

Portland Harbor Natural Resource Damage Assessment

Phase 2: Allocation Summary Memo for Sulzer Pumps

1.0 INTRODUCTION

Sulzer Pumps, 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 three sites with which Sulzer Pumps is associated: 220, 221, and 576.¹ 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, Sulzer Pump's liability is calculated to be 5.46 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 Sulzer Pumps' sites.
- ❖ Section 4 outlines Sulzer Pumps' 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 SULZER PUMPS SITES

Exhibit 2-1 is a map of the Sulzer Pump 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 SULZER PUMP SITES

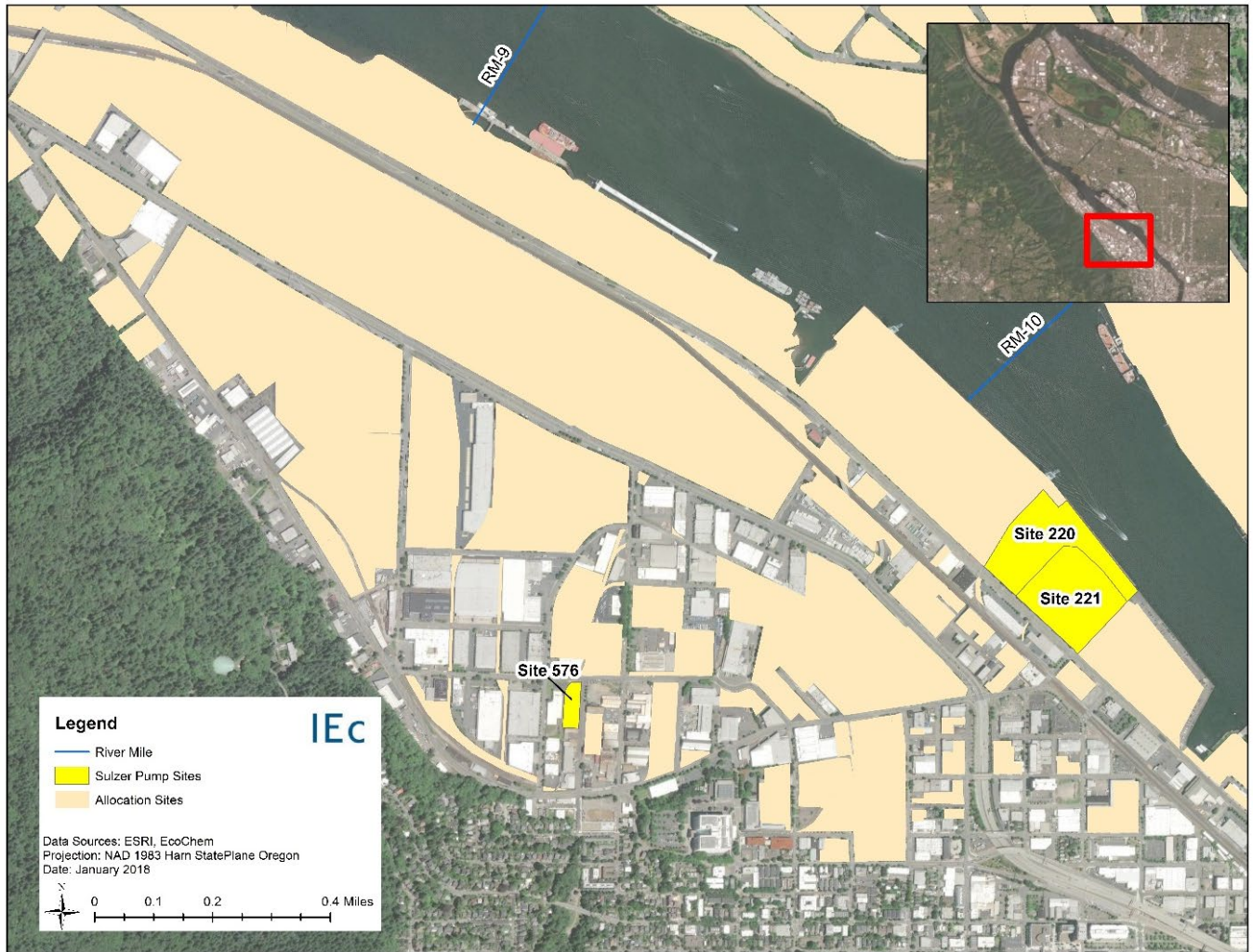


EXHIBIT 2-2 SULZER PUMPS SITE BACKGROUND INFORMATION

SITE ID	ADDRESS	CURRENT OWNER	SULZER PUMPS DATES OF OWNERSHIP	SULZER PUMPS DATES OF OPERATION	SITE ACREAGE
220	2800 NW Front Ave, Portland, OR	Sulzer Pumps	1986 – Present	1986 – Present	11.9
221	2700 NW Front Ave, Portland, OR	Dolan and Company LLC	1986 – 2005	1986 – 2005	11.8
576	2551 NW 30 th Ave, Portland, OR	Track Seven Condominium Owners Association	2004 – 2006	2004 – 2006	1.3

3.0 SULZER PUMPS OWNERSHIP AND OPERATIONS

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

SITES 220 & 221

Willamette Iron and Steel Company (WISCO) owned Sites 220 and 221 from 1904 to 1946 and operated a plant that manufactured machinery for industries related to logging, construction, sawmill, mining, pulp & paper, cement, food processing, transportation, hydroelectric, and agriculture. WISCO also performed shipbuilding on the property. Guy F. Atkinson purchased the property in 1946 and operated a pump manufacturing plant that manufactured parts for dams such as spillway gates, valves, and hoists. Shipbuilding activities continued until 1981. Sulzer Pumps purchased the property in 1986 and continued the pump manufacturing operations. In 2005, Sulzer Pumps conveyed Site 221 to Dolan and Company, LLC, which currently uses the property for warehousing and shipping/trucking activities.

SITE 576

