Portland Harbor Natural Resource Damage Assessment Phase 2: Allocation Summary Memo for McCall Oil and Chemical

1.0 INTRODUCTION

McCall Oil and Chemical (McCall), 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 McCall is associated, Site 136. 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, McCall's liability is calculated to be 1.56 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 McCall's site.
- Section 4 outlines McCall'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 MCCALL SITE

Exhibit 2-1 is a map of the McCall site included in their site-specific allocation, and Exhibit 2-2 outlines background information on 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 MCCALL SITE

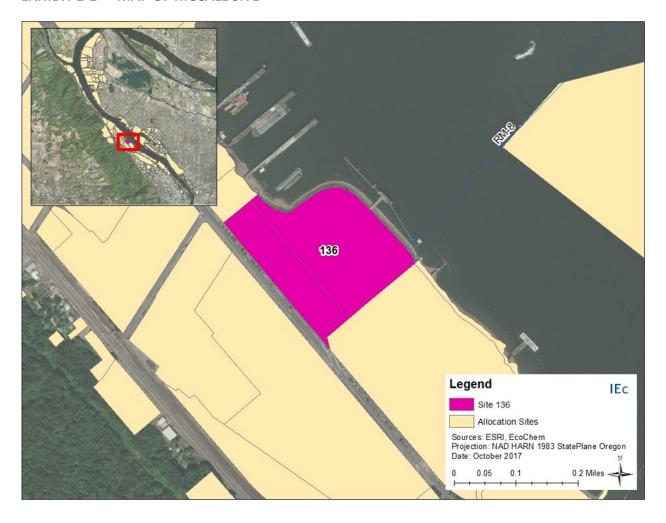


EXHIBIT 2-2 MCCALL SITE BACKGROUND INFORMATION

SITE ID	ADDRESS	CURRENT OWNER	MCCALL DATES OF OWNERSHIP	MCCALL DATES OF OPERATION	SITE ACREAGE
136	5550 NW Front Ave	Tanker Basin LLC	None	1975 – Present	18.02
136	5550 NW Front Ave	Morec Front LLC	1982 – 1982 and 1992 – 2003	1982 – Present	1.22
136	5550 NW Front Ave	GWC Front LLC	1982 – 2001	None	7.33
136	5550 NW Front Ave	GWC Front LLC	None	1982 – Present	0.060

3.0 MCCALL OWNERSHIP AND OPERATIONS

The following section briefly describes McCall's ownership of and operations at Site 136.

Site 136

The Port of Portland created a large portion of the tax parcels at Site 136 in the mid-1960s using dredge material from the Willamette River. The property is divided into three sections, including the marine terminal, asphalt facility, and former Great Western Chemical Company (GWCC) facility. McCall has operated a marine terminal on the property since 1975. The terminal stores, blends, and distributes petroleum products including asphalt, bunker fuel, marine diesel oil, and diesel fuel.

In addition, several operators have conducted activities at the asphalt facility. The Flintkote Company operated a plant from 1946 to 1962 and manufactured roofing material using felt, asphalt, asbestos, rock dust, and sand granules. Douglas Oil operated the asphalt facility from 1960 to 1982. McCall has operated at the asphalt facility since 1982, using it for storage and distribution of asphalt products.

The former GWCC facility consists of a parking lot, warehouse, storage tanks and sheds, testing laboratory, and maintenance building. The Flintkote Company manufactured roofing material at the plant from the mid-1940s to 1982. McCall Oil Corporation owned the property from 1982 to 2001. Since 2001, it has been owned by subsidiaries of McCall Oil, GWC Properties, LLC, and GWC Front, LLC. Great Western Chemical Company/Chemax began operations in 1984, which included storage and distribution of industrial chemicals. Quadra Chemical Corporation has operated the facility since 2001.

4.0 MCCALL ACTIVITIES

Exhibit 4-1 identifies, for McCall'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 MCCALL-RELATED ACTIVITIES

McCall Activities - Site 136			
Asphalt batch plant/asphalt production			
Creosote treated wood pilings			
Extensive vehicle operations or washing facilities			
Fuel oil use			
Fueling operations			
Landfill of dredged sediments-Willamette prior to 1980			
Lubricating oil used in manufacturing			
Oil/water separation/filtration use			
Petroleum leaks/spills			
Above ground and Underground Storage Tanks			

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