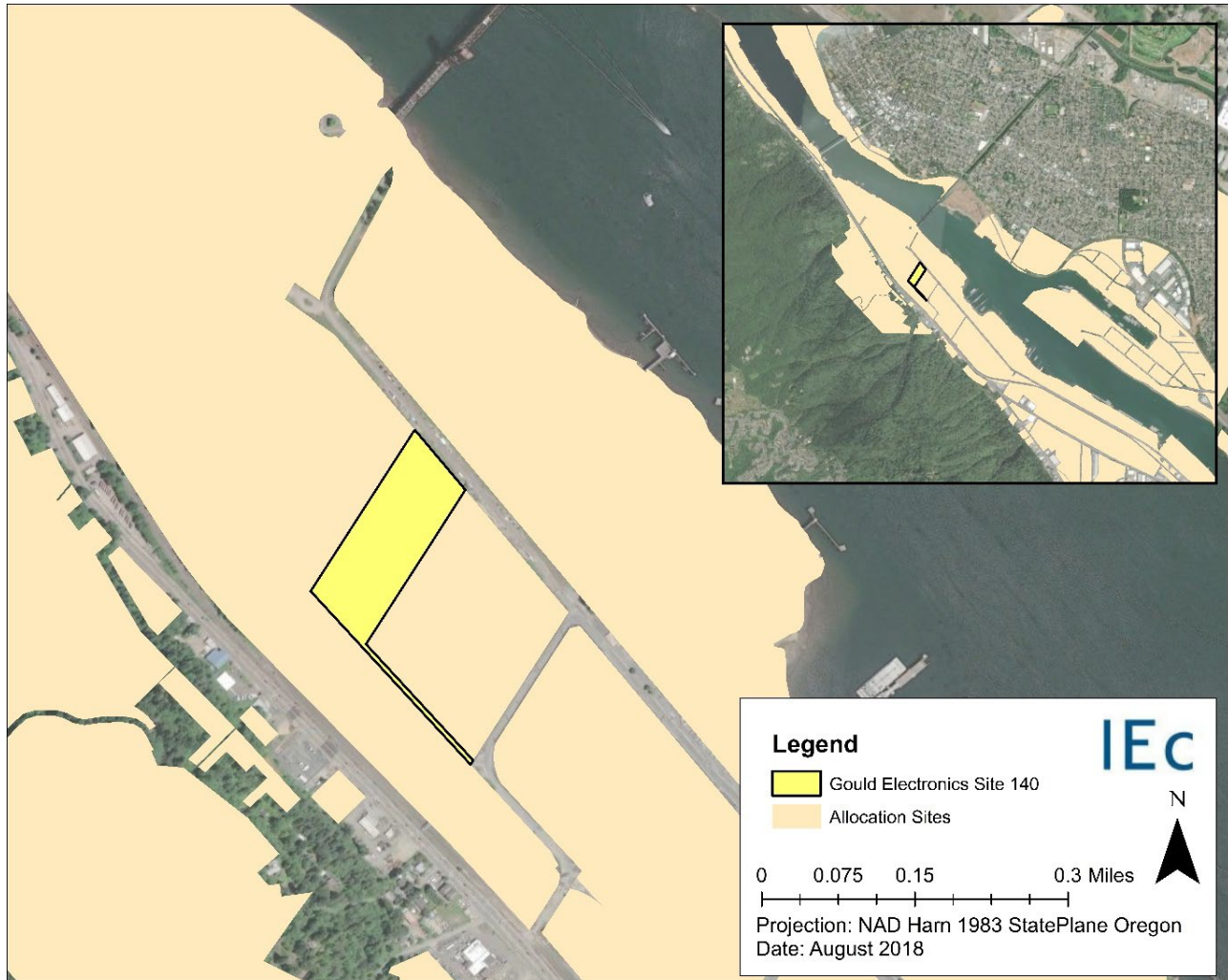


EXHIBIT 2-2 GOULD SITE BACKGROUND INFORMATION

SITE ID	ADDRESS	CURRENT OWNER	GOULD DATES OF OWNERSHIP	GOULD DATES OF OPERATION	SITE ACREAGE
140	5909 NW 61st Avenue, Portland, Oregon	Gould Electronics Inc.	1979 – Present	1979 – 1981	9.2 acres

3.0 GOULD OWNERSHIP AND OPERATIONS

The following section briefly describes Gould's ownership of and operations at Site 140.

Site 140

NL Industries operated on the property from 1949 to 1979 (Exhibit 1-1). During that 30-year time period, NL Industries operated a lead smelter and produced lead oxide at the Site, discharging approximately 6.5 million gallons of untreated battery acid to Doane Lake and burying approximately 80,000 tons of lead-bearing material on the property. Gould acquired the property in 1979 and is the current owner. From 1979 to 1981, Gould began closing operations, which included cable sweating, lead refining, battery breaking, and lead oxide production. As a result of the discharges and burial of hazardous wastes at the Site, in 1983 the U.S. EPA listed the Site on the National Priorities List. A remedial investigation was conducted, and site cleanup was completed in 2002. Currently, there are no operations.

4.0 GOULD ACTIVITIES

Exhibit 4-1 identifies, for Gould’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 GOULD-RELATED ACTIVITIES

Gould Activities - Site 140
Battery breaking
Hydraulic fluid use
Landfill of dredged sediments-Willamette prior to 1980
Landfill of shredded battery casings
Lead smelting/refining
PCB transformer use

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