

[Counsel for Plaintiffs are identified
in Plaintiffs' signature blocks]

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA; the STATE OF)
OREGON; the CONFEDERATED TRIBES OF THE)
GRAND RONDE COMMUNITY OF OREGON; the)
CONFEDERATED TRIBES OF SILETZ INDIANS; the)
CONFEDERATED TRIBES OF THE UMATILLA)
INDIAN RESERVATION; the CONFEDERATED TRIBES)
OF THE WARM SPRINGS RESERVATION OF)
OREGON; and the NEZ PERCE TRIBE,)

Plaintiffs,)

v.)

ACF INDUSTRIES, LLC; AIRGAS USA LLC; AIR)
LIQUIDE AMERICA L.P.; ASH GROVE CEMENT)
COMPANY; ASHLAND INC.; BEAZER EAST, INC.;)
BNSF RAILWAY COMPANY; CALBAG METALS CO.;)
CITY OF PORTLAND; ESCO GROUP LLC; EVRAZ INC.)
NA (FKA OREGON STEEL MILLS AND GILMORE)
STEEL); GOULD ELECTRONICS INC.; HAJ, INC.,)
D/B/A CHRISTENSON OIL COMPANY; HERCULES)
LLC; KOPPERS INC.; MCCALL OIL & CHEMICAL)
CORPORATION; MCCALL OIL REAL ESTATE)
COMPANY LLC; MOREC FRONT LLC; GWC)
PROPERTIES, LLC; GWC FRONT, LLC; TANKER)
BASIN LLC; MMGL LLC; NORTHWEST PIPE)
COMPANY (FKA NORTHWEST PIPE & CASING)
COMPANY AND NORTHWEST PIPE AND CASING)
COMPANY); PACIFICORP, AN OREGON)
CORPORATION; PORT OF PORTLAND; PORTLAND)
GENERAL ELECTRIC COMPANY (PGE); PORTLAND)
TERMINAL RAILROAD COMPANY; SCHNITZER)
STEEL INDUSTRIES, INC.; SILTRONIC)
CORPORATION; SULZER PUMPS (US) INC.; and)
VALVOLINE INC.,)

Defendants.)

No. 3:23-cv-1603

COMPLAINT

Plaintiffs United States of America (“United States”), by authority of the Attorney General, on behalf of the National Oceanic and Atmospheric Administration (“NOAA”) of the U.S. Department of Commerce and the U.S. Department of the Interior (“DOI”); the State of Oregon (the “State”); the Confederated Tribes of the Grand Ronde Community of Oregon; the Confederated Tribes of Siletz Indians; the Confederated Tribes of the Umatilla Indian Reservation; the Confederated Tribes of the Warm Springs Reservation of Oregon; and the Nez Perce Tribe (collectively “Plaintiffs”), allege as follows:

I. GENERAL ALLEGATIONS

1. This is a civil action under Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9607(a); Section 311 of the Clean Water Act (CWA), 33 U.S.C. § 1321; Section 1002(b) of the Oil Pollution Act (OPA), 33 U.S.C. § 2702(b); the Oregon Hazardous Waste and Hazardous Materials Act, ORS § 465; and ORS § 468B.060, for damages for injury to, destruction of, or loss of natural resources resulting from the release of hazardous substances and discharges of oil into the Willamette River in and near Portland, Oregon.

II. JURISDICTION AND VENUE

2. This Court has jurisdiction over this case pursuant to Sections 107 and 113(b) of CERCLA, 42 U.S.C. §§ 9607 and 9613(b); Section 311(n) of the CWA, 33 U.S.C. § 1321(n); Section 1017(b) of OPA, 33 U.S.C. § 2717(b); and 28 U.S.C. §§ 1331, 1345 and 1367(a).

3. Venue is proper in this district pursuant to Section 113(b) of CERCLA, 42 U.S.C. § 9613(b); Section 1017(b) of OPA, 33 U.S.C. § 2717(b); and 28 U.S.C. § 1391(b) and (c).

III. PLAINTIFFS

4. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, Section 311(f)(5) of the CWA, 33 U.S.C. § 1321(f)(5), and 40 C.F.R. § 300.600, NOAA, on behalf of the U.S. Department of Commerce, is a trustee for certain natural resources that are the subject of this action.

5. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, Section 311(f)(5) of the CWA, 33 U.S.C. § 1321(f)(5), and 40 C.F.R. § 300.600, DOI is a trustee for certain natural resources that are the subject of this action.

6. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, Section 311(f)(5) of the CWA, 33 U.S.C. § 1321(f)(5), 40 C.F.R. § 300.605, ORS § 465, and ORS § 468B.060, the State is a trustee for certain natural resources that are the subject of this action.

7. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, and 40 C.F.R. § 300.610, the Confederated Tribes of the Grand Ronde Community of Oregon is a trustee for certain natural resources that are the subject of this action.

8. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, and 40 C.F.R. § 300.610, the Confederated Tribes of Siletz Indians is a trustee for certain natural resources that are the subject of this action.

9. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, and 40 C.F.R. § 300.610, the Confederated Tribes of the Umatilla Indian Reservation is a trustee for certain natural resources that are the subject of this action.

10. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, and 40 C.F.R. § 300.610, the Confederated Tribes of the Warm Springs Reservation of Oregon is a trustee for certain natural resources that are the subject of this action.

11. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, and 40 C.F.R. § 300.610, the Nez Perce Tribe is a trustee for certain natural resources that are the subject of this action.

12. Each trustee for natural resources identified in this section (“Trustee”) is a member of the Portland Harbor Natural Resource Trustee Council (“Trustee Council”). All members of the Trustee Council serve as trustees for the assessment and recovery of damages for injury to, destruction of, loss of and/or loss of use of natural resources and/or the services provided by those resources under their trusteeship.

IV. INJURIES TO NATURAL RESOURCES

13. The Willamette River is a highly industrialized river that flows through Portland, Oregon. As a result of releases of hazardous substances and discharges of oil from facilities located near and adjacent to the Willamette River, the United States Environmental Protection Agency listed the Portland Harbor Superfund Site (the “Site”) on the National Priorities List in 2000. 65 *Fed. Reg.* 75179, 75181 (Dec. 1, 2000).

14. The Willamette River is a “navigable water” within the meaning of Section 1001(21) of OPA, 33 U.S.C. § 2701(21), and Sections 311 and 502(7) of the CWA, 33 U.S.C. §§ 1321 and 1362(7).

15. The Willamette River is contaminated with oil and a variety of hazardous substances, including polycyclic aromatic hydrocarbons (“PAHs”), polychlorinated biphenyls (“PCBs”), cadmium, copper, lead, mercury, tributyltin (“TBT”), bis 2-ethylhexyl phthalate, dichlorodiphenyltrichloroethane (“DDT”), dichlorodiphenyldichloroethylene (“DDE”), dichlorodiphenyldichloroethane (“DDD”), and 4-methyl phenol. Overall, the Trustees have identified the presence of over 45 hazardous substances in the sediments of the Willamette River.

16. Hazardous substances and oil have been and are being released and discharged into the Portland Harbor Natural Resource Damage Assessment Area from properties and/or facilities owned and/or operated by Defendants through direct discharges, other process discharges, storm water discharges, surface water runoff, wastewater discharges, and/or groundwater and/or seep discharges, and those hazardous substances and oil have caused injury to, destruction of, loss of and/or loss of use of natural resources in the Portland Harbor Natural Resource Damage Assessment Area under Plaintiffs' trusteeship, including sediment, invertebrates, fish, wildlife, and other resources that are specifically of tribal importance. Each Trustee and the public have suffered the loss of natural resource services (including ecological services as well as direct and passive human use losses) as a consequence of those injuries.

17. The Trustee Council assessed injuries to natural resources from hazardous substances and oil in the “Portland Harbor Natural Resource Damage Assessment Area,” which includes the waters, shoreline, intertidal areas, and bottom sediments, of the Willamette River,

including Swan Island Lagoon, from approximately River Mile 12.3 to approximately River Mile 0.8 near the confluence with the Columbia River, as well as the upper 1.2 miles of the Multnomah Channel.

V. DEFENDANTS

18. Defendants (including Defendants' predecessors in interest) own and/or operate, or in the past owned and/or operated, real property and/or facilities, identified by tax parcel or other property description for each Defendant in Appendix A of this Complaint. Operations were conducted on Defendants' real property and/or facilities in Appendix A during Defendants' (including Defendants' predecessors') periods of ownership and/or operation as follows:

a. ACF Industries, LLC, is a past and present owner and past operator of the real property and facilities described in Appendix A. Operations on the identified property include: lumber mill operations; rail car repair, cleaning, sandblasting, and painting; metal fabrication and transformer repair; and wooden crate/pallet fabrication. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of diesel; underground storage of leaded gasoline and waste oil; vehicle operations and/or washing; unprotected storage of petroleum contaminated soil; and unprotected storage of spent sandblasting grit.

b. Airgas USA LLC and Air Liquide America L.P. are past and/or present owners and/or operators of the real property and facilities described in Appendix A. Operations on the identified property include: acetylene and hydrogen gas manufacturing and calcium hydroxide manufacturing (a byproduct of the acetylene manufacturing process); production of oxygen and nitrogen; and storage and disposal of non-magnetic auto shredder wastes. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: landfilling of construction and demolition debris, auto shredder wastes, dredged sediments, Doane Lake, and scrap metal; oil/water separation and filtration; petroleum leaks and/or spills; underground storage of heating oil; underground septic tank use; slag storage or landfilling; aboveground storage of naphtha solvent and other petroleum

products; fueling operations; ink manufacturing; lubricating oil use in manufacturing; and scrap metal yard operations.

c. Ash Grove Cement Company is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: lime manufacturing; production of powdered limestone and dolomite; and cement storage and distribution. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of diesel, hydraulic fluid, lubrication oil, waste oil, and other petroleum products; boat moorage or marina operations; cement/limestone manufacturing and/or distribution; use of creosote-treated railroad ties and wood pilings; extensive vehicle operations or washing; landfilling of dredged sediments; PCB capacitor use; PCB contaminated oil spillage; PCB transformer use, spills, and/or storage; petroleum leaks and spills; scrap metal yard operations; underground storage of gasoline; fueling operations; hydraulic oil leaks and spills; and ship maintenance and/or construction.

d. Ashland, Inc., Hercules, LLC, and Valvoline, Inc., collectively are past owners and past and/or present operators of the real property and facilities described in Appendix A. Operations on the identified property include: storage and/or distribution of fatty acids, petroleum products, and car care products; shipping, receiving, blending, and packaging of petroleum products; production and distribution of chemical products used in the paper industry; storage, repackaging, drum washing, and shipment of industrial chemicals, food grade materials, and plastic pellets; and repackaging, blending, and distribution of petroleum products, chemicals, resin, acids, and bases. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: steel manufacturing; petroleum leaks and/or spills; fueling operations; fuel oil use; underground storage of heating oil, diesel, waste oil, gasoline, and other petroleum products; aboveground storage of waste oil and other petroleum products; adhesives production; adhesives waste disposal; extensive vehicle operations; and landfilling of dredged sediments.

e. Beazer East, Inc. is a past operator of the real property and facilities described in Appendix A. Operations on the identified property include: distillation of coal tar to produce chemicals, oil, creosote, and pitch; and terminal operations for the receipt, storage, and distribution of pitch and creosote. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of petroleum products; coal tar distillation plant operations; coal tar pitch distribution; landfilling of coal tar distillates; disposal of coal tar distillation wastewater; oil/water separation and filtration; petroleum leaks and/or spills; and ship berthing.

f. BNSF Railway Company is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: railroad operations and related activities, including passenger and freight transport, freight handling, switching, locomotive fueling, and railroad maintenance. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: use of creosote treated railroad ties; fueling operations; petroleum leaks and spills; fuel oil use; aboveground and underground storage of petroleum products, including underground storage of diesel and Bunker C Fuel; landfilling of dredged sediments; extensive vehicle operations; unprotected storage of petroleum-contaminated soil, paint waste, and lead acid batteries; landfilling of construction and demolition debris; and steel manufacturing.

g. Calbag Metals Company is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: metals recycling operations; wire chopping; outdoor storage of metals; cutting of oversized stainless steel; baling; and metals storage and distribution. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: scrap metal yard operations; oil/water separation and filtration; aboveground storage of waste oil; and extensive vehicle operations.

h. The City of Portland is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: shipbuilding, ship maintenance, and ship berthing; lumber, chain, and steel manufacturing; mill

and machine shop operations; auto repair; metal forging, cleaning, machining, shaping, cutting, and painting; dry dock operations; lumber mill operations; boat ramp operations; fireboat moorage and operations; incinerator operations; landfilling of municipal wastes and incinerator ash; operation of released conveyance system facilities, such as outfalls and combined sewer overflow systems; paving plant operations; concrete handling operations; operation of electrical substations, transformer storage, and transformer repair; roadway operations; storage of de-icing materials; vehicle parking; laboratory operations; rail yard operations and rail car storage; coliseum operations; firefighting training operations; electrical transformer repair; and manufacturing of stone, clay, and glass. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: use of creosote-treated railroad ties and wood pilings; landfilling of dredged sediments; landfilling of construction and demolition debris; municipal landfill operations; ship berthing; ship/boat maintenance and/or construction; aboveground storage of heating oil and other petroleum products; underground storage of diesel, gasoline, heating oil, Bunker C fuel, waste oil, and other petroleum products; petroleum leaks and/or spills; boat moorage; fueling operations; waste transfer station operations; asphalt batch plant operations and/or asphalt production; extensive vehicle operations or washing; unprotected storage of petroleum contaminated soil; mechanical and/or electric motor repair and maintenance; and operation of released conveyance system facilities.

i. ESCO Group LLC is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include operation of two steel foundries and landfilling of used foundry-related waste materials, such as spent sand cores, molds, slag, and refractory materials. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: steel fabrication; industrial landfilling of steel foundry waste; landfilling of Doane Lake; above-ground storage of hydraulic fluid, waste oil, and diesel; underground storage of waste oil, diesel, and gasoline; and fueling operations.

j. EVRAZ Inc. NA is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: steel manufacturing, smelting, recycling, and storage; landfilling of waste materials; pipe coating; steel product and materials cutting, handling, and storage; and storage and repair of seagoing containers and equipment. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of diesel, gasoline, hydraulic fluid, kerosene, and other petroleum products; use of creosote-treated railroad ties and wood pilings; extensive vehicle operations; fueling operations; hydraulic fluid use; hydraulic oil leakage and/or spills; petroleum leaks and/or spills; landfilling of dredged sediments; landfilling of construction and demolition debris; oil/water separation and filtration; PCB-containing capacitor use; PCB transformer use, spills, and/or storage; underground storage of diesel, gasoline, Bunker C fuel, and other petroleum products; steel fabrication; use of lubricating oil in manufacturing; sandblasting (for other than boats or vessels); scrap metal yard operation; slag storage or landfilling; and sump discharges.

