

Portland Harbor Natural Resource Damage Assessment

Phase 2: Allocation Summary Memo for Siltronic Corporation

1.0 INTRODUCTION

Siltronic Corporation (Siltronic), 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 party-specific allocation of natural resource damages liability for one site with which Siltronic is associated, Site 125.¹ 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, Siltronic's liability is calculated to be 7.46 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 Siltronic's site.
- ❖ Section 4 outlines Siltronic'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 SILTRONIC SITE

Exhibit 2-1 is a map of the Siltronic site included in their party-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 SILTRONIC SITE

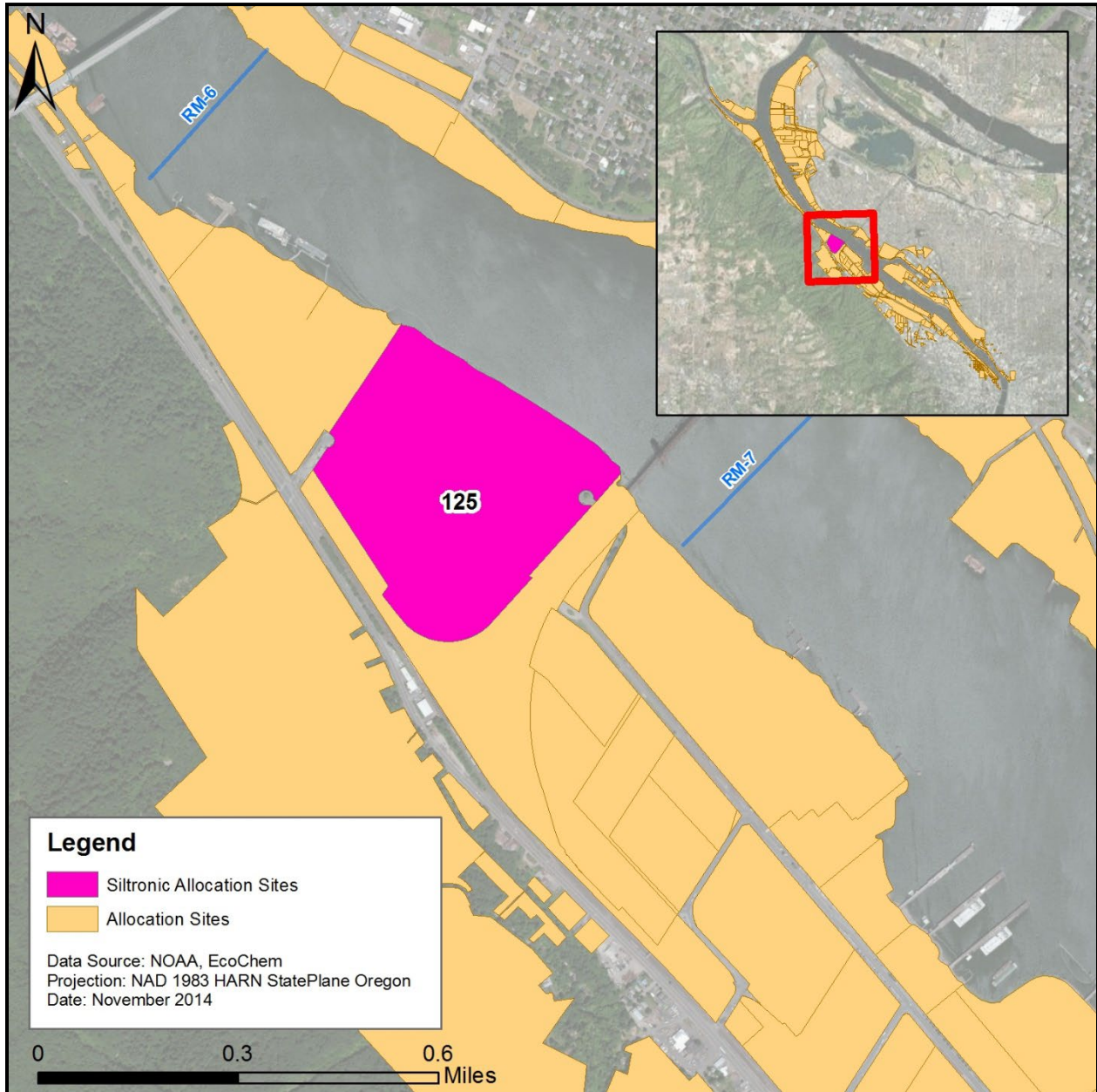


EXHIBIT 2-2 SILTRONIC SITE BACKGROUND INFORMATION

SITE ID	ADDRESS	CURRENT OWNER	SILTRONIC DATES OF OWNERSHIP	SITE ACREAGE
125	7500 NW Front Ave Portland, Oregon	Siltronic Corporation	1980 - Present	85

3.0 SILTRONIC OWNERSHIP AND OPERATIONS

The following section briefly describes Siltronic’s ownership of and operations at Site 125.

Site 125

Site 125 is adjacent to the southwest bank of the Willamette River between river miles 6 and 7. Siltronic purchased the property on August 17, 1978 and began manufacture of hyper-pure silicon wafers in March 1980. The wafer fabrication process is currently operational in two fabrication buildings. In addition to the fabrication facilities, there are 25 buildings, including a central utilities structure, two waste water treatment plants, an ultra-pure water facility, two bulk acid storage facilities, a chemical storage area, a nitrogen oxides scrubber, an electrical substation, a loading dock, a warehouse, and an administration building. There are four private outfalls and one shared City of Portland Outfall (OF-22C) located on Site #130 that discharge directly to the Willamette River.

4.0 SILTRONIC ACTIVITIES

Exhibit 4-1 identifies, for Siltronic’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 SILTRONIC-RELATED ACTIVITIES

Siltronic Activities - Site 125
above-ground storage tank (AST) diesel
AST other petroleum
AST waste oil
hazardous waste report-site #125
landfill of dredged sediments-Willamette prior to 1980
oil/water separation/filtration use
PCB containing capacitor use
PCB transformer use/spills/storage
petroleum leaks/spills

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