

# Portland Harbor Natural Resource Damage Assessment Phase 2: Allocation Summary Memo for Koppers, Inc.

## 1.0 INTRODUCTION

Koppers, Inc. (Koppers), an 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 Koppers is associated, Site 123.<sup>1</sup> 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, Koppers' liability is calculated to be 3.00 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 Koppers' site.
- ❖ Section 4 outlines Koppers' activities at their site.
- ❖ Section 5 is a list of references.

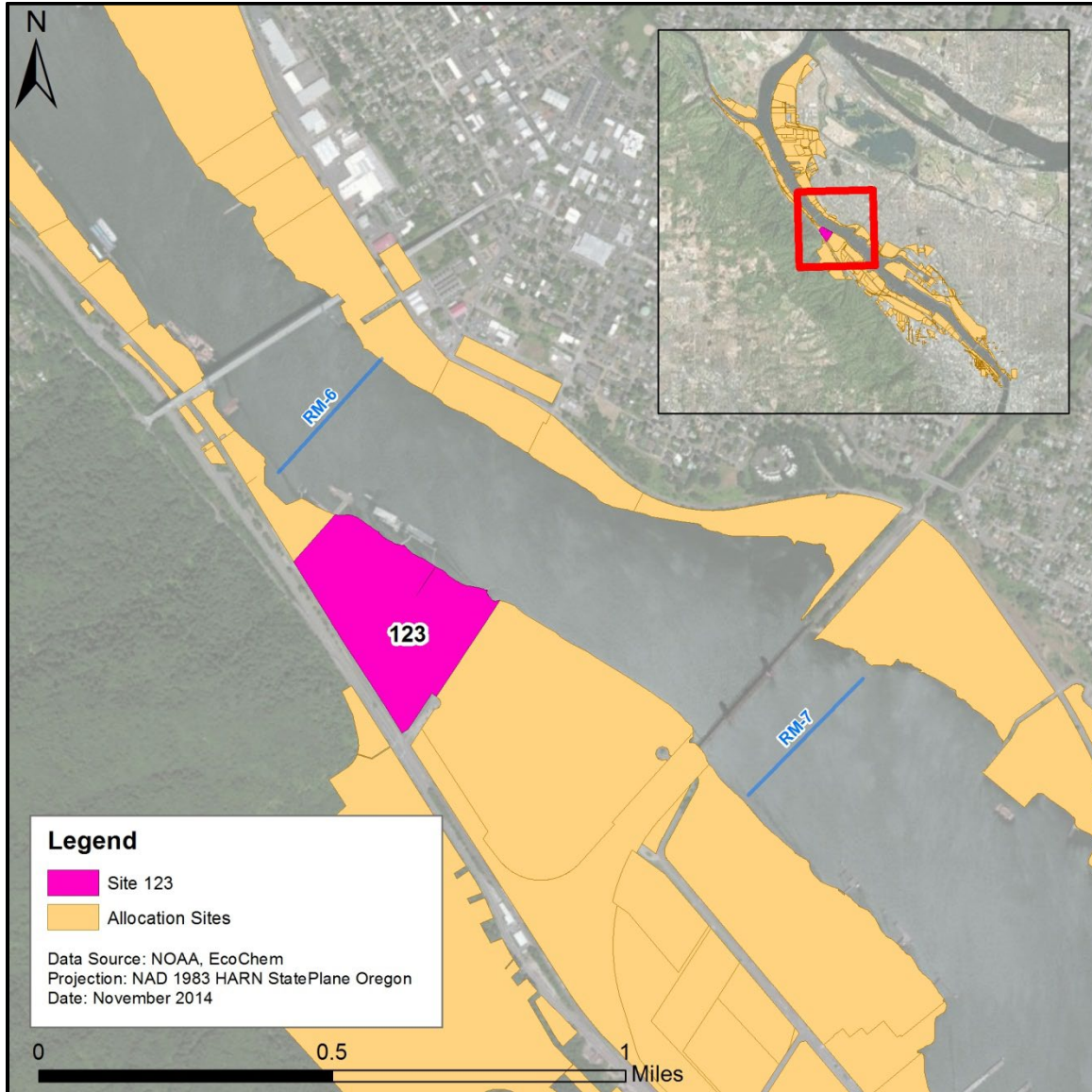
---

<sup>1</sup> 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 KOPPERS SITE

Exhibit 2-1 is a map of the Koppers 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 KOPPERS SITE



**EXHIBIT 2-2 KOPPERS SITE BACKGROUND INFORMATION**

<b>SITE ID</b>	<b>ADDRESS</b>	<b>CURRENT OWNER</b>	<b>KOPPERS DATES OF OWNERSHIP</b>	<b>KOPPERS DATES OF OPERATION</b>	<b>SITE ACREAGE</b>
123	7540 NW St Helens Rd Portland, OR	Northwest Natural (1958 - Present)	None	12/29/1988 - present	6.4 of 44.65 total site acres

### **3.0 KOPPERS OPERATIONS**

The following section briefly describes Koppers' operations at the site listed in Exhibit 2-2.

#### **SITE 123 (NW Natural)**

Koppers, Inc. has leased a 6.4 acre parcel of property from Northwest Natural since December 29, 1988. Historically, Beazer leased the substantially same parcel for coal tar distillation, storage and distribution from 1965 until 1988. In 1988, Koppers, Inc. resumed storage and distribution operations of coal tar pitch and other related products into the terminal via railroad tank cars or bulk cargo ships. Prior to 1999, only solid coal tar pitch was being stored and distributed. In 1999, liquid coal tar pitch storage and distribution began. In 2005, most of the solid pencil pitch at the site had been primarily phased out.

#### 4.0 KOPPERS ACTIVITIES

Exhibit 4-1 identifies, for Koppers' 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 KOPPERS-RELATED ACTIVITIES

<b>Koppers Activities – Site 123</b>
Aboveground storage tank - other petroleum/unknown petroleum
Coal tar pitch distribution/storage
Petroleum leaks/spills
Ship berthing
Extensive vehicle operations or washing facilities

## 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.