k. Gould Electronics Inc. is a past and present owner and past operator of the real property and facilities described in Appendix A. Operations on the identified property include: cable sweating, lead refining, battery breaking, and lead oxide production. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: battery breaking, hydraulic fluid use, landfilling of dredged sediments, landfilling of shredded battery casings, lead smelting and/or refining, and PCB transformer use.

l. HAJ Inc. is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: bulk petroleum blending, mixing, storage, and distribution, particularly lubricating and other specialty oils. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of kerosene, lubrication oil, and other petroleum products; underground storage of diesel and other petroleum products; extensive vehicle operations or washing; hydraulic oil leakage and/or spills; petroleum leaks and/or spills; and unprotected storage of petroleum contaminated soil.

m. Koppers Inc. is a past and present operator of the real property and facilities described in Appendix A. Operations on the identified property include: storage and distribution operations of coal tar pitch and other related products via railroad tank cars or bulk cargo ships. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of petroleum products; coal tar pitch distribution and/or storage; petroleum leaks and/or spills; ship berthing; and extensive vehicle operations or washing.

n. McCall Oil and Chemical Corporation, McCall Oil Real Estate Company LLC, Morec Front LLC, GWC Properties, LLC, GWC Front, LLC, and Tanker Basin LLC collectively are past and/or present owners and past and/or present operators of the real property and facilities described in Appendix A. Operations on the identified property include: marine terminal operations to store, blend, and distribute petroleum products, including asphalt, bunker fuel, marine diesel oil, and diesel fuel; asphalt plant operations; and operation of facilities to store and distribute industrial chemicals. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: asphalt batch plant operations and/or asphalt production; use of creosote treated wood pilings; extensive vehicle operations or washing; fuel oil use; fueling operations; landfilling of dredged sediments; use of lubricating oil in manufacturing; oil/water separation and filtration; petroleum leaks and/or spills; and aboveground storage of chemicals.

o. MMGL LLC is a past and present owner of the real property and facilities described in Appendix A. Operations on the identified property include: petroleum product handling and storage; edible oil storage; tugboat operations; car crushing; container storage; automotive trailer manufacturing; railroad spur operations; dry good storage; trucking and warehousing; truck maintenance and repair; scrap metal storage and recycling; metals recycling; log storage; steel manufacturing; ship repair and dismantling; wood products manufacturing; landfilling; acetylene manufacturing; commercial warehouse operations; wood and steel door fabrication; and commercial PCB-decommissioning. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: use

of creosote-treated wood pilings and railroad ties; landfilling of dredged sediments, auto-shredder residue, construction and demolition debris, and scrap metal; underground storage of diesel, gasoline, hydraulic fluid, heating oil, Bunker C fuel, lubrication oil, waste oil, and other petroleum products; ship berthing; ship/boat maintenance and/or construction; and storage or landfilling of slag.

p. Northwest Pipe Company is a past and present owner and past and present operator of the real property and facilities described in Appendix A. Operations on the identified property include steel pipe manufacturing; metals scrap yard operations; and storage of steel pipe and coal tar cylinders. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: steel fabrication; uncovered coal and/or coal tar storage; sandblasting (for other than boats or vessels); PCB transformer use; PCB-contaminated oil spill(s); landfilling of dredged sediments; underground storage of gasoline; and aboveground storage of diesel, gasoline, hydraulic oil, waste oil, and other petroleum products.

q. PacifiCorp is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include operation of an electrical distribution network (including poles, vaults, underground cables, submerged cables, transmission lines, transformers, and substations) and vehicle and equipment maintenance, repair, and storage. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: petroleum leaks and/or spills; storage or transporting of PCB-contaminated materials; PCB transformer use, spills, and/or storage; mechanical and/or electrical motor repair and/or maintenance; storage of lead batteries; underground storage of gasoline, kerosene, and diesel; aboveground storage of waste oil; use of creosote-treated utility poles; fueling operations; oil/water separation and filtration; and mercury spill(s).

r. Portland General Electric Company is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: power plant operations; operation of an electrical distribution network (including poles,

vaults, underground cables, submerged cables, transmission lines, transformers, and substations); and vehicle and equipment maintenance, repair, and storage. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of diesel; underground storage of heating oil; use of creosote-treated railroad ties and wood pilings; fueling operations; gas turbine power generation; landfilling of dredged sediment; PCB capacitor use; PCB transformer use; PCB oil spill(s); petroleum leaks and/or spills; oil/water separation and filtration; and storage of PCB-contaminated material.

s. Port of Portland is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: shipping terminal operations; shipbuilding and ship repair; airport operations; storage of materials, chemicals, and petroleum products; concrete mixing; stormwater and process water storage and treatment; vehicle parking and staging; sediment dredging; dock maintenance and repair; and vessel birthing. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: use of creosote-treated railroad ties and wood pilings; landfilling of construction and demolition debris, used sandblast grit, dredged sediments, and Doane Lake; petroleum leaks and/or spills; underground storage of diesel, gasoline, heating oil, waste oil, and other petroleum products; aboveground storage of diesel, gasoline, kerosene, lubrication oil, heating oil, Bunker C fuel, bilge water, waste oil, and other petroleum products; operation of unprotected petroleum sumps; coal and/or coal tar pitch storage and/or distribution; hydraulic fluid use; hydraulic oil leakage and/or spills; PCB capacitor use; PCB transformer use, spills, and/or storage; petroleum leaks and/or spills; slag storage or landfilling; extensive vehicle operations or washing; ship berthing; ship/boat maintenance and/or construction; fueling operations; application/disposal of pesticides; ballast water storage/treatment; fuel oil use; sandblasting (for other than boats or vessels); unprotected storage of spent sandblasting grit; wood preservative use; and contaminant releases from sunken ships.

t. Portland Terminal Railroad Company is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: railcar switching; locomotive servicing and fueling; railcar loading; and storage of empty railway cars. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: extensive vehicle operations (railyard); burning waste and/or debris; fueling operations; use of creosote-treated railroad ties; unprotected storage of petroleum-contaminated soil; hydraulic oil use, leakage, and/or spills; unprotected storage of spent sandblasting grit; unprotected storage of paint waste; aboveground storage of diesel, heating oil, and other petroleum products; underground storage of diesel, gasoline, heating oil, Bunker C fuel, kerosene, lubrication oil, waste oil, and other petroleum products; petroleum leaks and/or spills; fueling operations; disposal of liquid manufactured gas plant waste; coal gasification plant/refinery operations; and steel fabrication.

u. Schnitzer Steel Industries, Inc. is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: metals recycling; steel fabrication and distribution and storage of steel products, parts, and equipment; final ship assembly; ship dismantling; automobile recycling; landfilling auto shredder residue; operation of a machining, welding, and repair shop; warehousing; and truck terminal operations, including painting and repairs. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of hydraulic fluid, diesel, gasoline, waste oil, and other petroleum products; underground storage of gasoline, diesel, hydraulic fluid, lubrication oil, and other petroleum products; oil/water separation and filtration; auto-shredder residue generation and/or storage and landfilling; use of creosote-treated railroad ties and wood pilings; extensive vehicle operations; landfilling of dredged sediments; petroleum leaks and/or spills; scrap metal yard operations; ship berthing and dismantling; steel fabrication; storage of lead batteries; dissemination of lead; and mechanical and/or electric motor repair and maintenance.

v. Siltronic Corporation is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include

manufacture of hyper-pure silicon wafers. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of diesel, waste oil, and other petroleum products; generation of hazardous waste; landfilling of dredged sediments; oil/water separation and filtration; PCB-containing capacitor use; PCB transformer use, spills, and/or storage; and petroleum leaks and/or spills.

w. Sulzer Pumps (US) Inc. is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include pump manufacturing, pump refurbishing, and other manufacturing and repair activities.

Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of diesel, waste oil, and other petroleum products; underground storage of diesel, gasoline, hydraulic fluid, heating oil, waste oil, and other petroleum products; use of creosote-treated railroad ties and wood pilings; extensive vehicle operations and washing; landfilling of dredged sediments; locomotive maintenance and/or manufacturing; painting boats or marine vessels; PCB transformer use, spills, and/or storage; pump manufacturing and/or refurbishing; ship berthing; ship/boat maintenance and/or construction; slag storage or landfilling; steel fabrication; unprotected storage of spent sandblast grit; and petroleum leaks and/or spills.

19. The properties identified in Paragraph 18 of this Complaint are facilities within the meaning of Section 101(9) of CERCLA, 42 U.S.C. § 9601(9), and ORS § 465.200(13).

20. During Defendants' ownership and operations of the real properties and facilities identified in Paragraph 18 of this Complaint, hazardous substances and/or oil were released and discharged to the Willamette River through direct discharges, other process discharges, storm water discharges, surface water runoff, wastewater discharges, and/or groundwater or seep discharges. Discharges were to "navigable waters" or "adjoining shorelines" within the meaning of Section 1002(a) of OPA, 33 U.S.C. § 2702(a), and Section 311(b)(3) of the CWA, 33 U.S.C. § 1321(b)(3), and to "waters of the state" within the meaning of ORS §468B.005(10). Hazardous substances released from these properties and facilities and found in the sediments of the Portland Harbor Natural Resource Damage Assessment Area include, but are not limited to,

PAHs, PCBs, cadmium, copper, lead, mercury, TBT, bis 2-ethylhexyl phthalate, DDT, DDE, DDD, and 4-methyl phenol.

VI. FIRST CLAIM FOR RELIEF

21. Plaintiffs reallege paragraphs 1 through 20.

22. Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), provides in pertinent part, as follows:

Notwithstanding any other provision or rule of law, and subject only to the defenses set forth in subsection (b) of this section (1) the owner and operator of a vessel or a facility, (2) any person who at the time of disposal of any hazardous substance owned or operated any facility at which such hazardous substances were disposed of, ...shall be liable for, . . . (C) damages for injury to, destruction of, or loss of natural resources, including the reasonable costs of assessing such injury, destruction, or loss resulting from such a release; . . .

23. Materials disposed of and released in the Willamette River by Defendants include, but are not limited to, PAHs, PCBs, cadmium, copper, lead, mercury, TBT, bis 2-ethylhexyl phthalate, DDT, DDE, DDD, and 4-methyl phenol, which are hazardous substances within the meaning of Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).

24. The properties and facilities owned and operated, or formerly owned and operated, by Defendants, identified in Paragraph 18 of this Complaint, are facilities within the meaning of Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

25. Releases of hazardous substances, including but not limited to PAHs, PCBs, cadmium, copper, lead, mercury, TBT, bis 2-ethylhexyl phthalate, DDT, DDE, DDD, and 4-methyl phenol, have occurred in the Willamette River within the meaning of Sections 101(22) of CERCLA, 42 U.S.C. § 9601(22). The releases of these hazardous substances into the Willamette River from the facilities owned and operated, or formerly owned and operated, by Defendants have resulted in injury to, destruction of, or loss of natural resources within the trusteeship of one or more of the Plaintiffs.

26. Defendants are each a person within the meaning of Section 107 of CERCLA, 42 U.S.C. § 9607.

27. Defendants are jointly and severally liable to Plaintiffs for natural resource damages resulting from releases of hazardous substances pursuant to Section 107(a)(4)(C) of CERCLA, 42 U.S.C. § 9607(a)(4)(C).

VII. SECOND CLAIM FOR RELIEF

28. Plaintiffs reallege paragraphs 1 through 27.

29. Section 1002(a) of OPA, 33 U.S.C. § 2702(a), provides in pertinent part, as follows:

Notwithstanding any other provision or rule of law, and subject to the provisions of this Act, each responsible party for a vessel or a facility from which oil is discharged, or which poses the substantial threat of a discharge of oil, into or upon the navigable waters or adjoining shorelines or the exclusive economic zone is liable for the removal costs and damages specified in subsection (b) of this section that result from such incident.

30. Section 1002(b)(2)(A) of OPA, 33 U.S.C. § 2702(b)(2)(A), makes responsible parties liable for:

Damages for injury to, destruction of, loss of, or loss of use of, natural resources, including the reasonable costs of assessing the damage, which shall be recoverable by a United States trustee, a State trustee, an Indian Tribe trustee, or a foreign trustee.

31. The properties and facilities owned and operated, or formerly owned and operated, by the Defendants identified in Paragraph 18 of this Complaint are facilities within the meaning of Sections 1001(9) and 1002 of OPA, 33 U.S.C. §§ 2701(9) and 2702.

32. Section 1001(32) of OPA, 33 U.S.C. § 2701(32), makes owners and operators of onshore facilities responsible parties for damages resulting from the discharge of oil from those facilities.

33. The discharge of oil into the Willamette River or adjoining shorelines from the facilities owned and operated, or formerly owned and operated, by the Defendants identified in Paragraph 18 of this Complaint resulted in injury to, destruction of, or loss of natural resources within the trusteeship of one or more of the Plaintiffs. These were discharges of oil within the meaning of Section 1001(23) of OPA, 33 U.S.C. § 2701(23).

34. The Defendants identified in Paragraph 18 of this Complaint are jointly and severally liable to Plaintiffs for natural resource damages resulting from discharges of oil pursuant to Section 1002 of OPA, 33 U.S.C. § 2702.

VIII. THIRD CLAIM FOR RELIEF

35. Plaintiffs the United States and the State of Oregon reallege paragraphs 1 through 34.

36. Section 311(b)(3) of the CWA, 33 U.S.C. § 1321(b)(3), provides in pertinent part, as follows:

The discharge of oil or hazardous substances (i) into or upon the navigable waters of the United States, adjoining shorelines, or into or upon the waters of the contiguous zone . . . or which may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the United States . . . in such quantities as may be harmful as determined by the President under paragraph (4) of this subsection, is prohibited

37. Section 311(f)(2) of the CWA, 33 U.S.C. § 1321(f)(2), provides in pertinent part, as follows:

Except where an owner or operator of an onshore facility can prove that a discharge was caused solely by (A) an act of God, (B) an act of war, (C) negligence on the part of the United States Government, or (D) an act or omission of a third party without regard to whether an such act or omission was or was not negligent, or any combination of the foregoing clauses, such owner or operator of any such facility from which oil or a hazardous substance is discharged in violation of subsection (b)(3) of this section shall be liable to the United States Government for the actual costs incurred under subsection (c) of this section for the removal of such oil or substance by the United States Government

38. Section 311(f)(4) of the CWA, 33 U.S.C. § 1321(f)(4), provides in pertinent part, as follows:

The costs of removal of oil or a hazardous substance for which the owner or operator of a vessel or onshore or offshore facility is liable under subsection (f) of this section shall include any costs or expenses incurred by the Federal Government or any State government in the restoration or replacement of natural resources damaged or destroyed as a result of a discharge of oil or a hazardous substance in violation of subsection (b) of this section.

