

Portland Harbor Natural Resource Damage Assessment

Phase 2: Allocation Summary Memo for PacifiCorp

1.0 INTRODUCTION

PacifiCorp, both an owner and operator of sites in and upstream of Portland Harbor as well as an energy distribution network that includes a portion of the assessment area, 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 7 property sites with which PacifiCorp is associated, including Sites 279A, 284, 288, 290, 291, 606, and 640; as well as 21 distribution network sites, including Sites 76L, 295, 392, 402, 403, 405, 408, 414, 416, 418, 420, 436, 587, 613, 641, 642, 643, 644, 645, 646, and 647.¹ 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, PacifiCorp's liability is calculated to be 13.59 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 PacifiCorp's sites.
- ❖ Section 4 outlines PacifiCorp'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 PACIFICORP SITES

Exhibit 2-1 is a map of the PacifiCorp sites included in their party-specific allocation, and Exhibit 2-2 is a map of PacifiCorp's upstream locations. Exhibits 2-3 and 2-4 outline 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 PACIFICORP SITES

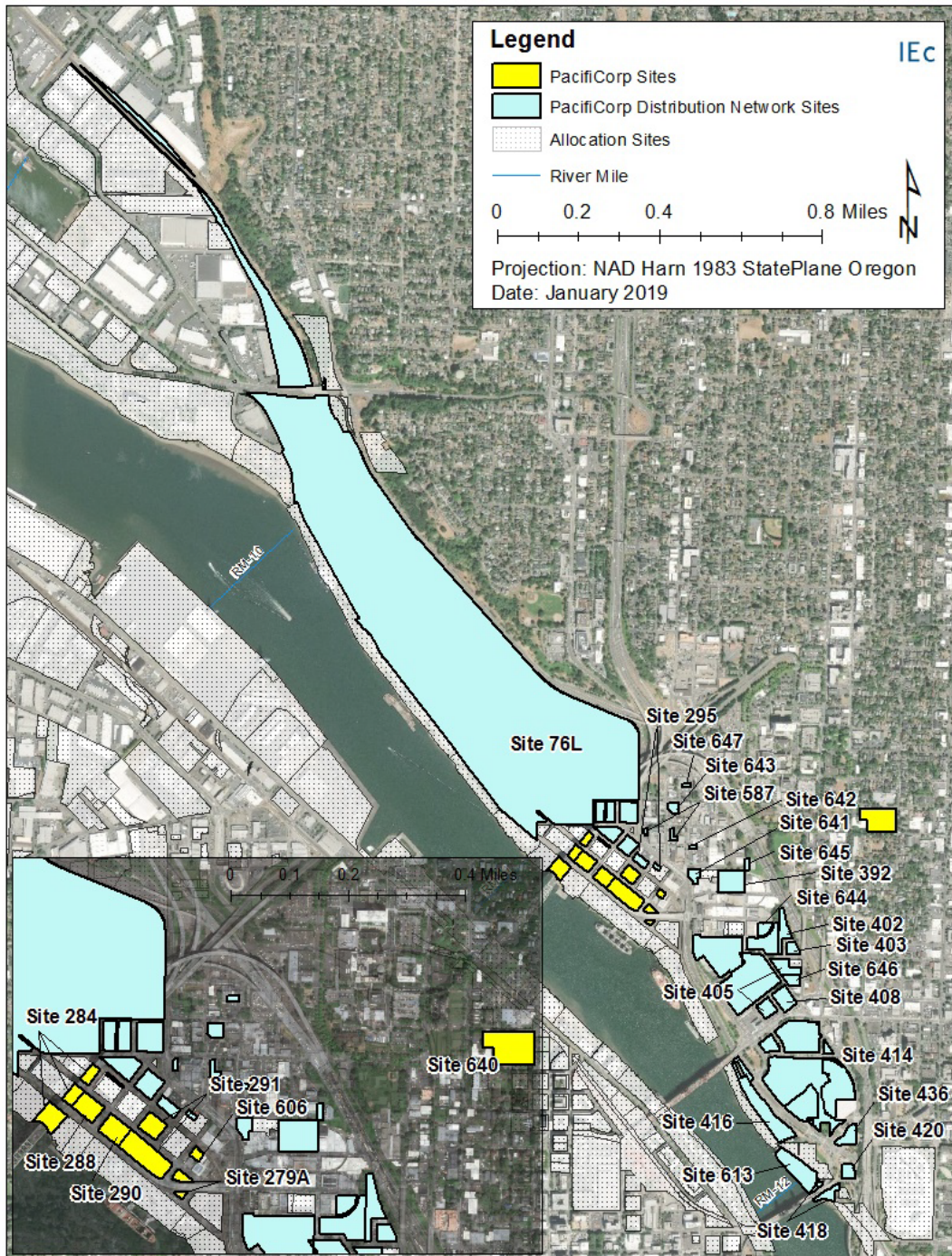


EXHIBIT 2-2 MAP OF PACIFICORP PROPERTY SITES UPSTREAM OF THE ATASSESSMENT AREA

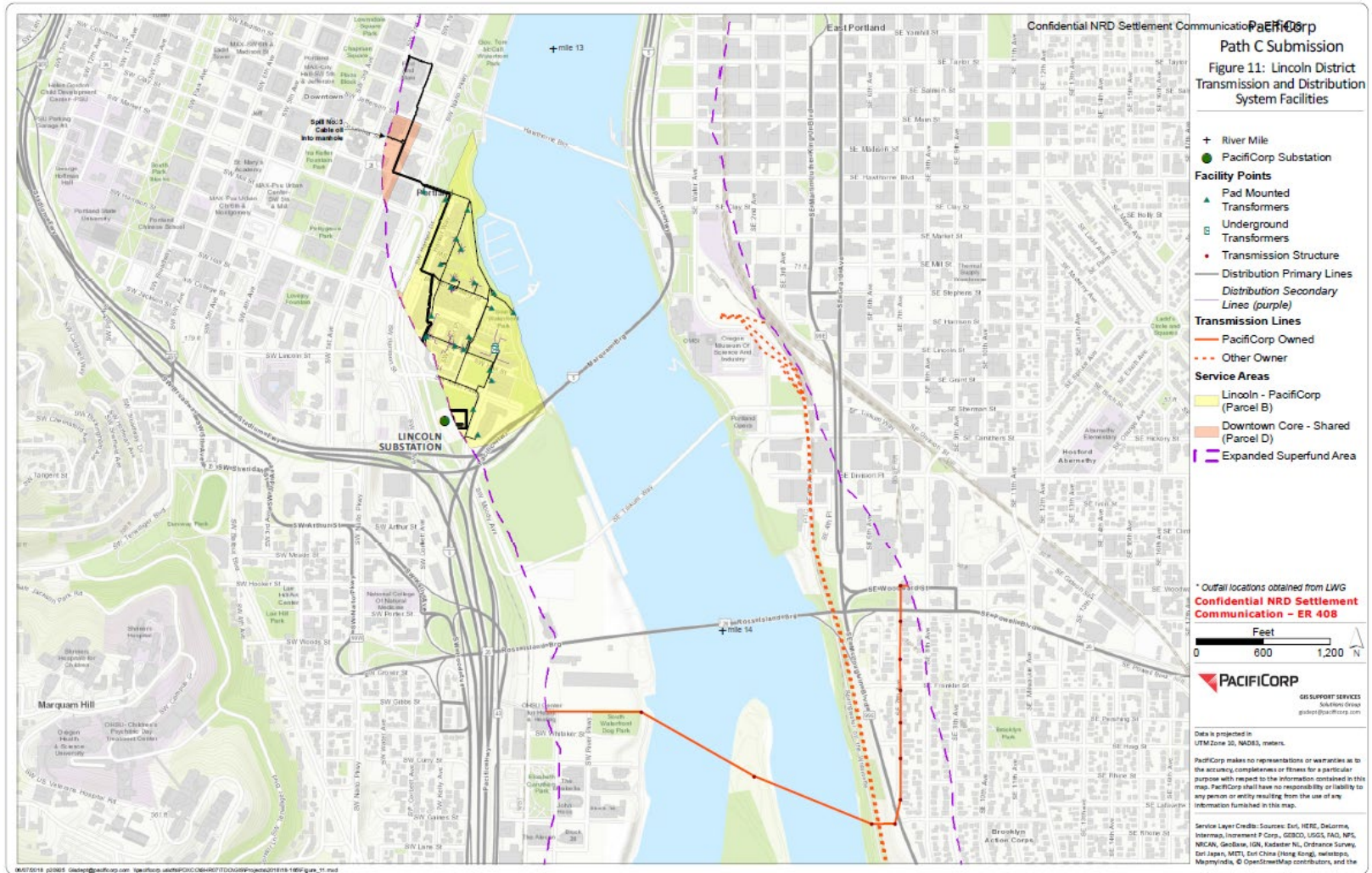


EXHIBIT 2-3 PACIFICORP PROPERTY SITE BACKGROUND INFORMATION

SITE ID	ADDRESS¹	CURRENT OWNER	PACIFICORP DATES OF OWNERSHIP	PACIFICORP DATES OF OPERATION	SITE ACREAGE
279A	2110 N Lewis Ave	City of Portland	1913 – 1991	1913 – 1991	1.2
284	N River St & Loring St	Oregon Department of Transportation (ODOT)	1953 – 1966	1953 – 1966	1.89
288	2223 N Randolph Ave	Downtown Recycling LLC	1953 – 2002	1953 – 1991	0.97
290	2204 N Randolph Ave	Petrina Properties V LLC	1948 – 1992	1948 – 1992	1.0
291	1009 N River St	PacifiCorp	1948 – Present	1948 – Present	2.85
291	1009 N River St	PacifiCorp	1930 – Present	1948 – Present	2.85
291	1050 N Loring St	PacifiCorp	1915 – Present	1915 – Present	2.85
606	2170 – 2182 N Lewis Ave	HOB LLC	None	1930 – 1981	0.2
640	40-98 NE Knott St	PacifiCorp	PGE (1906 – 1973) PacifiCorp (1973 – Present)	PGE (1906 – 1973) PacifiCorp (1973 – Present)	2.74

Note.

1. All addresses are located in Portland, Oregon.

EXHIBIT 2-4 PACIFICORP DISTRIBUTION NETWORK SITE BACKGROUND INFORMATION

