

Portland Harbor Natural Resource Damage Assessment

Phase 2: Allocation Summary Memo for Portland Terminal Railroad Company

1.0 INTRODUCTION

Portland Terminal Railroad Company (PTRR), 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 site-specific allocation of natural resource damages liability for 13 sites with which Portland Terminal Railroad Company is associated: 197, 306A, 306B, 306C, 306D, 311C, 311G, 316D, 334A, 336D, 337, 348B, and 465A.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, Portland Terminal Railroad Company's liability is calculated to be 1.87 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 PTRR's sites.
- ❖ Section 4 outlines PTRR'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 PTRR SITES

Exhibit 2-1 is a map of the PTRR sites included in their site-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 PTRR SITES

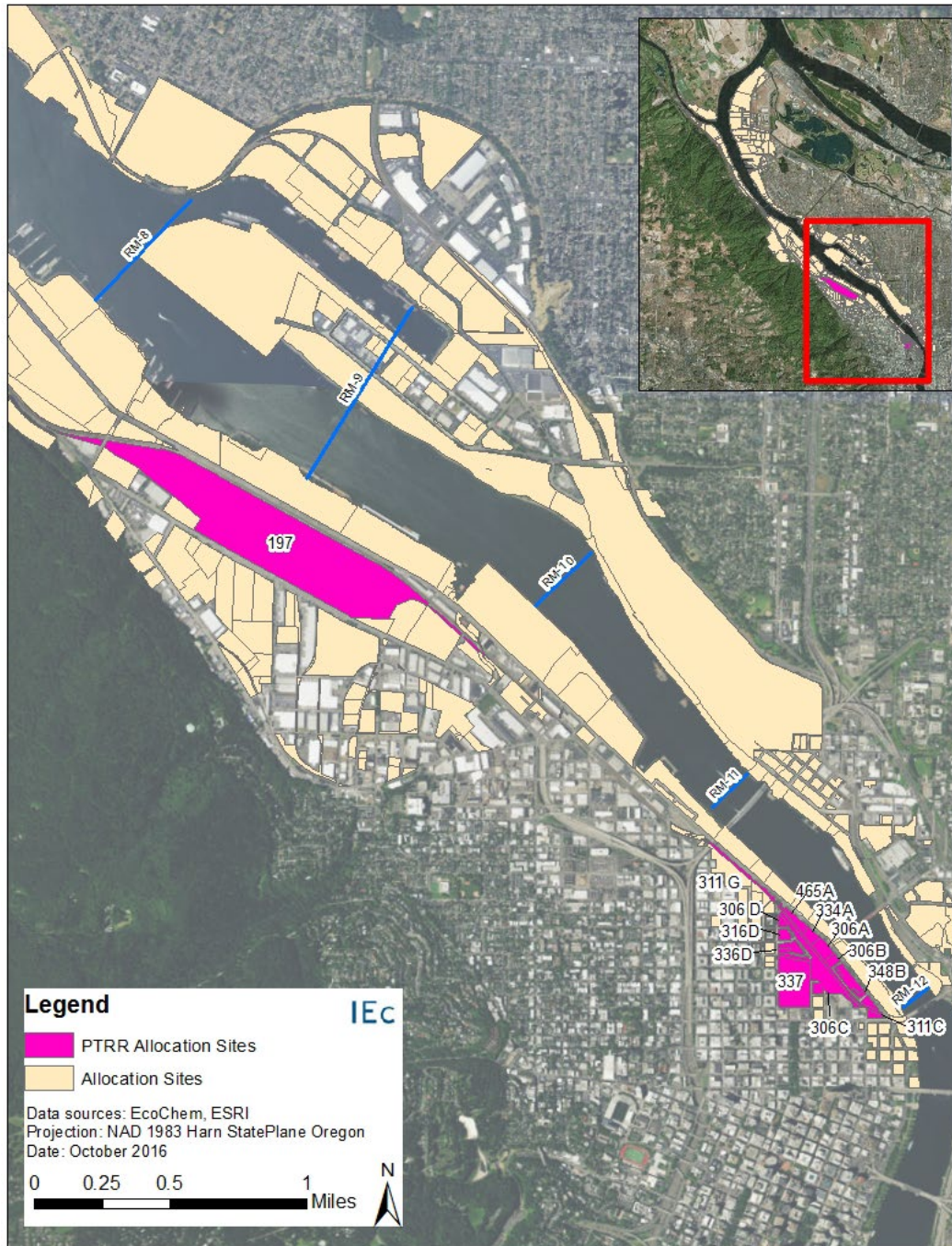


EXHIBIT 2-2 PTRR SITE BACKGROUND INFORMATION

SITE ID	ADDRESS¹	CURRENT OWNER	PTRR DATES OF OWNERSHIP	PTRR DATES OF OPERATIONS	SITE ACREAGE
197	3500 NW Yeon Ave.	PTRR	1922 – Present	1922 – Present	146
306A	1207 NW Naito Pkwy.	City of Portland	1890s – 1987	1890s – 1987	1.97
306B	901 NW Naito Pkwy.	City of Portland	1890s – 1987	1890s – 1987	4.69
306C	800 NW 6TH Ave.	City of Portland	1890s – 1987	1890s – 1987	9.91
306D	1020 – 1300 NW 9TH Ave.	City of Portland	1890s – 1987	1890s – 1987	3.44
311C	Union Station Track 5	PTRR	1890s – Present	1890s – Present	3.63
311G	Union Station Track 5	PTRR	1882 – Present	1882 – Present	2.09
316D	1020 – 1300 NW 9TH Ave.	Hoyt Street Properties LLC	1890s – 1987	1890s – 1987	1.06
334A	1207 NW Naito Pkwy.	Madrona Park LLC	1890s – 1987	1890s – 1987	1.31
336D	1020 – 1300 NW 9TH Ave.	SP Tower Limited Partnership	1890s – 1987	1890s – 1987	0.50
337	715 NW Hoyt St.	United States Postal Service	1882 – 1959 1882 – 1974	1882 – 1959 1882 – 1974	13.39
348B	901 NW Naito Pkwy.	GSL Yard Phase S	1890s – 1987	1890s – 1987	0.81
465A	1207 NW Naito Pkwy.	State of Oregon	1890s – 1987	1890s – 1987	1.52

Note.

1. All addresses are located in Portland, Oregon.

3.0 PTRR OWNERSHIP AND OPERATIONS

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

SITE 197 (Guilds Lake Yard)

Site 197, or Guilds Lake Yard, has been owned by PTRR since approximately 1922. Current and historical operations at Guilds Lake Yard include railcar switching, minor locomotive servicing, fueling, loading, and storage of empty railway cars. PTRR owns an undivided 75% interest in the Guilds Lake Yard. The property is 1,000 feet from the Willamette River.

SITES 306A, 306B, 306C, 306D, 311C, 311G, 316D, 334A, 336D, 337, 348B, and 465A (Union Station Properties)