39. The properties and facilities owned and operated, or formerly owned and operated, by Defendant, identified in Paragraph 18 of this Complaint, are onshore facilities within the meaning of Section 311(f)(1) of the CWA, 33 U.S.C. § 1321(f)(1).

40. There have been discharges of oil and hazardous substances, within the meaning of Section 311(a)(1) & (14) of the CWA, 33 U.S.C. § 1321(a)(1) & (14), in harmful quantities into the Willamette River and adjoining shorelines from the facilities.

41. Discharges of oil and hazardous substances from the facilities into the Willamette River or adjoining shorelines have affected, damaged, or destroyed natural resources belonging to, appertaining to, or under the exclusive management authority of the United States.

42. Defendants are jointly and severally liable to the United States and State of Oregon for natural resource damages resulting from discharges of oil and hazardous substances into the Willamette River or adjoining shorelines pursuant to Section 311(f) of the CWA, 33 U.S.C. § 1321(f).

IX. FOURTH CLAIM FOR RELIEF

43. Plaintiff the State of Oregon realleges paragraphs 1 through 42.

44. ORS § 465.255(a), provides in pertinent part as follows:

(1) (1) The following persons shall be strictly liable for those remedial action costs incurred by the state or any other person that are attributable to or associated with a facility and for damages for injury to or destruction of any natural resources caused by a release:

(a) Any owner or operator at or during the time of the acts or omissions that resulted in the release.

(b) Any owner or operator who became the owner or operator after the time of the acts or omissions that resulted in the release, and who knew or reasonably should have known of the release when the person first became the owner or operator.

(c) Any owner or operator who obtained actual knowledge of the release at the facility during the time the person was the owner or operator of the facility and then subsequently transferred ownership or operation of the facility to another person without disclosing such knowledge.

(d) Any person who, by any acts or omissions, caused, contributed to or exacerbated the release, unless the acts or omissions were in material compliance with applicable laws, standards, regulations, licenses or permits.

45. Releases to the Willamette River from the properties owned and operated, or formerly owned and operated, by Defendants, identified in Paragraph 18 of this Complaint, include hazardous substances within the meaning of ORS § 465.200(16).

46. The properties and facilities identified in Paragraph 18 of this Complaint are facilities within the meaning of ORS § 465.200(13).

47. Releases of hazardous substances have occurred in the Willamette River within the meaning of ORS § 465.200(22).

48. Defendants' releases of hazardous substances that have occurred constitute "pollution" within the meaning of ORS § 468B.005(5).

49. The natural resources that have been and continue to be injured, destroyed, or lost by the release of hazardous substances from the facilities owned or operated, or formerly owned or operated, by the Defendants include fish, invertebrates, birds, sediments, and other such natural resources.

50. The State of Oregon has incurred and continues to incur costs related to the assessment of injury to natural resources caused by the releases of hazardous substances from the facilities owned or operated, or formerly owned or operated, by the Defendants identified in Paragraph 18 of this Complaint.

51. Pursuant to ORS § 465.255 and ORS § 468B.060, Defendants are strictly liable, jointly and severally, to the State of Oregon for all damages to natural resources in the Willamette River, resulting from the release of hazardous substances at or from the Defendants' owned and operated, or formerly owned and operated, facilities.

X. REQUEST FOR RELIEF

WHEREFORE, Plaintiffs request that this Court enter judgment against Defendants jointly and severally:

(1) For damages for injury to natural resources resulting from the discharges of oil or releases of hazardous substances into the Willamette River (including its waters, shoreline, intertidal areas, and bottom sediments), including the cost of assessing such damages; and

(2) Awarding Plaintiffs such other and further relief as this Court may deem appropriate.

Dated: November 1, 2023

UNITED STATES OF AMERICA

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PORTLAND HARBOR COMPLAINT

APPENDIX A

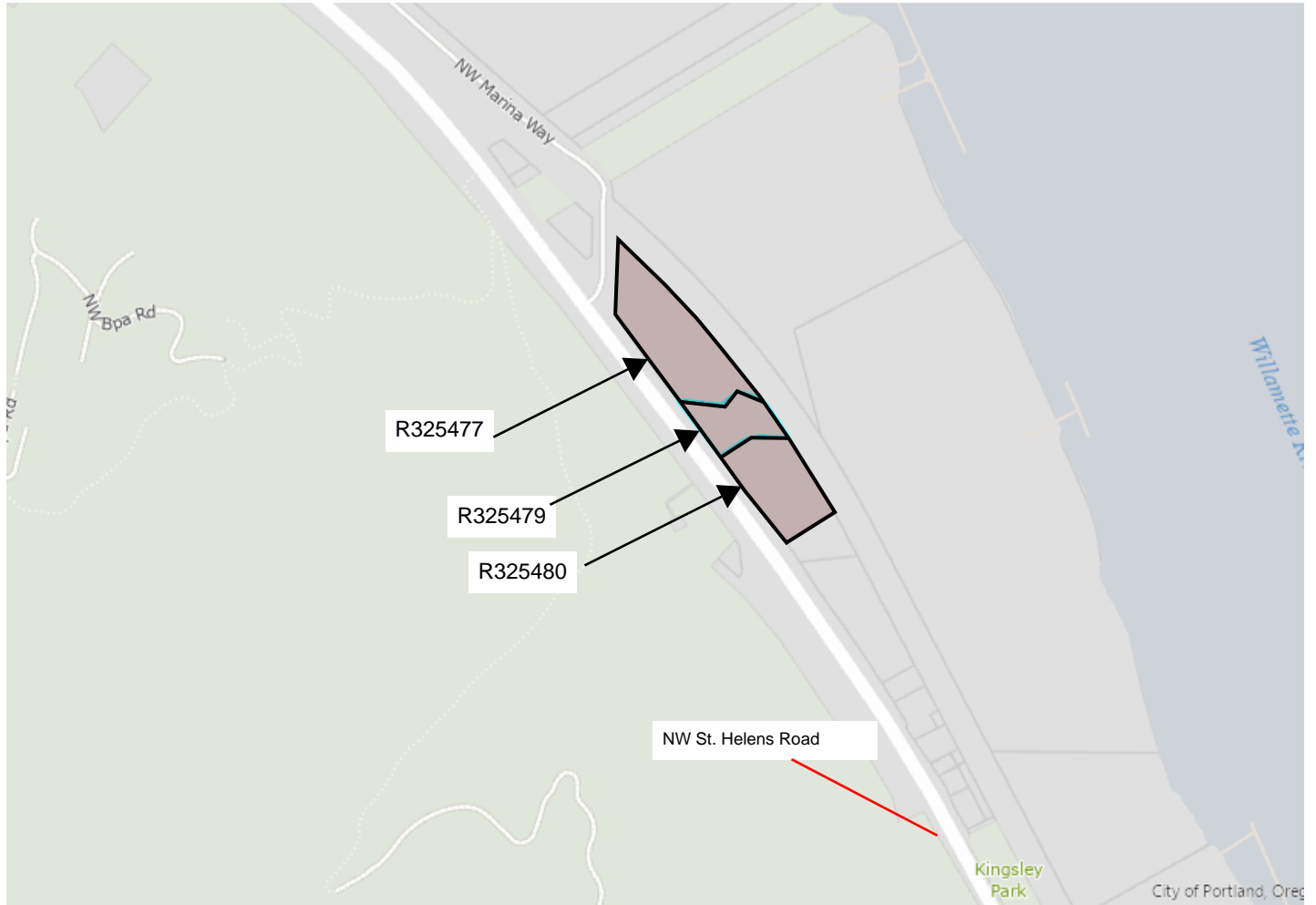
Appendix A – ACF Industries LLC

The properties listed below are identified for ACF Industries LLC for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID number	Street Address	Assessor's Parcel Number	Alt Account Number	Notes
68	12160 NW St. Helens Road	R325480	R971340300	See attached map
68	12160 NW St. Helens Road	R325479	R971340290	See attached map
68	12160 NW St. Helens Road	R325477	R971340230	See attached map

Map Showing Area of Tax Parcels

ACF Industries, 12160 NW St. Helens Road, Portland, OR



Property outline accessed from Multnomah County Oregon Property Records
website 13 July 2021:

https://www.portlandmaps.com/detail/property/NW-ST-HELENS-RD/R325477_did/

Appendix A – Air Liquide America L.P. and Airgas USA LLC

The properties listed below are identified for Air Liquide America L.P. and Airgas USA LLC for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID	Street Address	County Tax Parcel ID
141	6529 NW Front Avenue	R961130330
203	3208 NW Yeon Avenue 3330 NW Yeon Avenue	R649701500 R941291430 R649701460 R941291710 R649701480 R941280950 R941291700
608	4959 NW Front Street	R941190500
639	2233 NW 23rd Avenue	R215300400 R215300420

Appendix A – Ash Grove Cement Company

The properties listed below are identified for **Ash Grove Cement Company** for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID number	Street Address	County Tax Parcel ID	Notes
Site 21	13939 N. Rivergate Blvd.	R325200 (alternate account no.: R971260190) R646099 (alternate account no.: R971260191)	Includes the docks identified in the attached map.
Site 275	3737 N. Port Center Way	R316054 (alternate account no.: R941210770) R237739 (alternate account no.: R649729850) R646339 (alternate account no.: R649729801) R646340 (alternate account no.: R941210771) <i>Inactive former ID numbers, cancelled into R316054:</i> R316051 (alternate account no.: R941210750) R316011 (alternate account no.: R941210330) R316000 (alternate account no.: R941210150)	Includes the docks identified in the attached map.
Site 275	2700 N. Port Center Way	R237733 (alternate account no.: R649729800)	Includes the docks identified in the attached map.



Site 21 – 13939 N. Rivergate Blvd.



Site 275 – 3737 N. Port Center Way



Site 275 – 2700 N. Port Center Way

Appendix A – Beazer East, Inc.

The properties listed below are identified for Beazer East, Inc. for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID number	Street Address	Assessor's Parcel Number	Alt Account Number	Notes
123	7540 NW St. Helens Road	R502592	R961130540	See Figure 1
123	7540 NW St. Helens Road	R324213	R961130410	See Figure 1
123	7540 NW St. Helens Road	R324113	R961120420	See Figure 1
123	7540 NW St. Helens Road	R324165	R961121230	See Figure 1
123	7540 NW St. Helens Road	R324160	R961121130	See Figure 1
123	7540 NW St. Helens Road	R324172	R961121310	See Figure 1
123	7540 NW St. Helens Road	R324159	R961121120	See Figure 1
123	7540 NW St. Helens Road	R324171	R961121300	See Figure 1
123	7540 NW St. Helens Road	R324170	R961121290	See Figure 1



Appendix A-Identification of BNSF Railway Company Properties

The locations and extent of BNSF Railway Company (BNSF) properties, including historical and current ownership and/or operations areas, are identified in this Appendix A for this Complaint. Identification is made by both (1) tax parcel numbers from the Multnomah County Department of County Management Assessment and Taxation to the extent applicable, and (2) as contained within the green defined locations on the referenced attached Maps 1-3 on pages 4-6 below, which also encompass some locations that do not necessarily have tax parcel numbers (for example, the BNSF Railroad Bridge and certain current streets areas). Where certain property areas have had changes in tax numbers due to transactions or redevelopment, both current and former tax parcel numbers are listed where known for clarity. The listed Site ID numbers are numbers which were designated by the Trustees and have been included for reference. The boundaries of some Site ID locations contained in Map 3 no longer exactly conform to current tax numbers for reasons noted above regarding changes in applicable tax numbers.

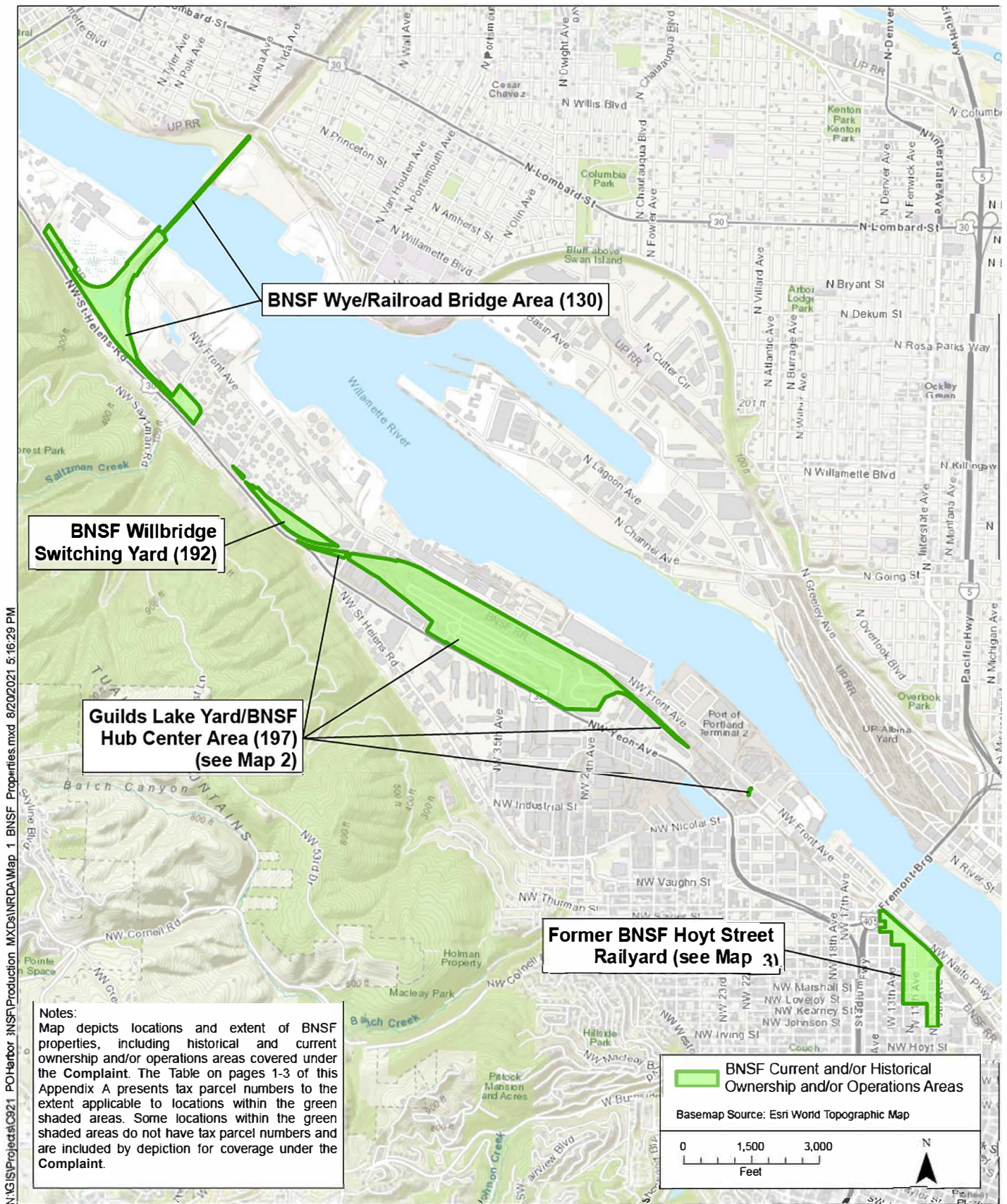
Trustees' Site ID number	Street Address	Current or Former County Tax Parcel Number
BNSF Wye/Railroad Bridge Area¹ (Including Map 1, Appendix A, p.4)		
130	Wye parcel: 6330-6346 NW St. Helens Rd	Wye parcel: R961130020
BNSF Willbridge Switching Yard (Including Map 1, Appendix A, p. 4)		
192	5814 NW Doane Ave.	R941190510
192	5814 NW Doane Ave.	R941190520
192	5814 NW Doane Ave.	R941190530

¹ "Wye" is a descriptive term for the area containing segments of BNSF mainlines and part of Doane Lake, and connecting with the west end of BNSF's railroad bridge across the Willamette River. The tax number for most of the Wye is R961130020. While no mailing address or any sort of office exists at the Wye, Portland Maps lists address numbers "6330-6346 NW St. Helens Road" for the Wye area. The mainline segment on the west border of the Wye parcel and the connecting BNSF bridge and its east end embankment, included in Maps 1 and 2, have no tax parcel number or address.