SITE ID	ADDRESS¹	CURRENT OWNER	PACIFICORP DATES OF OPERATION	SITE ACREAGE
76L	1135 N Knott St	Union Pacific Railroad Company	1953 – Present	215.8
295	2317 N Clark Ave	Bradrick Company Inc	1976 – Present	0.56
392	625 N Thompson St	North Coast Electric	1964 – Present	2.25
402	1921 N Gantenbein Ave	Public Storage	1972 – Present	1.25
403	265 Hancock St	265 Hancock LLC	1976 – Present	0.53
405	501 N Dixon St	School District No 1	1933 – Present	10.12
408	265 N Broadway	AOR Real Estate Inc	1962 – Present	1.29
414	664 N Tillamook St	City of Portland (Portland Water Bureau)	1975 – Present	25.6
416	1225 N Thunderbird Way	Aegean Corp	1975 – Present	4.1
418	Beneath Ramps to Steel Bridge	Southern Pacific E	1976 – Present	1.0
420	7 NE Oregon St	Kalberer Company	1973 – Present	0.68
436	51 NE Holladay St	Tri-County Metropolitan	1968 – Present	1.1
587	2519 N Mississippi Ave	Widmer Brothers Brewing Co	1962 – Present	0.32
613	220 NE Pacific St	Louis Dreyfus Corporation	1961 – Present	2.35
641	2240 N Interstate Ave	North Interstate LLC	1975 – Present	0.35
642	2429 WI/ N Borthwick Ave	Conger Northwest Inc	1975 – Present	Unknown
643	2630 N Mississippi Ave	Frederick L Streimer 2012 Irrev TR	1969 – Present	Unknown