In the 1890s, PTRR began operating the passenger train depot at Union Station. Operations included passenger railcar switching, locomotive servicing, and fueling. Structures included the train depot, passenger train rail yard, and fueling station. Most of the tax parcels were sold to the Portland Development Commission in 1987 for the development of residential properties. The two tax parcels comprising Site 337 were sold to the United States Postal Service in 1959 and 1974, respectively. The Track 5 properties (Sites 311C and 311G) are currently owned by Portland Terminal Railroad Company. Amtrak currently operates the Union Station Depot. The properties are between 250 and 1,000 feet from the Willamette River.

4.0 PTRR ACTIVITIES

Exhibit 4-1 identifies, for each of PTRR’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 PTRR-RELATED ACTIVITIES

PTRR Activities - Site 197
Extensive vehicle operations-railyard
Burning waste/debris
Fueling operations
Creosote treated railroad ties
Unprotected storage of petroleum contaminated soil
Hydraulic oil use/leakage/spills
Unprotected storage of spent sandblasting grit
Unprotected storage of paint waste
Above-ground storage tank (AST) diesel
AST other petroleum/unknown petroleum
Underground storage tank (UST) bunker c
UST kerosene
UST lubrication oil
PTRR Activities - Site 306A
Extensive vehicle operations-railyard
Creosote treated railroad ties
PTRR Activities - Site 306B
Extensive vehicle operations-railyard
Creosote treated railroad ties
Petroleum leaks/spills
PTRR Activities - Site 306C
Extensive vehicle operations-railyard
Fueling operations
Creosote treated railroad ties
Petroleum leaks/spills
AST heating oil

PTRR Activities - Site 306C (continued)
UST bunker c
UST unknown petroleum
PTRR Activities - Site 306D
Extensive vehicle operations-railyard
Fueling operations
Creosote treated railroad ties
Disposal of liquid manufactured gas plant waste
UST diesel
UST other/unknown petroleum
PTRR Activities - Site 311C
Extensive vehicle operations-railyard
Fueling operations
Creosote treated railroad ties
Petroleum leaks/spills
PTRR Activities - Site 311G
Creosote treated railroad ties
PTRR Activities - Site 316D
Extensive vehicle operations-railyard
Creosote treated railroad ties
PTRR Activities - Site 334A
Extensive vehicle operations-railyard
Creosote treated railroad ties
PTRR Activities - Site 336D
Extensive vehicle operations-railyard
Creosote treated railroad ties
Disposal of liquid manufactured gas plant waste
PTRR Activities - Site 337
Extensive vehicle operations-railyard
Fueling operations
Creosote treated railroad ties
Coal gasification plant/refinery operations
Steel fabrication
AST other petroleum/unknown petroleum

PTRR Activities - Site 337 (continued)
UST diesel
UST gasoline
UST heating oil
UST waste oil
PTRR Activities - Site 348B
Extensive vehicle operations-railyard
Creosote treated railroad ties
PTRR Activities - Site 465A
Extensive vehicle operations-railyard
Creosote treated railroad ties

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