Trustees' Site ID number	Street Address	Current or Former County Tax Parcel Number
Guilds Lake Yard/BNSF Hub Center² Area (Including Maps 1 and 2, Appendix A, pp. 4 and 5)		
197	3500 NW Yeon Ave.	R941190010
197	3500 NW Yeon Ave.	R941190040
197	3500 NW Yeon Ave.	R941190170
197	3500 NW Yeon Ave.	R941190180
197	3500 NW Yeon Ave.	R941190350
197	3500 NW Yeon Ave.	R941190560
197	3500 NW Yeon Ave.	R941190570
197	3500 NW Yeon Ave.	R941190580
197	3500 NW Yeon Ave.	R941190590
197	3500 NW Yeon Ave.	R941190600
197	3500 NW Yeon Ave.	R941190610
197	3500 NW Yeon Ave.	R941190660
197	3500 NW Yeon Ave.	R941190670
197	3500 NW Yeon Ave.	R941190830
197	3500 NW Yeon Ave.	R941200040
197	3500 NW Yeon Ave.	R941201230
197	3500 NW Yeon Ave.	R941201250
197	3500 NW Yeon Ave.	R941280360
197	3500 NW Yeon Ave.	R941290680
197	3500 NW Yeon Ave.	R941290730
197	3500 NW Yeon Ave.	R941292130
Former BNSF Hoyt Street Railyard (Including Maps 1 and 3, Appendix A, pp. 4 and 6)		
316G	NW 9 th Ave.	R001500010
316G	NW 9 th Ave.	R180220350
316G	NW 9 th Ave.	R180220354
316G	NW 9 th Ave.	R180222160
316G	NW 9 th Ave.	R180222190
316G	NW 9 th Ave.	R405841300
316G	NW 9 th Ave.	R883801710
316G	NW 9 th Ave.	R405841350
316G	NW 9 th Ave.	R405841400
316G	NW 9 th Ave.	R405841450
316G	NW 9 th Ave.	R405840750
316G	NW 9 th Ave.	R405841500

² BNSF's Hub Center has operated and operates on a leased portion of some of or parts of the listed tax parcels within Guilds Lake Yard. The address for the BNSF Hub Center is 3930 NW Yeon Ave.

Trustees' Site ID number	Street Address	Current or Former County Tax Parcel Number
Former BNSF Hoyt Street Railyard (Including Maps 1 and 3, Appendix A, pp. 4 and 6) (continued)		
316G	NW 9 th Ave.	R405841550
316G	NW 9 th Ave.	R405841600
316G	NW 9 th Ave.	R405841650
316H	NW 9 th Ave.	R405841250
316H	NW 9 th Ave.	R405841700
316H	NW Overton & NW 11 th Ave.	R405840780
316I	NW 9 th Ave.	R179750010
316I	NW 9 th Ave.	R405840900
316I	NW 9 th Ave.	R405840950
316I	NW 9 th Ave.	R405841000
316I	NW 9 th Ave.	R405841050
318G	NW 9 th Ave.	R252050010
318G	NW 9 th Ave.	R405840790
318G	NW 9 th Ave.	R405841200
333I	NW 9 th Ave.	R405840800
333I	NW 9 th Ave.	R405840850
335I	NW 9 th Ave.	R405840350
335I	NW 9 th Ave.	R405840400
623H	NW 9 th Ave.	R405840770
623H	NW 9 th Ave.	R405840764
623I	NW 9 th Ave.	R405840010
624I	NW 9 th Ave.	R564380010
625I	NW 9 th Ave.	R494200010
626I	NW 9 th Ave.	R659520010
627I	NW 9 th Ave.	R102280010
628F	900 NW Lovejoy St.	R652720880
628F	900 NW Lovejoy St.	R652720910
637	920 NW Kearney St.	R652720940
637	920 NW Kearney St.	R652720970
638	1020 NW 12 th Ave.	R801600010





BNSF Appendix A, Map 2.
Guilts Lake Yard/BNSF Hub Center Current and Historical
Ownership and/or Operations Areas



BNSF Appendix A, Map 3.
BNSF Former Hoyt Street Railyard Historical Ownership
and/or Operations Areas

Appendix A – Calbag Metals Company

The properties listed below are identified for Calbag Metals Company for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the current Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID	County Tax Parcel ID	Street Address	Alternative Account Number
467	R490749	2495 NW Nicolai St (including NW 25 th Ave alley)	R941292191
	R490521		R941292190
	R646107		R941292192
	R286791	2622 NW 25 th Place	R829100150
	R286790		R829100140
	R286793		R829100190
	R286792		R829100170
653	R295994	2500 NW Nicolai Street	R861700530
652	R682748	2615 NW Industrial Street a/k/a 2530 NW 25 th Place	R941292220
512	R316519 R650129 R650127	2710 NW Industrial Street	R941291940 R941291942 R941291941
563	R316353	2455 NW Nicolai Street	R941280830
572	R174666 R174668 R636480	3441 NW Guam Street	R347602940 R347602943 R347602946 R941291910
61	R325522 R123693	12005 N. Burgard Road	R971350710 R118300200
194	R315830	4927 NW Front Avenue	R941190450

Appendix A – City of Portland

The properties and facilities listed below are identified for the City of Portland for purposes of this Complaint. The City's released properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number and not the Site number. The City's released conveyance system facilities are indicated on the attached map and are identified by City of Portland outfall number (OF#) and encompass the City's associated facilities for each outfall inclusive of the collection facilities, treatment facilities and pump stations.

Site ID Number	County Tax Parcel ID (RNO)	Site ID Number	County Tax Parcel ID (RNO)
61	R118300200 R971350710	125	R961130010 R961130480
62	R971350340 R971350460	126	R739100250 R739100380 R739101160 R739101320
72	R961020380	127	R739100180 R961120390 R961120410 R961120990 R961121240 R961121420
112	R425800090 R425800110 R425800150 R425800170 R425800230 R425806020 R425806050 R425806160 R425806620 R425806900 R425807000 R425807250 R425807450 R425807470 R425807670	176	R649867690 R649867700 No RNO: 1N1E20-A-TR-A
124	R961130320 R961130040	190	R941201040

Site ID Number	County Tax Parcel ID (RNO)	Site ID Number	County Tax Parcel ID (RNO)
193	R941190770	607	R118300100
195	R649831490 R941211160	611	No Tax Id. Bonneville Power Right of Way at River Mile 3.4
213	R941280830 R941290860 R941290910 R941291030 R941291570 R941291580 R941291840	619	R941291580
222	R649671170 R766004790	622	R009618320 R009618330
278	R649729844 R941280350	652	R941292220
306	R115200010 R180236820 R180237020	213	R941280990
414	R009618170 R009618210 R009618290 R009618370 R009618510 R203800090 R204000100 R244901570 R244901590 R396201240 R553000700 R553000800 R553001000 R553001200 R553001510 R553001610 R553001620 R553001640 R903701740 R009618300 R244902190	279	R009617390
528	R941291830	279A	R009617400

Site ID Number	County Tax Parcel ID (RNO)	Site ID Number	County Tax Parcel ID (RNO)
279B	R009616030 R009616090	348B	R850600350 R850600400 R850600450
279C	R009616770	355J	R180200020
306A	R649812730 R649812740	465A	R850600050
306B	R850600150 R850600250 R850600300		
306C	R180217550 R180220230 R180236410 R180236460 R180237200 R180237360 R180237370 R793100300		
306D	R793100100 R793100150 R793100250 R793100350 R793100400		
306E	R180236250		
311C	R180217520 R180236470 R180217530 R180236400 R180236420 R180237210		
316D	R793100200		
316H/623H	R405840770		
334A	R649812750		
355K	R180200030		
336D	R793100050		

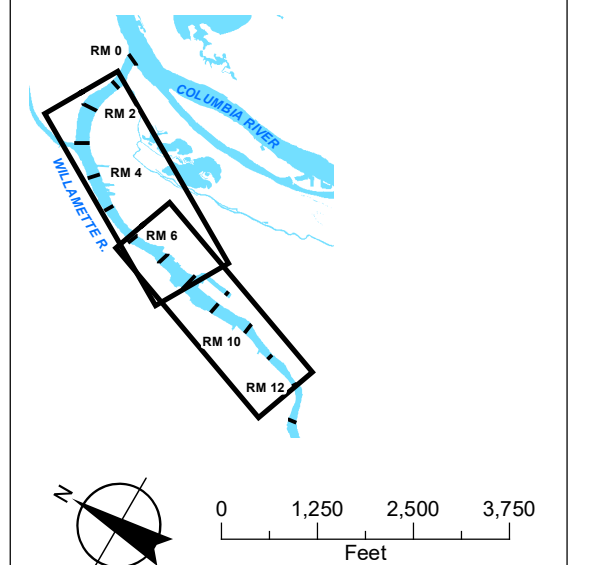


Appendix A

City of Portland Released Conveyance System Map

LEGEND

- City Outfall, Active
- City Outfall, Abandoned



Date: October 5, 2021
Data Sources: BES, Aerial COP 2020



Appendix A – ESCO Group LLC

The properties listed below are identified for ESCO Group LLC for purposes of this Complaint. Properties are identified by the Multnomah County property tax ID and assessor map and lot number. The street address as well as either the Site ID number or, where applicable, the ESCO ID number, are listed for each property in order to provide additional context and reference. However, the property boundaries are based on the current assessor map and lot number, not the street address, the Site ID number or the ESCO ID number.

Site ID / ESCO ID	Street Address	Property Tax ID	Alternate Account Number	Assessor Map and Lot Number
138	6900 NW Front Ave.	R324216	R961130440	1N1W13A 00500
203	3200 and/or 3208 NW Yeon Ave.	R236763 R236762 R236761	R649701500 R649701480 R649701460	1N1E29AA 01400 1N1E29AA 01500 1N1E29AA 01600
215	2211 NW Brewer St.; 2760 NW Yeon Ave.; 2770 NW Yeon Ave.	R316299 R646139 R316331 R316323 R493040	R941280050 R941280531 R941280530 R941280410 R941281060	1N1E28BC 01500 1N1E28BC 01600A1 1N1E28BC 01600 1N1E28BC 01400 1N1E28BC 01601
224	2245 NW Suffolk St.	R119093	R094600010	1N1E28BC 00700
304	1650 NW Naito Parkway	R699148	R649911100	1N1E28DD 00402
566	2407 NW 28th Ave.	R266228 R266229	R748500100 R748500150	1N1E29DB 00600 1N1E29DB 00700
572	3136 NW 35th Ave.	R174666 R174668 R636480	R347602940 R347602943 R347602946	1N1E29BA 00700
609	2535 NW 28th Ave.	R186833	R414900490	1N1E29DB 00400
639	NW Corner 23rd and NW Roosevelt St.	R148111	R215300420	1N1E28CB 03000
ESCO Site A	2141 NW 25th Ave.	R316317	R941280370	1N1E28C 00100
ESCO Site B	2141 NW 25th Ave.	R227128 R227136	R612701390 R612701560	1N1E29DD 01600 1N1E29DD 00100
ESCO Site F	2300 NW 26th Ave.; 2127 NW 26th Ave.; 2635 NW Wilson St.	R316501 R316509 R316491	R941291680 R941291750 R941291530	1N1E29DA 01900 1N1E29DA 01400 1N1E29DA 01300
ESCO Site H	2404 NW Nicolai St.	R295992	R861700010	1N1E28CB 00700
ESCO Site I	2414 NW Nicolai St.	R295993	R861700170	1N1E28CB 00800

Site ID / ESCO ID	Street Address	Property Tax ID	Alternate Account Number	Assessor Map and Lot Number
ESCO Site K	2539 NW Vaughn St.	R227129	R612701410	1N1E29DD 00200
ESCO Site L	Part of 2300 NW 26th Ave.	R316445	R941291050	1N1E29DA 01800
ESCO Site M	2300 NW 26th Ave.	R316380	R941290100	1N1E29DA 01700
ESCO Site O	SW Corner 23rd and NW Roosevelt St.	R148103	R215300280	1N1E28CB 03100
ESCO Site P	2321 NW Roosevelt St.	R148112	R215300450	1N1E28CB 02900
ESCO Site Q	2133 NW York St.	R269737 R269738	R766001590 R766001610	1N1E28CA 02900 1N1E28CA 03000
ESCO Site R	2306 NW Reed St.	R148122	R215300840	1N1E28CB 01900 1N1E28CB 02000 1N1E28CB 02100
ESCO Site T	2380 NW Roosevelt St.	R148109	R215300380	1N1E28CB 03700
ESCO Site U	NE Corner 24th and NW Roosevelt St.	R148113	R215300460	1N1E28CB 02800
ESCO Site X	2211 NW York St.	R269746	R766001970	1N1E28CA 04600
ESCO Site Y	2249 NW York St.	R269745 R649663 R269744	R766001950 R766001890	1N1E28CA 04200 1N1E28CA 04300
ESCO Site AA	2335 NW 23rd Pl.	R148127	R215300970	1N1E28CB 01500
ESCO Site BB	2345 NW Nicolai St.	R316333 R316351 R316319	R941280550 R941280810 R941280390	1N1E28BC 01900 1N1E28BC 02000 1N1E28BC 02100
ESCO Site CC	2400 NW 23rd Pl.; 2425 NW 23rd Ave.	R651952 R651953	R766002231 R766002232	1N1E28CB 00100A1 1N1E28CB 00100A2
ESCO Site DD	2425 NW 23rd Pl.	R269747	R766002070	1N1E28CB 00300

Appendix A – EVRAZ Inc. NA

The properties listed below are identified for EVRAZ Inc. NA for purposes of this Complaint. Properties are identified by current legal descriptions from the Multnomah County Department of County Management Assessment and Taxation. The attached Figures, and where available, the Site ID number, street address, and parcel identification number also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current legal description, not the Site number or the street address.