SITE ID	ADDRESS ¹	CURRENT OWNER	PACIFICORP DATES OF OPERATION	SITE ACREAGE
644	434 N Tillamook St	Hanbak Properties LLC	1957 – Present	0.56
645	NE Corner of Page & N Kerby Ave	City of Portland	1966 – Present	Unknown
646	253 WI/ N Broadway	Paramount Parking LLC	1973 – Present	0.67
647	810 N Graham St	S & E Properties LLC	1956 – Present	Unknown

Note.

1. All addresses are located in Portland, Oregon.

3.0 PACIFICORP OWNERSHIP AND OPERATIONS

PacifiCorp and its corporate predecessors, Pacific Power & Light and Northwestern Electric, were allocated as one entity during the Phase 2 process. The following section briefly describes PacifiCorp’s ownership and operations at the sites listed in Exhibits 2-3 and 2-4.

Albina Substation

Site 279A: This block is located at river mile 11.4 east, 307 feet from the river. The property is currently owned by the City of Portland and consists of a paved parking lot and an on-ramp to the highway. PacifiCorp’s corporate predecessors acquired a portion of the site in 1913. An electrical substation was constructed in 1913 and operated until 1950. In 1925, PacifiCorp acquired an additional tax parcel and created the Albina Service Center. The Service Center included a switching yard and a two-story building which housed a store, meter service, equipment storage, and offices. PacifiCorp moved the substation to another property between 1948 and 1950. In 1991, PacifiCorp sold this site to Thomas Tucker, who used it for storage and an artist studio until it was sold to the City of Portland in 2001.

Site 284: This block is located at river mile 11.1 east, 313 feet from the river. The block was part of the Albina Engine and Machine Works shipbuilding yard prior to PacifiCorp ownership. PacifiCorp owned the block from 1953 to 1966 and used it for vehicle and equipment storage. Oregon Department of Transportation has owned this site since 1966 and leases to NW Copper Works, a custom fabrication shop for steel and titanium alloy vessels and pipes.

Site 288: This block is located at river mile 11.1 east, 370 feet from the river. The block was part of the Albina Engine and Machine Works shipbuilding yard prior to PacifiCorp ownership. PacifiCorp owned the site from 1953 to 2000. From 1953 to 1991, the site was used for electrical equipment and pole storage. Currently, the block is owned by Downtown Recycling LLC, whose operations include the collection of waste cooking oil for recycling. The property has a one-story office and shop building and an unpaved parking lot.

SITE 290: This block is located at river mile 11.2 east, 312 feet from the river. The block was part of the Albina Engine and Machine Works shipbuilding yard prior to PacifiCorp ownership. PacifiCorp owned the site from 1948 to 1992 and used it for equipment and vehicle storage. After 1992, the property changed

hands to Altco Building LLC and then Petrina Properties V LLC, who purchased the property in 2014. General Automotive Supply has leased the on-site warehouse since 1992.

SITE 291 (Current Albina Substation): The site is located at river mile 11.3 east, 337 feet from the river. From the early 1900s to 1948, this site was part of the Albina Engine & Machine Works and was used for log storage and contained a plate shop and a fabrication slab. PacifiCorp's corporate predecessors began development of the Albina area by acquiring a portion (Block 70) of this site in 1915. PacifiCorp purchased another portion (Block 82) in 1930, and the remaining portion (Block 81) in 1948. PacifiCorp developed the Albina substation in 1948, and it continues operations to the present. Equipment includes transformers, oil-circuit breakers, and other dielectric fluid-filled electrical equipment.