A large warehouse covers most of Site 576. Pacific Plumbing Company owned the property from 1956 to 1986 and performed pump assembly, rental, and servicing. PACO Pumps purchased the property in 1986 and continued similar operations. Sulzer Pumps purchased PACO Pumps in 2004 and became the property owner from 2004 to 2006. They operated the same pump manufacturing and refurbishing facility. In 2006, Kaiser Group, Inc. purchased and redeveloped the property into a seven-unit industrial complex. Track Seven Condominium Owners Association has owned the property since 2007.

4.0 SULZER PUMPS ACTIVITES

Exhibit 4-1 identifies, for each of Sulzer Pumps’ 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 SULZER PUMPS-RELATED ACTIVITES

Sulzer Pump Activities - Site 220
Aboveground Storage Tank (AST) - diesel
AST other petroleum/unknown petroleum
AST waste oil
Creosote treated railroad ties
Creosote treated wood pilings
Extensive vehicle operations or washing facilities
Landfill of dredged sediments-Willamette prior to 1980
Locomotive maintenance/manufacturing
Painting boats or marine vessel
PCB transformer use/spills/storage
Pump manufacturing/refurbishing
Ship berthing
Ship/boat maintenance and/or construction
Slag storage or landfilling
Steel fabrication
Unprotected storage of spent sandblast grit
Underground Storage Tank (UST) - diesel
UST gasoline
UST hydraulic fluid
UST leaded gasoline
UST other petroleum/unknown petroleum
UST waste oil
Sulzer Pump Activities - Site 221
Creosote treated railroad ties
Extensive vehicle operations or washing facilities
Landfill of dredged sediments-Willamette prior to 1980

Sulzer Pump Activities - Site 221 (continued)
Locomotive maintenance/manufacturing
Painting boats or marine vessels
Petroleum leaks/spills
PCB transformer use/spills/storage
Pump manufacturing/refurbishing
Ship/boat maintenance and/or construction
Steel fabrication
UST diesel
UST other petroleum/unknown petroleum
Sulzer Pump Activities - Site 576
Creosote treated railroad ties
Petroleum Leaks/spills
Pump manufacturing & refurbishing
UST heating oil

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