<u>Site ID number</u>	<u>Street Address</u>	<u>County Parcel ID</u>	<u>Legal Description</u>	<u>Notes</u>
157	5555 N. Channel Ave (Building #4)	R543777 (R649840290) R543779 (R649840291); R593920 (R649840292); R646345 (R649840293); R652118 (R649840298)	Partition Plat 2004-8, Lot 1, TL 301	
158	5851 N. Lagoon Avenue	R315645 (R941170730); R315646 (R941170731); R315691 (R941170890)	Section 17 1N 1E, TL 500; Section 17 1N 1E, TL 500 Section 17 1N 1E, TL 700	

<u>Site ID number</u>	<u>Street Address</u>	<u>County Parcel ID</u>	<u>Legal Description</u>	<u>Notes</u>
160	5555 N. Channel Ave (Building #9)	R598050 (R649831527);	Section 20 1N 1E, Partition Plot 2003-38, Lot 3, TL 108	
		R315940 (R941200830; currently part of Site 85);	Section 20 1N 1E, TL 200;	
		R540489 (R649831522)	Partition Plat 2003-38, Lot 3, TL 105	
		R315718 (R941171190)	Section 17 1N 1E, TL 900	
		R315965 (R941201110)	Section 20 1N 1E, TL 1000	
		R315966 (R941201120)	Section 20 1N 1E, TL 900	
		R315967 (R941201130)	Section 20 1N 1E, TL 800	
		R315923 (R941200620)	Section 20 1N 1E, TL 200	
		R315951 (R941200950)	Section 20 1N 1E, TL 1200	
		R316060 (R941210820)	Section 21 1N 1E, TL 1100	
		R490451 (R941201300)	Section 20 1N 1E, TL 1300	
		R316061 (R941210830)	Section 21 1N 1E, TL 500	
		R236880 (R649704100)	Partition Plat 1990-69, Lot 1, TL 100	
		R238103 (R649735970)	Partition Plat 1993-150, Lot A	

<u>Site ID number</u>	<u>Street Address</u>	<u>County Parcel ID</u>	<u>Legal Description</u>	<u>Notes</u>
182	4950 NW Front Avenue; 5034 NW Front Avenue; 5200 NW Front Avenue; Unknown property address between 4927 NW Front Avenue and 4700 NW Front Avenue on west side of NW Front Avenue	R238223 (R649741630); R238218 (R649741610); R315893 (R941191230); R238220 (R649741620); R315838 (R941190540)	Partition Plat 1994-41, Lot 3 (Section 19A 1N, 1E TL 900); Partition Plat 1994-41, Lot 1 (Section 19A 1N 1E, TL 1000); Section 19 1N 1E, TL 100; Partition Plat 1994-41, Lot 2 (Section 19A 1N 1E, TL 1100); Section 19 1N 1E, TL 1500	Map provided for reference (Figure 3). Includes all docks, trestles, dolphins, pilings, water intake, equipment, and all other structures affixed thereto or otherwise appurtenant to property over time. Includes all related easements, permits, licenses, rights-of-way, or other possessory interests in other properties over time: an oil pipeline across Port of Portland property; road and railroad spur easements across 5480 NW Front Avenue; and a railroad spur easement across NW Front Avenue and 4700 NW Front Avenue.
142	6161 NW 61 st Avenue	R324191 (R961130130)	Section 13 1N 1W, TL 600	
13	14400 N. Rivergate Blvd	R239681 (R649774290)	Section 26, 2N 1W, Partition Plat 1997-108, Lot 1, TL 800	Map provided for reference (Figure 2). Includes all docks, trestles, dolphins, pilings, water intake, equipment, and structures affixed thereto or otherwise appurtenant to property over time. Includes easements and rights of way: track and rail easements and natural gas pipeline easements and rights of way across adjacent properties.

<u>Site ID number</u>	<u>Street Address</u>	<u>County Parcel ID</u>	<u>Legal Description</u>	<u>Notes</u>
60	9040 N. Burgard Way	R3225527 (R971350740)	Section 35 2N 1W, TL 300	
64	11920 N. Burgard Rd. 11920 WI / N. Burgard Rd.	R325486 (R971350130); R251997 (R687300050); R325491 (R971350260); R325532 (R971350770); R501677 (R971360410);	Section 35 2N 1W, TL 1200; RAMSEY VILLA AC, LOT F-H&J TL 600; Section 35 2N 1W TL 1500; Section 35 2N 1W TL 1400; Section 36 2N 1W TL 700	
73	11040 N. Lombard Port of Portland Terminal 4	POP Terminal 4 Berths 414/415 R323783 (R961020930); R537423 (R961021330); R323764 (R96102390); R323769 (R961020420); R323790 (R961021020) R324084 (R961110340); R323778 (R961020630)	Section 02 1N 1W, TL 300; Section 02 1N 1W, TL 800; Section 02 1N 1W, TL 1000; Section 02 1N 1W, TL 200; Section 02 1N 1W, TL 2400; Section 11 1N 1W, TL 100 Section 02 1N 1W, TL 900	

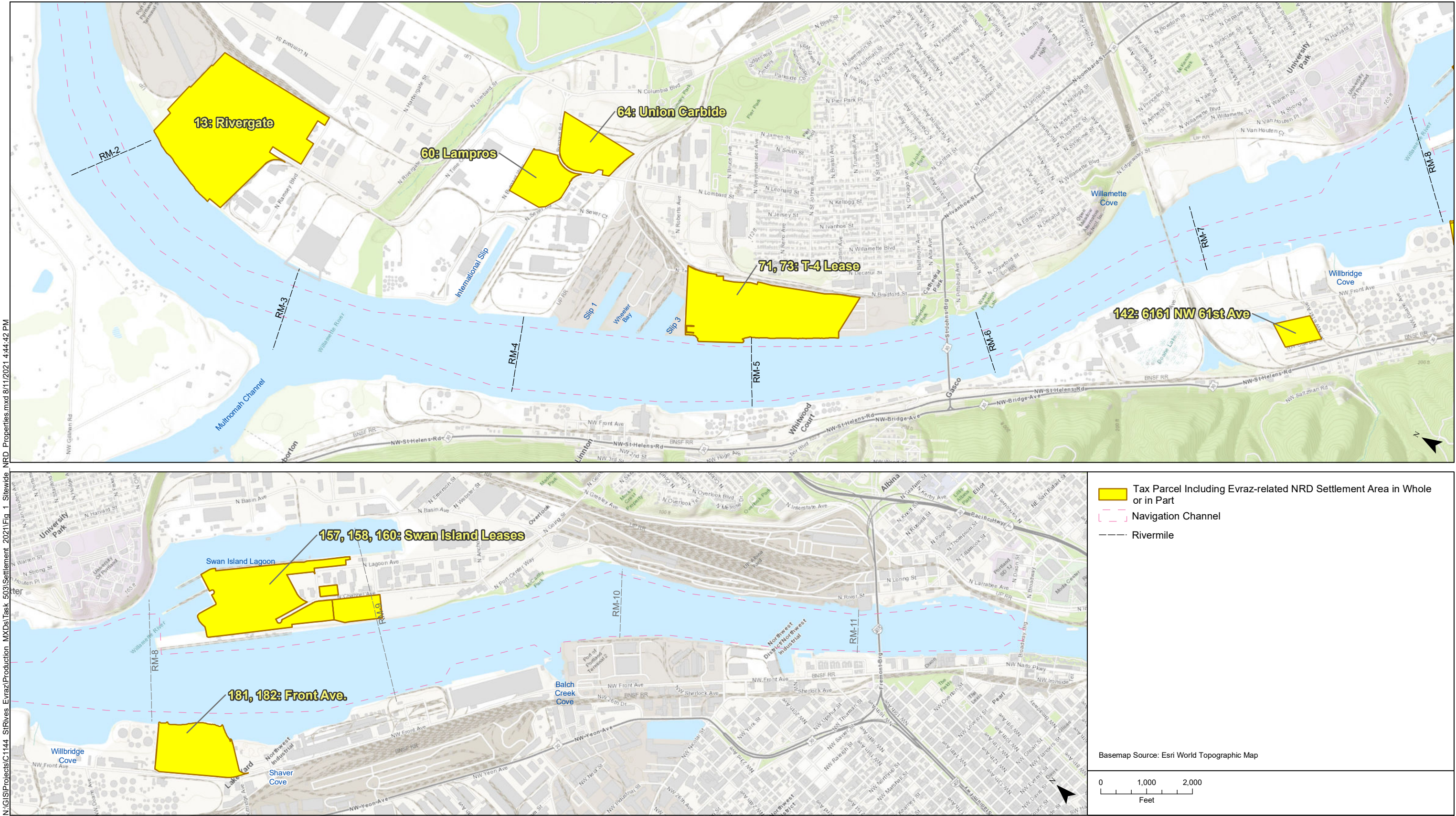


Figure 1.
NRD Settlement Areas for Evraz-Related Properties

N:\GIS\Projects\C1144 StRives Evraz\Production MXDs\Task 503\Settlement 2021\Fig 2 Rivergate Property.mxd 8/1/2021 5:14:27 PM



Figure 2.
Parcels Covered by Evraz NRD Settlement
Rivergate Property

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Appendix A – Gould Electronics Inc.

The properties listed below are identified for Gould Electronics Inc. for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID number	Street Address	County Tax Parcel ID
Site 140	5909 NW 61 st Avenue	R961130350

Appendix A – HAJ, Inc.

The properties listed below are identified for HAJ, INC. d/b/a CHRISTENSON OIL COMPANY for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID number	Street Address	Multnomah County Tax Parcel ID	State ID
503	3821 NW St. Helens Road Portland, Oregon 97210	R253424 (Alt. Acct. #: R697400830) R253423 (Alt. Acct. #: R697400800) R253422 (Alt. Acct. #: R697400770)	1N1E19DD-01200 1N1E19DD-01300 1N1E19DD-01400
503	3865 NW St. Helens Road Portland, Oregon 97210	R315874 (Alt. Acct. #: R941190980)	1N1E19DC-00500

Appendix A – Hercules, LLC, Ashland, Inc., and Valvoline, Inc.

The properties listed below are identified for:

- Hercules, LLC, successor in interest to Hercules Incorporated;
- Ashland Inc., successor in interest as of August 1, 2022 to Ashland LLC (which was successor in interest to previous Ashland, Inc.); and
- Valvoline, Inc., the formerly wholly owned subsidiary of Ashland LLC

for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID number	Street Address	County Tax Parcel ID	Notes
123	7540 NW Helens Rd.	R961120420 R961121300 R961121120 R961121290 R961121310 R961121130 R961121230 R961130540 R961130410	NW Natural Gas Co. Property associated with Hercules, LLC short term storage
239	6650 N. Basin Avenue	R941171070 R941170970 R941171220	Ashland Inc. formerly leased property
271	6000 N. Cutter Circle	R605600160	Ashland Inc. / Valvoline, Inc. formerly leased property
279B	2308 N. Clark Ave.	R009616030 R009616090	Ashland Inc. / Valvoline, Inc. formerly owned property
508	3366 NW Yeon Ave.	R941201260 R941290010 R941292120	Hercules, LLC property
509	3322 NW 35 th Ave.	R941291370	Ashland Inc. formerly leased property
510	2800 NW 31 st Ave.	R941291160	Ashland Inc. formerly leased property

Appendix A – Koppers Inc.

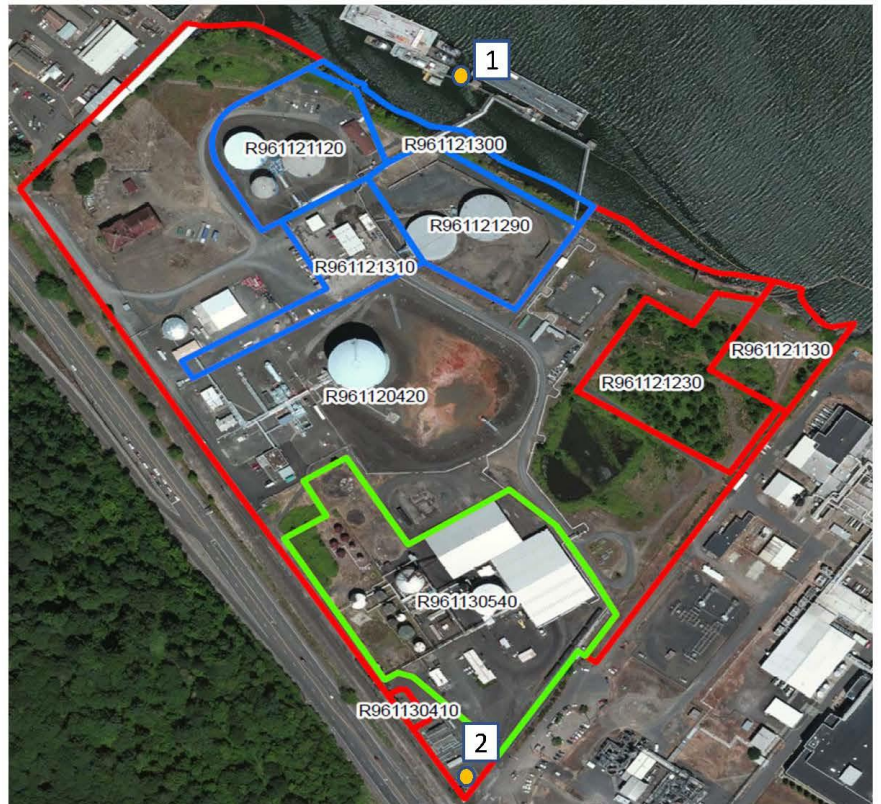
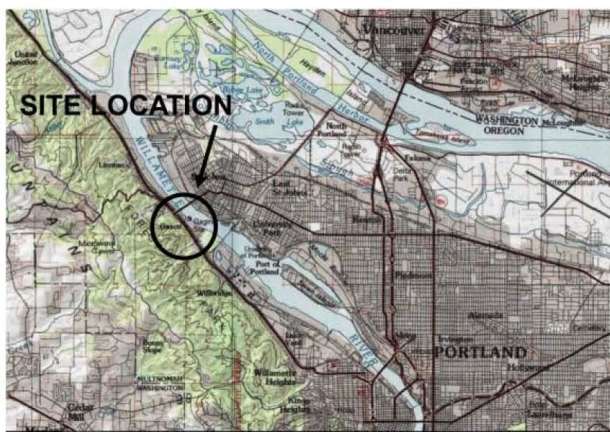
The properties listed below are identified for Koppers Inc. for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID number	Street Address	County Tax Parcel ID	Notes
123	7540 NW St Helens Road, Portland, OR	R961120420 (R324113) R961121300 (R324171) R961121120 (R324159) R961121290 (R324170) R961121310 (R324172) R961121130 (R324160) R961121230 (R324165) R961130540 (R502592) R961130410 (R324213)	[See attached map]

Koppers Inc. Released Facilities:

1. Gasco dock – River Mile 6.3
2. NPDES Permit No. 100419, replaced by NPDES Permit No. 101003 and then NPDES Permit No. 101642; Outfall No. 001, River Mile 6.5.