SITE 606: The site is located at river mile 11.3 east, 670 feet from the river. PacifiCorp's corporate predecessors operated a vehicle and truck maintenance garage on the site from 1930 to 1981. Prior to 1930, the site was used for storage and a feed mill (unknown ownership). There have been several owners recorded since 1930, including Carroll R Day (1930 – 1992), Roger Ostrom & Linda Showman (1981 – 2007), CC & G LLC (2007 – 2014), Gary & Julie Tinker (2014 – 2017), and Worchester Building LLC (2015 – 2017). Details of the historical concurrent ownership between Carroll R Day and Roger Ostrom & Linda Showman between 1981 and 1992 are not available. Operations unrelated to PacifiCorp have included piano restoration, architectural graphics and signage manufacturing, and wholesale of products such as tea, coffee, and essential oils. HOB LLC has owned the property since 2017.

Knott Substation

SITE 640: The site is located at river mile 11.5 east, 3,300 feet from the river. Portland General Electric (PGE) owned and operated the substation prior to PacifiCorp (1906 – 1973), who has owned the property since 1973 and operates an unmanned transmission and distribution substation. Under the 1972 agreement between PacifiCorp and PGE, PacifiCorp assumed liability for PGE at this site beginning in 1973 (REF 8517).

Distribution Network Sites 76L, 295, 392, 402, 403, 405, 408, 414, 416, 418, 420, 436, 587, 613, 641, 642, 643, 644, 645, 646, and 647: PacifiCorp's Albina Distribution Network encompasses a 240-acre section of the assessment area, including both riverfront and upland properties spanning river miles 11.1 through 12.3. The Distribution Network includes the poles, power lines, vaults, underground cables, submerged cables, and transformers that together distribute power to PacifiCorp customers. The various portions of the Distribution Network were acquired, constructed, or installed by PacifiCorp at various times, including actions taken by PacifiCorp or its predecessor companies (Northwestern Electric and Pacific Power & Light) as well as acquisition from PGE in 1972.

The properties listed as being associated with the Distribution Network have not been identified as being owned or leased by PacifiCorp. Rather, these properties have been identified as having PacifiCorp-owned equipment or related activities with the potential to cause contaminant releases to the assessment area. Operations related to the Distribution Network include installation, maintenance, and replacement or removal of poles, lines, vaults, underground cables, and transformers; spill response; and periodic removal of water accumulated in vaults, as needed.

Lincoln Substation, Distribution Network, and Former Steam Plant

The current Lincoln substation is located approximately 1.2 miles upstream of the assessment area. PacifiCorp has operated the substation under an easement from the Portland Development Commission since 1988. The Substation is an unmanned electrical substation where incoming 115 kilovolt (kV) transmission lines are stepped down to 12.5 kV for distribution to residential, commercial, and other customers in the area. PacifiCorp's Lincoln Distribution Network encompasses a 38-acre section outside of the assessment area spanning river miles 13 through 13.4.

PacifiCorp owned and operated the former Lincoln Steam Plant, which provided both electricity for the Portland metro area and steam for building heating to the Portland downtown area from 1917 to 1990. Electricity production ceased in the early 1970s. Steam heat production was eventually discontinued in 1985 and the plant was closed.

4.0 PACIFICORP ACTIVITIES

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

PacifiCorp Activities - Site 279A
Petroleum leaks/spills
PCB transformer use/spills/storage
Mechanical/electrical motor repair and/or maintenance
Storage of lead batteries
underground storage tank (UST) gasoline
UST kerosene
PacifiCorp Activities - Site 284
PCB transformer use/spills/storage
PacifiCorp Activities - Site 288
above-ground storage tank (AST) waste oil
PCB transformer use/spills/storage
Creosote treated utility poles
PacifiCorp Activities - Site 290
PCB transformer use/spills/storage
PacifiCorp Activities - Site 291
PCB transformer use/spills/storage
Storage or transporting of PCB contaminated materials
Fueling operations
UST gasoline
UST diesel

PacifiCorp Activities - Site 606
Mechanical/electrical motor repair and/or maintenance
PacifiCorp Activities - Site 640
PCB transformer use/spills/storage
Storage or transporting of PCB contaminated materials
Oil/water separation/filtration use
Mercury spill
Distribution Network Sites (21 Sites)
PCB transformer use/spills/storage

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