Portland Harbor Natural Resource Damage Assessment Phase 2: Allocation Summary Memo for AirGas and Air Liquide

1.0 INTRODUCTION

Airgas USA, LLC, and Air Liquide America L.P., also known as Air Liquide America Limited Partnership (Air Liquide), owners and/or operators of sites in Portland Harbor, have 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 four sites with which AirGas and Air Liquide are associated: 141, 203, 608, and 639.¹ 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, Airgas and Air Liquide's liability is calculated to be 0.76 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 Airgas and Air Liquide sites.
- Section 4 outlines Airgas and Air Liquide 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 AIRGAS AND AIR LIQUIDE SITES

Exhibit 2-1 is a map of Airgas and Air Liquide 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 AIRGAS AND AIR LIQUIDE SITES

SITE ID	ADDRESS	CURRENT OWNER	AIRGAS / AIR LIQUIDE DATES OF OWNERSHIP	AIRGAS / AIR LIQUIDE DATES OF OPERATION	SITE ACREAGE
141	6529 NW Front Ave	Schnitzer Investment Corp. (1947 – Present)	none	1950 – Present (Industrial Air Products and successors)	6.3
203	3200 NW Yeon Ave	IPC Property Owner Pool McDonald's USA LLC JBJ Holdings LLC PHK Yeon LLC Wendland Properties LLC (Years Unknown – Present)	none	1962 — 1992 (Industrial Air Products)	17.4
608	4959 NW Front Street	Lit Finance III LLC (Years Unknown – Present)	1947 - 1988 (Airco) 1988 – 1991 (NW Airgas)	1942 - 1988 (Airco) 1988 – 1991 (NW Airgas)	5.0
639	2233 NW 23rd Ave	ESCO Corp (Years Unknown – Present)	none	1989 — 1992 (Liquid Air Corporation)	0.5
Note. 1. All addresses are located in Portland, Oregon.					

EXHIBIT 2-2 AIRGAS AND AIR LIQUIDE SITE BACKGROUND INFORMATION

3.0 AIRGAS/AIR LIQUIDE OWNERSHIP AND OPERATIONS

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

Site 141 (Schnitzer Investment Corp #3 – Air Liquide)

Schnitzer Investment Corporation purchased the property from Bethlehem Steel in 1947. In December 1947, construction was completed on the acetylene and hydrogen gas manufacturing and distribution facility as well as propane and helium distribution plant. It operated under the name Schnitzer Bros. until 1950. In 1950, Industrial Air Products (IAP) took over operations at the plant, which included acetylene and hydrogen gas manufacturing and calcium hydroxide manufacturing (a byproduct of the acetylene manufacturing process). In 1969, American Cryogenics Inc., an Air Liquide company, purchased IAP and continued under the same name until 1970, when it became Liquid Air Inc. Through a

series of mergers and name changes, Liquid Air Inc. became Air Liquide America Corporation in 1994, and acetylene and hydrogen gas manufacturing operations continued at the property. In 1995, a 200-gallon compressor oil spill was noted at the site. Hydrogen manufacturing was discontinued in 2002, the same year Air Liquide America Corporation became Air Liquide America L.P. and assigned its lease for Site 141 to Air Liquide America Specialty Gases LLC, which was later merged into Airgas USA LLC. The company continues to manufacture and distribute acetylene gas and distribute hydrogen gas at the facility at Site 141.

It was noted that in the 1960s and 1970s, Schnitzer Investment stored and disposed of non-magnetic auto shredder wastes from other facilities on Site 141.

Site 203 (Schnitzer Investment Corp #5)

Schnitzer Investment Corporation owned the property at Site 203 and leased to IAP from 1962 to 1992. During this time, IAP produced oxygen and nitrogen using cryogenic distillation (1962 to 1977) and leased a building (1980 to 1992). The tax parcels are currently owned by IPC Property Owner, McDonald's USA LLC, JBJ Holdings II LLC, PHK Yeon LLC, and Wendland Properties LLC.

Site 608 (Schnitzer Investment Corp #4)

The City of Portland owned the property at Site 608 until 1942. Airco (formerly Air Reduction Pacific Co.) owned the site from 1947 to 1988. Airco and Industrial Raw Materials, LLC were operators on the property from 1942 to 1985 and produced acetylene. From 1942 to 1989, Chem Lime Corporation also operated on the property, performing lime recovery operations. In 1985, Airco ceased acetylene production and began industrial gas cylinder distribution. Northwest Airgas, Inc. acquired Airco and the property in 1988 and continued operations until 1991. Crawford Street Corporation owned the property from 1991 to 1996 and leased it to Asset Recovery for scrap metal recovery and diesel truck refueling. Schnitzer Investment Corporation purchased the property in 1996. They performed an environmental site assessment, demolished the old facilities, and redeveloped the site as a commercial and light industrial parts, decorative tiles, and small electrical switching components. The space was also used for storing telecommunication equipment and a space used for newspaper assembly. The property is currently owned by Lit Finance III LLC and continues to operate as a commercial and light industrial park.

Site 639 (Goodman Property)

The property at Site 639 was owned by Goodman and leased to Liquid Air Corporation (LAC) from 1989 to 1992 for retail welding supplies. From 1990 to 1992, LAC had a sublease with Cascade Cylinder Gases, LLC to perform the same activity on the property. The property is currently owned by ESCO Corporation.

4.0 AIRGAS AND AIR LIQUIDE ACTIVITIES

Exhibit 4-1 identifies, for each of Airgas's and Air Liquide'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 AIRGAS AND AIR LIQUIDE-RELATED ACTIVITIES¹

Activities - Site 141				
Landfill of construction and demolition debris				
Auto shredder wastes used as fill				
Landfill of dredged sediments-Willamette prior to 1980				
Landfill of scrap metal				
Landfilling of Doane Lake by surrounding properties				
Non-magnetic auto shredder storage				
Oil/water separation/filtration use				
Petroleum leaks/spills				
Slag storage or landfilling				
Activities - Site 608				
above-ground storage tank (AST) naphtha solvent				
AST other petroleum/unknown petroleum				
Fueling operations				
Ink manufacturing				
Lubricating oil used in manufacturing				
Scrap metal yard operation				
underground storage tank (UST) heating oil				
UST septic tank				
Note.				
1. Air Liquide did not conduct relevant activities on Sites 203 and 639.				

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. <u>https://www.deq.state.or.us/lq/ECSI/ecsiquery.asp?listtype=lis&listtitle=Environmental+Cleanup+Site%</u> 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 four additional documents submitted by Phase 2 parties that are settlement confidential and therefore not identified.