See attached map at ● for 1 and 2.

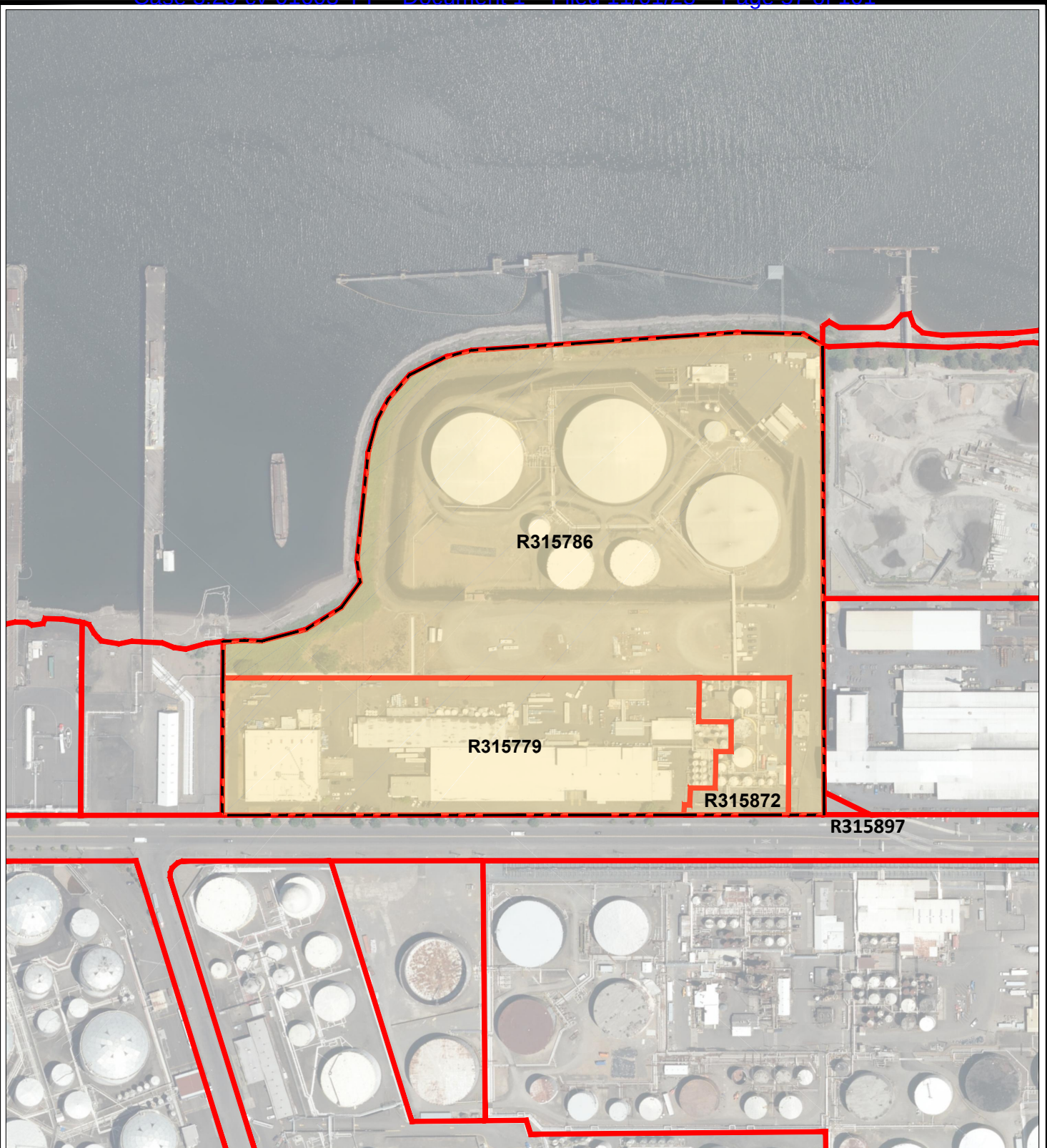


Appendix A – McCall Oil

The properties listed below are identified for McCall Oil and Chemical Corporation, McCall Oil Real Estate Company LLC, Morec Front LLC, GWC Properties, LLC, GWC Front, LLC, and Tanker Basin LLC, for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID number	Street Address	Assessor's Parcel Number	Alt Account Number	Notes
136	5480 NW FRONT AVE	R315786	R941180260	See Figure 1
136	5540-5740 NW FRONT AVE	R315779	R941180170	See Figure 1
136	5700 NW FRONT AVE	R315872	R941190960	See Figure 1
136	5480 NW FRONT AVE	R315897	R941191270	See Figure 1

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Source: Tax District and Map Image Viewer <http://multco.maps.arcgis.com>

LEGEND:

- Approximate Parcel Boundary
- - - - - Approximate Property Boundary

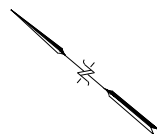


Figure 1

**PARCEL MAP
McCALL OIL AND
CHEMICAL CORPORATION
PORTLAND, OREGON**



Appendix A – MMGL LLC

The properties listed below are identified for MMGL LLC for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID number	Street Address	County Tax Parcel ID
51	10350 N. Time Oil Road	R971350650, R971350620, R971350630, R971350180, R971350310, R971350600, R971350380
52	9125 N. Time Oil Road, 9449 N. Burgard Way, 9945 N. Burgard Way, 10400 N. Burgard Way, 12005 N. Burgard Road	R971350570, R971350550, R971350760, R971350560, R118300300, R118300010, R118300900, R118300700, R118300800, R971350571
55	9333 N. Time Oil Road	R118301000
56	9449 N. Burgard Way	R118300400, R118300500, R118300600
60	9040 N. Burgard Way	R971350740
61	12005 N. Burgard Road	R971350710, R118300200
109	8940/8970 N. Bradford Street	R425807870
141	6529 NW Front Ave.	R961130330
158	5851 N. Lagoon Ave.	R941170730, R941170890
186	4250 NW Front Ave. (former address of relevant portion of Site 186, all of which is now addressed as 4700 NW Front Ave.)	R941200570, R941191240, R941200500, R941191190
203	3200-3340 NW Yeon Ave., 3340-3342 NW 26 th Ave.	R649701500, R941291430, R649701480, R649701460, R934690010, R941280990, R941280950
204	3721 NW Front Ave.	R941200220
205	3641/3683 NW Front Ave.	R941200980
209	3333 NW Front Ave.	R941280470
near 227	2262 NW Nicolai Street	Formerly R766002340, now occupied by a portion of U.S. Route 30
329	1415 NW 12 th Ave.	R180221780
533	3033 NW Yeon Ave.	R941290860
546	4319 NW Yeon Ave.	R649704660
547	4110 NW St. Helens Road/4285 NW Yeon Ave.	R941190130
565	4325-4347 NW Yeon Ave.	R649704640

Site ID number	Street Address	County Tax Parcel ID
589	3720 NW Yeon Ave.	R941291670
590	3055-3061 NW Yeon Ave.	R941290960
607	12005 N. Burgard Road	R118300100
608	4931-5043 NW Front Ave.	R941190500
609	2531-2535 NW 28 th Ave.	R414900490
648	2000/2019 NW Wilson Street	R766000300
649	2306 NW Reed Street	R215300840
650	2321-2337 NW York Street	R215300810, R215300890
651	3738 NW Yeon Ave.	R941290800

Appendix A – Northwest Pipe Company

The properties listed below are identified for NORTHWEST PIPE COMPANY fka NORTHWEST PIPE & CASING COMPANY and NORTHWEST PIPE AND CASING COMPANY (“NW Pipe”) for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Street Address	County Tax Parcel ID	Notes
12005 N Burgard Rd	Alt. Acct Nos. R971350469; R971350460	Main Site ID Nos. are 62 and #607 See attached map – Areas B through I
9040 N. Burgard Way	Alt. Account No. R971350740	See attached map – Area R
12005 N Burgard Rd	Alt. Account No. R971350340	Main Site ID Nos. are 62 and #607 See attached map – Area A
12005 N Burgard Rd	Assoc. w/ Alt. Acct. No. R118300100	See attached map – Area K
12005 N Burgard Rd	Assoc. w/ Alt. Acct. No. R118300800	See attached map – Area L
12005 N Burgard Rd	Assoc. w/ Alt. Acct. No. R118300700	See attached map – Area M
12005 N Burgard Rd	Assoc. w/ Alt. Acct No. R118300100	See attached map – Area N
12005 N Burgard Rd	Assoc. w/ Alt. Acct No. R118300200	See attached map – Area O
12005 N Burgard Rd	Assoc. w/ Alt. Acct No. R118300300	See attached map – Area P
12005 N Burgard Rd	Assoc. w/ Alt. Acct No. R118300200	See attached map – Area Q
12005 N Burgard Rd	Assoc. w/ Alt. Acct No. R118300100	See attached map – Far west portion of Area K
12005 N Burgard Rd	Assoc. w/ Alt. Acct No. R118300100	See attached map – Area J
12005 N Burgard Rd	Assoc. w/ Alt. Acct No. R971350710 and R118300200	See attached map – Area S
12005 N Burgard Rd	Assoc. w/ Alt. Acct No. R118300200	See attached map – Area T
9125 N Time Oil Rd	Assoc. w/ Alt. Acct Nos. R118300700, R118300800	See attached map –Portion of southern Areas M and L

Appendix A - PacifiCorp**PacifiCorp Currently Owned/Operated Properties**Properties associated with specific tax parcels

Property Description	Address	Property ID	State ID	County Tax Alternate Account No.
Albina Substation (Blocks 71, 81 and 82, Albina)	Between N. Lewis and N. Harding Avenue, and between N. River and N. Railroad Streets	R102677 (Block 71)	1N1E27CB - 01000	R009616420
		R102695 (Block 81)	1N1E27CB - 01200	R009617190
		R102696 (Block 82)	1N1E27CB - 01100	R009617290
Knott Substation (Portions of Blocks 26 & 27, Albina)	West of NE Rodney Ave., between NE Russell St. and NE Knott St. (91 NE Russell St.)	R102427	1N1E27AD - 16700	R009610170
		R102428	1N1E27AD - 16600	R009610180
		R102429	1N1E27AD - 16800	R009610190
		R102430	1N1E27AD - 16500	R009610200
		R102431	1N1E27AD - 16400	R009610210
		R102432	1N1E27AD - 16300	R009610220
		R102433	1N1E27AD - 16200	R009610230
		R102434	1N1E27AD - 16100	R009610240
		R102435	1N1E27AD - 16000	R009610250
		R102437	1N1E27AD - 15800	R009610360

Property Description	Address	Property ID	State ID	County Tax Alternate Account No.
Knott Substation (Portions of Blocks 26 & 27, Albina)	West of NE Rodney Ave., between NE Russell St. and NE Knott St. (91 NE Russell St.)	R102438	1N1E27AD - 15600	R009610450
		R102439	1N1E27AD - 15700	R009610460
Lincoln Substation, South Waterfront Extension	2477 S Moody Ave.	R273075 (property) / R273076 (easement)	1S1E03CD - 00901 / 1S1E03CD - 00901-A1	R779900360 / R779900361

Other Properties

Transmission and Distribution System, Albina, Lincoln and Downtown Districts

Facilities and service areas identified in attached Exhibits A-1 and A-2, including poles, towers, transmission and distribution lines, submarine cable crossings and transformers.

PacifiCorp Formerly Owned/Operated Properties

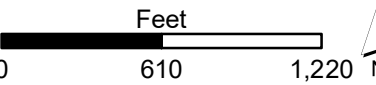
Property Description	Address	Property ID	State ID	County Tax Alternate Account No.
Block 69, Albina, Lots 7 & 8	2170 – 2182 N. Lewis Ave.	R102675	1N1E27CA - 06000	R009616320
Block 78, Albina	1303 S/ N River St.	R102691	1N1E27CB - 02600	R009616890
	1303 WI/ N River St.	R102692	1N1E27CB - 02500	R009616900
Block 79, Albina	2223 N. Randolph Ave.	R102693	1N1E27CB - 01400	R009616990
Block 80, Albina	2204 N. Randolph Ave.	R102694	1N1E27CB - 01300	R009617100
Block 83, Albina	2110 N. Lewis Ave.	R102697	1N1E27CA - 06400	R009617390
		R532607	1N1E27CA - 06401	R009617400
		N. Tillamook St. Ramp (no Tax Parcel)		
Former Lincoln Station (PacifiCorp ownership areas as depicted in attached Exhibit A-3)	Foot of SW Lincoln Street	R238252	1S1E03CD - 00300	R649742170
		R238253	1S1E03CD - 00200	R649742180
		R246187 (Portion)	1S1E03CA - 01000	R667709440
		R273071	1S1E03CD - 00500	R779900200

Property Description	Address	Property ID	State ID	County Tax Alternate Account No.
Former Lincoln Station (PacifiCorp ownership areas as depicted in attached Exhibit A-3)	Foot of SW Lincoln Street	R273073	1S1E03CD - 00800	R779900300
		R273074	1S1E03CD - 00900	R779900350
		R273075	1S1E03CD - 00901	R779900360
		R273076	1S1E03CD - 00901-A1	R779900361
		R273077 (Portion)	1S1E03CD - 01000	R779900400
		R326736 (Portion)	1S1E03CA - 01200	R991030290
		R487357	1S1E03CD - 00102	R649795140
		R592350	1S1E03CD - 90000	R799400010

PacifiCorp
Exhibit A-2

Lincoln and Downtown District
Transmission and Distribution
System Facilities

- + River Mile
- Facility Points**
 - ▲ Pad Mounted Transformers
 - ▣ Underground Transformers
 - Transmission Structure
 - Distribution Primary Lines
 - Distribution Secondary Lines
- Transmission Lines**
 - PacifiCorp Owned
- Service Areas**
 - Lincoln - PacifiCorp (Parcel B)
 - Downtown Core - Shared (Parcel D)



