

Portland Harbor Natural Resource Damage Assessment

Phase 2: Allocation Summary Memo for HAJ Inc.

1.0 INTRODUCTION

HAJ Inc. (HAJ), 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 HAJ is associated, Site 503.¹ 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, HAJ's liability is calculated to be 0.17 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 HAJ's site.
- ❖ Section 4 outlines HAJ'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 HAJ SITE

Exhibit 2-1 is a map of the HAJ site included in their site-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 HAJ SITE

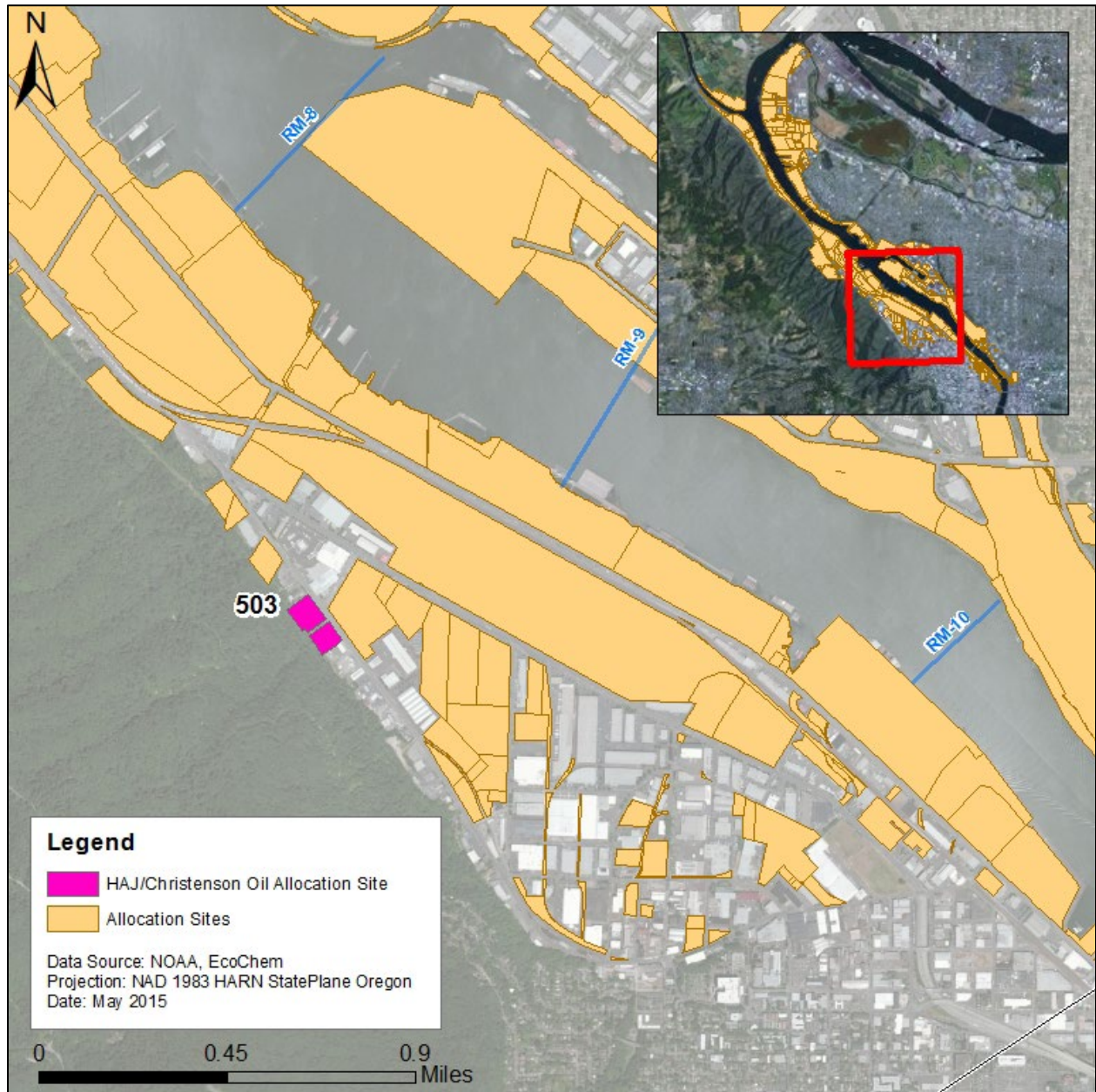


EXHIBIT 2-2 HAJ SITE BACKGROUND INFORMATION

SITE ID	ADDRESS	CURRENT OWNER	HAI YEARS OF OWNERSHIP	HAI YEARS OF OPERATION	SITE ACREAGE
503	3821 NW St Helens Rd (East Plant)	HAI, Inc	1984 – Present	Late 1940's – Present	2.97
503	3865 NW St Helens Rd (West Plant)	BCS Properties LLC	None	2000 - Present	2.08

3.0 HAI OWNERSHIP AND OPERATIONS

The following section briefly describes HAI's ownership of and operations at Site 503.

Site 503

Christenson Oil is a bulk petroleum storage and distribution facility specializing in lubricating and other specialty oils. The facility handles small quantities of cresols, isobutanol, and phenolic and zinc containing lubricant additives. Christenson Oil has occupied the property since at least 1952 and may have built petroleum storage facilities on the property as early as the 1940s. There are two outdoor aboveground storage tank (AST) farms (including 14 ASTs) and three indoor tank farms (including 32 ASTs) located in the East Plant portion of the property. Four of the tank farms are used for bulk petroleum storage with a capacity of 290,400 gallons. The fifth tank farm is used for product mixing and blending and has a capacity of 23,000 gallons. The ASTs are enclosed in secondary containment structures. The West Plant includes warehouses, offices, loading/unloading facilities, and storage areas. Three spills have been documented on this property since 1975.

4.0 HAJ ACTIVITIES

Exhibit 4-1 identifies, for HAJ'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 HAJ-RELATED ACTIVITIES

HAJ Activities - Site 503
Aboveground storage tank (AST) - Kerosene
AST lubrication oil
AST other petroleum/unknown petroleum
Extensive vehicle operations or washing facilities
Hydraulic oil leakage/spills
Petroleum leaks/spills
Unprotected storage of petroleum contaminated soil
Underground storage tank (UST) - diesel
UST other petroleum/unknown petroleum

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.