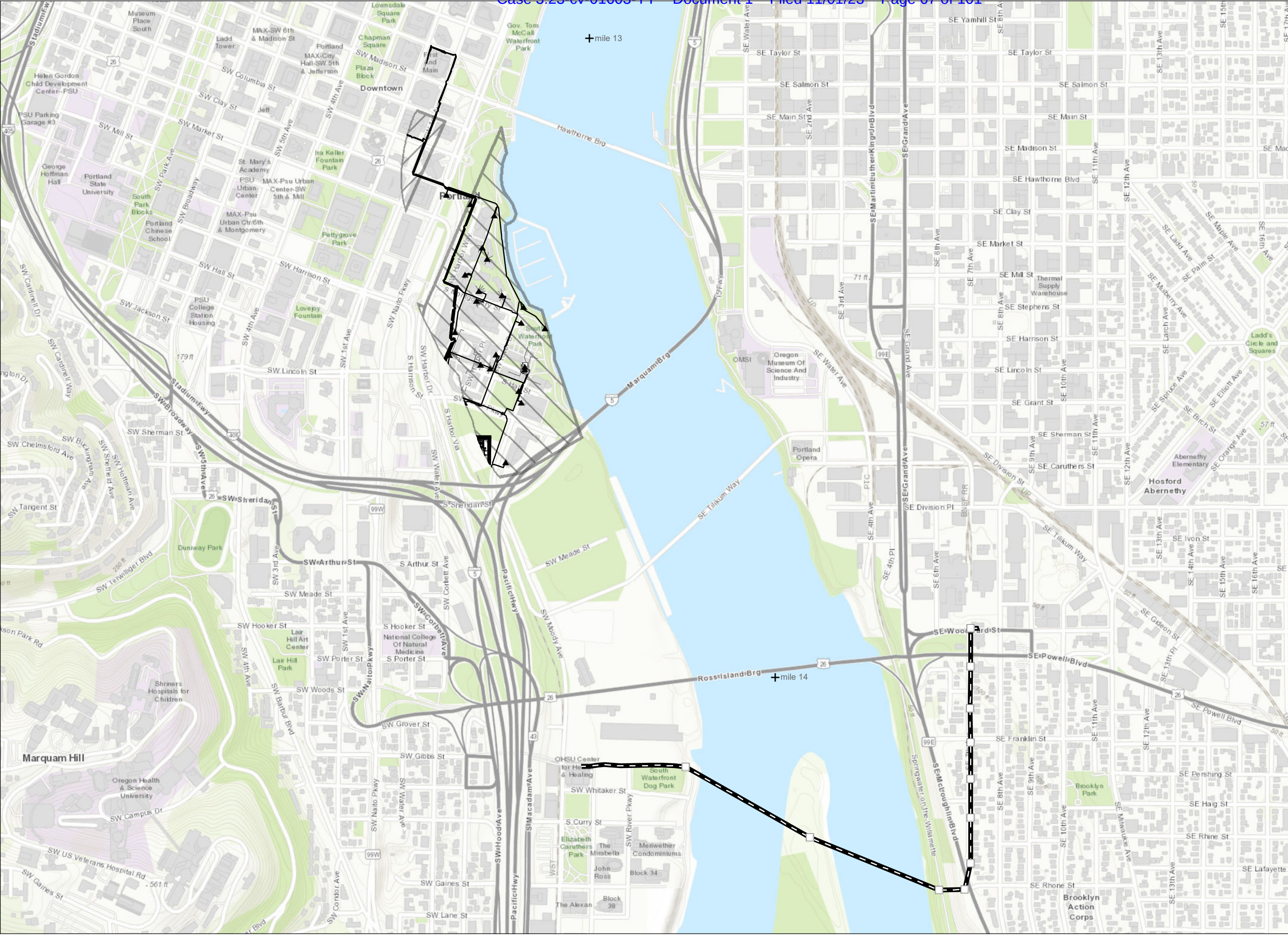
PACIFICORP

GIS SUPPORT SERVICES
Solutions Group
gisdept@pacifiCorp.com

Data is projected in UTM Zone 10, NAD83, meters.

PacifiCorp makes no representations or warranties as to the accuracy, completeness or fitness for a particular purpose with respect to the information contained in this map. PacifiCorp shall have no responsibility or liability to any person or entity resulting from the use of any information furnished in this map.

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Appendix A – Port of Portland

The properties listed below are identified for Port of Portland for purposes of this Complaint, along with: (a) any docks, dry docks, wharves, berths, or other structures (or equipment on them), that extended or extend from any of the listed properties into or over the waters of the Willamette River; and (b) any immediately adjacent areas formerly owned by the Port that became roads, streets, railroads, or rights-of-way (that may or may not have tax parcel numbers). Properties listed below are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where applicable, the "Formerly Known As" column identifies former parcel numbers that have cancelled into the listed current parcel number or provides other clarifying information. Where available, the Site ID number and street address are also listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID ¹	Mult Co Alt Act#	Address ²	Formerly Known As ³
8	R708881588	15660 N LOMBARD ST	
8	R708881940	15660 N LOMBARD ST	R708882420; R708882440, R708882430
8	R708881600	15660 N LOMBARD ST	
8	R708882410	15660 N LOMBARD ST	
8	R708881908	15660 N LOMBARD ST	
8	R708881890	15660 N LOMBARD ST	
8	R708881960	15660 N LOMBARD ST	R708881880; R708881950; R708881930
8	R708882620	15660 N LOMBARD ST	
8	R708882850	15660 N LOMBARD ST	
8	R708881910	15660 N LOMBARD ST	
8	R708880036	15660 N LOMBARD ST	
8	R708881584	15660 N LOMBARD ST	R708881582
8	R708892700	15660 N LOMBARD ST	R708880020
8	R708881870	15660 N LOMBARD ST	
8	R708881900	15660 N LOMBARD ST	
8	R708881590	15660 N LOMBARD ST	
8	R708882200	15660 N LOMBARD ST	
13	R649774290	14400 N RIVERGATE BLVD	
17	R971260240	14003 N RIVERGATE BLVD	
17	R971260310	14003 N RIVERGATE BLVD	
18	R971260260	14025 N RIVERGATE BLVD	
21	R971260190	13939 N RIVERGATE BLVD	
22	R708882760	SWC/ RAMSEY & N RIVERGATE BLVD	
22	R708883810	9639 N RIVERGATE BLVD	
22	R708887010	13333 WI/ N RIVERGATE BLVD	

Site ID ¹	Mult Co Alt Act#	Address ²	Formerly Known As ³
22	R708882700	9699 S/ N RIVERGATE BLVD	
22	R708882770	LEVY CODE 201	
22	R708883800	9619 N RIVERGATE BLVD	
22	R708882666	LEVY CODE 201	
22	R708887100	13035 N RIVERGATE BLVD	
22	R708886700	LEVY CODE 201	
22	R708887220	N TIME OIL RD	
22	R708886500	LEVY CODE 201	
22	R708886510	LEVY CODE 201	
22	R708882680	LEVY CODE 201	
22	R708886600	13333 N RIVERGATE BLVD	
22	R971260030	13333 N RIVERGATE BLVD	
22	R708882800	13333 N RIVERGATE BLVD	
22	R708880040	13333 N RIVERGATE BLVD	
22	R359500020	13333 N RIVERGATE BLVD	
22	R708887000	13333 N RIVERGATE BLVD	
22	R708883840	13333 N RIVERGATE BLVD	
22	R708883830	9639 N RIVERGATE BLVD	
22	R708890250	9333 N RIVERGATE BLVD	
22	R708884120	LEVY CODE 201	
22	R971260340	LEVY CODE 201	
22	R708882740	W END/ N RAMSEY BLVD	
22	R359500100	9345 N HARBORGATE ST	
24	R971260200	13940 N RIVERGATE BLVD	
24	R708884300	9715 N RAMSEY BLVD	R971260210
47	R971350100	LEVY CODE 201	
48	R708887200	13035 N RIVERGATE BLVD	
71	R971350540	11040 N LOMBARD ST/TERMINAL 4	
71	R971350250	11041 N LOMBARD ST/TERMINAL 4	
71	R971350240	11040 N LOMBARD ST/LEVY CODE 201	
71	R961021100	11040 N LOMBARD ST	R961021280, R961021350, R961021200, R961021360
71	R961020410	11041 N LOMBARD ST/TERMINAL 4	
71	R961021030	11042 N LOMBARD ST/TERMINAL 4	
71	R961020960	11044 N LOMBARD ST/TERMINAL 4	

Site ID ¹	Mult Co Alt Act#	Address ²	Formerly Known As ³
71	R961020910	11045 N LOMBARD ST/TERMINAL 4	
71	R961021260	11040 N LOMBARD ST	R961021270
71	R961021370	11040 N LOMBARD ST	
71	R961021230	11040 N LOMBARD ST	
71	R961021240	11040 N LOMBARD ST	
71	R961020420	11040 N LOMBARD ST/TERMINAL 4	
71	R961021250	11040 WI/ N LOMBARD ST	
73	R961020390	11020 N LOMBARD ST	
73	R961021330	11020 N LOMBARD ST	R961021340
73	R961020930	N BRADFORD ST	
73	R961021020	TERMINAL 4	
73	R961021190	LEVY CODE 201	
73	R961020630	N BRADFORD ST	
73	R961110340	N BRADFORD ST	
73	R961110450	11020 N LOMBARD ST	
73	R961021130	10400 N LOMBARD ST	
108	R961110010	8940 N BRADFORD ST	
108	R961110360	8940 N BRADFORD ST	
127	R961120390	S/ N PIERCE AVE (FORMER POP PROPERTY)	
127	R961120410	SEC/ RICHMOND & N BRADFORD ST (METRO)	
127	R961120990	N VAN BUREN AVE (METRO)	
127	R961121240	N VAN BUREN AVE (METRO)	
127	R961121420	S/ N WILLAMETTE BLVD	
127	R739100180	SWC/ BRADFORD & N RICHMOND AVE (METRO)	
133	R941180200	6080 WI/ NW FRONT AVE	R941180060
136	R941190960	5700 NW FRONT AVE	
136	R941180170	5724-5740 NW FRONT AVE	
136	R941191270	5480 WI/ NW FRONT AVE	
136	R941180260	5480 WI/ NW FRONT AVE	
143	R941180050	5533 WI/ NW DOANE AVE	
144	R941180040	5528 NW DOANE AVE	
157	R941180390	5555 N CHANNEL AVE	
157	R649840290	5555 N CHANNEL AVE	R649831524
157	R941201320	5555 N CHANNEL AVE	

Site ID ¹	Mult Co Alt Act#	Address ²	Formerly Known As ³
160	R649831522	5225 N CHANNEL AVE	R649831526
160	R649831527	5225 N CHANNEL AVE	
160	R941201120	N CHANNEL AVE	
160	R649831508	N CHANNEL AVE	
160	R941201130	N CHANNEL AVE	
160	R941200620	4855 N LAGOON AVE	
160	R941210030	SE COR/ BASIN & N WYGANT ST	
160	R814680150	N CHANNEL AVE	R649831500 (See Footnote 13)
160	R941200950	4660 N CHANNEL AVE / 4085 N ANCHOR ST	R941201060, R941201050
160	R941210820	4703-4715 N LAGOON AVE	R941200900, R941211050
160	R941201300	4703-4715 W/ N LAGOON AVE	
160	R814680200	N CHANNEL AVE	R649831494, R814680400, R814680450
160	R941210830	NW COR/ BASIN & N GOING ST	
160	R649735970	N CHANNEL AVE / 4344 N/ N PORT CENTER WAY	
160	R649704100	3110 N GOING ST	
160	R814680404	4435-4747 N CHANNEL AVE	R649831511; R814680300; R814680354, R649831506, R649831514, R649831504, R649831502
160	R814680204	4555 N CHANNEL AVE	R649831513; R814680354
160	R814680050	4435-4747 N CHANNEL AVE	R649831516, R649831510, R649831512
160	R941171190	S SIDE/ N DOLPHIN ST	R941201240, R941201270
160	R941201110	N CHANNEL AVE	
163	R941200890	5405 N LAGOON AVE	
164	R025800060	7007 S/ N CUTTER CIR	
164	R025800080	7008 S/ N CUTTER CIR	
164	R941170880	6936 N FATHOM ST	
164	R941171360	6936 WI/ N FATHOM ST	
165	R649840324	5420 N LAGOON AVE	
165	R649840300	5420 N LAGOON AVE	
171	R649755370	5036 N LAGOON AVE	
175	R941200680	4859 N LAGOON AVE	
175	R941200720	5001 N LAGOON AVE	
181	R941191230	5034 WI/ NW FRONT AVE	
182	R649741610	5034 NW FRONT AVE	
182	R649741630	4950 NW FRONT AVE	

Site ID ¹	Mult Co Alt Act#	Address ²	Formerly Known As ³
186	R941200570	4700 WI/ NW FRONT AVE	
188	R941200650	3838 NW FRONT AVE	
191	R941180140	5501 NW FRONT AVE	
191	R941190640	5501 NW FRONT AVE	
195	R649831490	4099 N PORT CENTER WAY	
197	R941190600	LEVY CODE 001	
207	R941291980	3445-3455 NW FRONT AVE	
218	R941201280	3556 NW FRONT AVE	
218	R941280500	3556 WI/ NW FRONT AVE	
218	R941280820	3556 WI/ NW FRONT AVE / 2800 N/ NW FRONT AVE	
218	R941280710	3556 WI/ NW FRONT AVE	
218	R941292160	NW FRONT AVE	
218	R941280650	3556 WI/ NW FRONT AVE	
218	R941280630	3060-3556 NW FRONT AVE	
218	R941280440	3556 WI/ NW FRONT AVE	
218	R941280590	NW SHERLOCK AVE	
222	R766004790	2400 NW FRONT AVE	
231	R941170920	6767 N BASIN AVE	
231	R941170940	6735 N BASIN AVE	
232	R941171010	6211 N ENSIGN ST	
234	R941171120	6208 S/ N ENSIGN ST	
234	R941171030	6208 N ENSIGN ST	
236	R941170520	6147 N BASIN AVE	
236	R941171290	6135 N BASIN AVE	
237	R941170590	5949 N BASIN AVE	See Footnote 4
238	R941171260	5617-5885 N BASIN AVE	
248	R941170560	5926-5938 N BASIN AVE	R941170550
249	R941170540	5820 N BASIN AVE	
250	R941160200	5500 N BASIN AVE	
263	R605604000	6845 N CUTTER CIR	
303	R708820010	1700 NW RIVERSCAPE ST	
303	R637100010	1830 NW RIVERSCAPE DR	
303	R768100010	NW RIVERSCAPE ST	
303	R708970150	NW FRONT AVE / 1850 NW FRONT AVE	
303	R708970010	NW FRONT AVE	
303	R708970270	NW 16TH AVE	See Footnote 5
303	R708970040	NW 16TH AVE	

Site ID ¹	Mult Co Alt Act#	Address ²	Formerly Known As ³
303	R708970050	NW 16TH AVE	
303	R708970110	E/ NW FRONT AVE	
303	R708970100	E/ NW FRONT AVE	
303	R708970060	NW RIVERSCAPE ST	
303	R708970080	NW RIVERSCAPE ST	
303	R708970500	NWC/ 18TH & NW FRONT AVE / 2220 NW FRONT AVE	
303	R708970550	NW FRONT AVE / 2130 NW FRONT AVE	
303	R708970600	NW FRONT AVE / 2080 NW FRONT AVE	
303	R708970650	NW FRONT AVE / 2010 NW FRONT AVE	R708970700
303	R766004290	PART/ TERMINAL 1 SOUTH	
303	R708970020	1648 NW RIVERSCAPE ST / NW 16TH AVE	
303	R708970350	1648 NW RIVERSCAPE ST	See Footnote 6
303	R708970400	1648 NW RIVERSCAPE ST	See Footnote 7
303	R708970070	1648 NW RIVERSCAPE ST	
303	R708970250	1648 NW RIVERSCAPE ST	See Footnote 8
303	R708970450	1648 NW RIVERSCAPE ST	See Footnote 9
303	R708970090	1648 NW RIVERSCAPE ST	See Footnote 10
303	R708970300	1648 NW RIVERSCAPE ST	See Footnote 11
309	R180235990	1030 NW NAITO PKWY	
596	R941160220	5400 N/ N EMERSON ST	
596	R941160230	5400 N/ N EMERSON ST	
596	R941210560	5400 N BASIN AVE	
596	R941160210	5400 N/ N BASIN AVE	
596	R941211100	5400 WI/ N BASIN AVE	
596	R941200840	5400 WI/ N BASIN AVE	
597	R941201180	5161 WI/ N LAGOON AVE	
597	R941200910	5161 WI/ N LAGOON AVE	
597	R941200760	5161 N LAGOON AVE	
597	R941200920	5160 N LAGOON AVE	
76L	R941210510	LEVY CODE 710	
76L	R649729810	N PORT CENTER WAY	
277L	R941280920	LEVY CODE 201	
None	R941200060	3710 NW FRONT AVE	P120035701
None	R605600020	S SIDE/ N WILLAMETTE BLVD	R025800021

Site ID ¹	Mult Co Alt Act#	Address ²	Formerly Known As ³
None	R649680490	N CUTTER CIR	R025800020, R025800040 (See Footnote 12)
None	R359500050	9310 N HARBORGATE ST	
None	R359500150	9333 N HARBORGATE ST	
None	R359500200	9442 N RAMSEY BLVD	
None	R605600080	5910 N CUTTER CIR	
None	R605600160	6000-6020 N CUTTER CIR	
None	R605600340	6032-6220 N CUTTER CIR	
None	R605600390	6330 N CUTTER CIR	
None	R605600400	6712 N CUTTER CIR	
None	R605601980	6121 N CUTTER CIR	
None	R605602000	6421 N CUTTER CIR	
None	R605602020	6235 N CUTTER CIR	
None	R605602021	6235 WI/ N CUTTER CIR	
None	R605602060	3620 N LEVERMAN ST	
None	R605602200	6400 N CUTTER CIR	
None	R605603500	6800-6840 N CUTTER CIR	
None	R605604700	6447 N CUTTER CIR	
None	R637101610	BLANK	
None	R649732010	5909 N CUTTER CIR	
None	R649732020	5937 N CUTTER CIR	
None	R649735960	4344 N PORT CENTER WAY	
None	R649744600	2435 NW FRONT AVE	
None	R649744630	2303 NW FRONT AVE	
None	R649746970	3449-3627 N ANCHOR ST	
None	R649746980	3449-3627 WI/ N ANCHOR ST	
None	R649774295	14400 WI/ N RIVERGATE BLVD	
None	R649774300	14141 N RIVERGATE BLVD	
None	R649845770	5018 N CHANNEL AVE BLDG #1	
None	R649845780	5016 N CHANNEL AVE	
None	R649867690	3737 N EMERSON ST	
None	R649867700	N BASIN AVE	
None	R708881120	9200 WI/ N RAMSEY BLVD	
None	R708881140	9200 N RAMSEY BLVD	
None	R708881594	15840 WI/ N SIMMONS RD	
None	R708881596	LEVY CODE 393	

Site ID ¹	Mult Co Alt Act#	Address ²	Formerly Known As ³
None	R708882240	15831 N SIMMONS RD	
None	R708882260	15840 WI/ N SIMMONS RD	
None	R708882300	16120 N SIMMONS RD	
None	R708882870	15840 N SIMMONS RD	
None	R708883700	9211 N HARBORGATE ST	
None	R708883900	10001 N RIVERGATE BLVD	
None	R708884100	9625 N RAMSEY BLVD	
None	R708890050	9222 N HARBORGATE ST	
None	R708890150	9243 N RIVERGATE BLVD	
None	R708890170	13225 N LOMBARD ST	
None	R708892300	14819 WI/ N LOMBARD ST	
None	R708892400	14819 N LOMBARD ST	
None	R708892600	15011 N LOMBARD ST	
None	R766003220	NWC/ 21ST & NW FRONT AVE	
None	R882434320	BLANK	
None	R941170570	5550 N BASIN AVE	
None	R941170580	6100 N BASIN AVE	
None	R941170610	6220 N BASIN AVE	
None	R941170620	5555 N LAGOON AVE	
None	R941170680	6290 N BASIN AVE	
None	R941170730	5851 WI/ N LAGOON AVE	
None	R941170740	6310 N BASIN AVE	
None	R941170830	5565 N DOLPHIN ST	
None	R941170860	6457 N BASIN AVE	
None	R941170870	6650 N ENSIGN ST	
None	R941170890	5851 WI/ N LAGOON AVE	
None	R941170900	6520 N BASIN AVE	
None	R941170910	6707 N BASIN AVE	
None	R941170930	6645 N ENSIGN ST	
None	R941170970	6650-6720 N BASIN AVE	
None	R941171000	NWC/ BASIN & N FATHOM ST	
None	R941171070	6870-6874 N FATHOM ST	
None	R941171080	5550 WI/ N BASIN AVE	
None	R941171130	6330-6340 N BASIN AVE	
None	R941171150	S/ N WILLAMETTE BLVD	
None	R941171200	6335 N BASIN AVE	
None	R941171210	6707 WI/ N BASIN AVE	

Site ID ¹	Mult Co Alt Act#	Address ²	Formerly Known As ³
None	R941171220	6840 N FATHOM ST	
None	R941171230	6125-6235 N BASIN AVE	
None	R941190290	4322-4338 NW YEON AVE	
None	R941200220	3721 NW FRONT AVE	
None	R941200700	3838 N BALLAST ST	
None	R941200730	4750 N CHANNEL AVE	
None	R941200740	4865 N LAGOON AVE	
None	R941200750	3919 N BALLAST ST	
None	R941200780	5020 N CHANNEL AVE	
None	R941200790	5061 N LAGOON AVE	
None	R941200800	5411 N LAGOON AVE	
None	R941200820	5051 N LAGOON AVE	
None	R941200830	5300-5350 N CHANNEL AVE	R941200860
None	R941200850	4800 N CHANNEL AVE	
None	R941200960	4325 N COMMERCE ST	
None	R941200970	5140 N CHANNEL AVE	
None	R941200980	3641-3683 NW FRONT AVE	
None	R941210850	4810 N BASIN AVE	
None	R941210870	3002-3014 N WYGANT ST	
None	R941210980	4810 WI/ N BASIN AVE	
None	R941211000	4730 N LAGOON AVE	
None	R941211010	4711 N BASIN AVE	
None	R941211020	4711 WI/ N BASIN AVE	
None	R941211110	4805-4825 N BASIN AVE	
None	R941280320	2901 NW FRONT AVE	
None	R941280930	3045-3065 WI/ NW FRONT AVE	
None	R941290570	3501-3599 NW YEON AVE	
None	R941290830	3551 NW FRONT AVE	
None	R941291070	3150 NW 31ST AVE	
None	R941291990	NW 26TH DRIVE	See Footnote 14
None	R961021140	10400 N LOMBARD ST	
None	R961021210	6921-7011 N ROBERTS AVE	
None	R971230030	LEVY CODE 393	
None	R971230050	LEVY CODE 393	
None	R941190450	4927 NW FRONT AVE	R941200930
None	R605600030	W SIDE/ N WILLAMETTE BLVD	

Site ID ¹	Mult Co Alt Act#	Address ²	Formerly Known As ³
None	R605600040	S SIDE/ N WILLAMETTE BLVD	
None	R605600070	6800 S/ N CUTTER CIR	
None	R605600100	N CUTTER CIR	
None	R605600120	N BASIN AVE	
None	R605600200	N CUTTER CIR	
None	R605600380	W SIDE/ N WILLAMETTE BLVD	
None	R605602210	W SIDE/ N LEVERMAN ST	
None	R941171100	NEC/ EMERSON & N BASIN AVE	
None	R941171110	6290 NE/ N BASIN AVE	
None	R941171140	6645 E/ N ENSIGN ST	
None	R941210430	5239 N/ N EMERSON DR	
FOOTNOTES			
1	Site ID: Site ID number from Trustees' Portland Harbor Allocation Site List.		
2	Address: From Port GIS database and/or Multnomah Co tax lot database.		
3	"Formerly Known As" column identifies former parcel numbers that have cancelled into the listed current parcel number		
4	R941170590; This lot merged into "Partition Plat 2016-10" in 2016		
5	R708970270; This lot merged into "Shoreline Condominiums" in 2006		
6	R708970350; This lot merged into "Shoreline Condominiums" in 2008		
7	R708970400; This lot merged into "Riverfront Place Condominium" in 2011		
8	R708970250; This lot merged into "Shoreline Condominiums Stage 2" in 2006		
9	R708970450; This lot merged into "Pacifica at Riverscape Condominiums" in 2008		
10	R708970090; This lot merged into "Pacifica at Riverscape Condominiums in 2008		
11	R708970300; This lot merged into "Shoreline Condominiums Stage 3" in 2007		
12	R025800020; This lot merged into "Partition Plat 2017-13" in 2017		
13	R649831500; This lot merged into "Swan Island Port Center Campus" in 2019		
14	R941291990; This lot merged into the north end of NW 26th Drive (street)		

Appendix A: Property of Portland General Electric Company (PGE) and identified spills or releases

This Appendix A, including Exhibits A-1, A-2 and A-3, contains the descriptions of real and personal property and identified spills and releases and is intended to comprehensively describe all such property and spills or releases included within Appendix A. PGE's distribution network is found throughout the PGE Distribution Network Area Boundary as delineated by the line on the maps provided in Exhibits A-1 and A-2. The distribution network includes but is not limited to poles, towers, transmission and distribution lines, substations, submerged or underground cables and lines, transformers, capacitors, switches, reclosers and vaults, that together distribute or have distributed power to PGE customers. PGE constructed, installed, or acquired the various portions of the distribution network at various times including portions acquired, constructed, and installed by PGE predecessor companies prior to 1930 and by PGE after 1930; and portions acquired from Pacific Power & Light in a territory swap.

Part 1: PGE Current and Historically-Owned or Operated Properties

The following properties and facilities are currently or previously owned or operated by PGE and are included within Appendix A. The properties specified include all facilities, equipment and service areas located within the properties, including but not limited to, any poles, towers, transmission and distribution lines, substations, submerged or underground cables and lines, transformers, capacitors, switches, reclosers and vaults, at these locations, that together distribute power to PGE customers.

<u>Property Description¹</u>	<u>Portland Harbor Trustee Designated Site ID</u>	<u>Address</u>	<u>Property ID</u>	<u>State ID</u>	<u>Multnomah County Alternate Tax No.</u>
Harborton Property and Substation	45	12500 NW Marina Way And near 12430 NW St. Helens Rd.	R325467 R325472 R325470 R504043 R325468 R325474	2N1W3400100 2N1W3400300 2N1W3401000 2N1W3400800 2N1W3401100 2N1W3401800	R971340100 R971340180 R971340160 R971340410 R971340130 R971340200
Rivergate Substation and adjacent historic property	47	8920 N. Time Oil Rd. 8849 N. Burgard Way 12299 N. Burgard Rd.	R325485 R325504 R325526 R325506 R325530	2N1W35B01700 2N1W35A00800 2N1W35D00200 2N1W35A00900 2N1W35D00100	R971350100 R971350480 R971350730 R971350520 R971350750
Wacker Substation	125	7200 NW Front Ave.	R324183 R324219	1N1W1301200 1N1W13A00100	R961130010 R961130480

¹ Properties are described by name, address and other identifying information, if available. Property addresses, lot lines, IDs and tax numbers may have changed over time. Property Id, State ID and Alternate Tax Numbers are provided if associated with the property.

Crawford St. Corporation Site (historic property (v))	126	8524 N. Crawford St.	R263881 R263877 R263876 R263878 R263880 R263874 R263875	1N1W12BD05500 1N1W12BD05900 1N1W12BD05800 1N1W12BD05700 1N1W12BD05600 1N1W12CA00200 1N1W12CA00300	R739101320 R739100920 R739100840 R739101000 R739101160 R739100250 R739100380
Pennwalt Substation (historical ownership)	131	6400 NW Front Ave.	R553604 R553602 R553603 R553605 R553606 R553814 R531501	1N1W1300204 1N1W1300207 1N1W1300203 1N1W1300205 1N1W1300206 1N1W1300202 1N1W1300201	R617400100 R617400010 R617400050 R617400150 R617400200 R961130590 R961130580
Willbridge Substation	148	6215 NW St. Helens Rd. 6333 NW St. Helens Rd. 6411 NW 64 th Ave.	R702526 R308300 R308301 R308311 R308310 R308302 R308291 R308303 R308292 R308299 R308295 R308297 R308294	1N1W13DB01401 1N1W13DB02200 1N1W13DB02300 1N1W13DB01900 1N1W13DB01800 1N1W13DB02400 1N1W13DB02500 1N1W13DB03200 1N1W13DB02600 1N1W13DB03100 1N1W13DC01500 1N1W13DB02900 1N1W13DB02700	R64991 R915502150 R915502250 R915502750 R915502710 R915502300 R915501800 R915502310 R915501830 R915502130 R915501890 R915502010 R915501870
Station N (historical ownership)	155	5828 N. Van Houten Pl.	R315775 R248488	1N1E1800100 1N1E1800300	R941180100 R669907720
Zidell/Emery (historic property (ix))	181	4950, 5034, and 5200 NW Front	R315893 R238223 R315838 R238220 R238218	1N1E19A00100 1N1E19A00900 1N1E19A01500 1N1E19A01100 1N1E19A01000	R941191230 R649741630 R941190540 R649741620 R649741610
Yeon Property (historical ownership)	193	Near 4400 Block NW St. Helens Rd. southwest of junction of NW Yeon Ave. and NW St. Helens Rd.	R315857 R315880	1N1E19CA00100 1N1E19CA00200	R941190770 R941191080

Station E (historical ownership)	220, 221, 229	2700 NW Front Ave. 2635 NW Front Ave. 2101 NW Reed St.	R316362 R316311 R269766 R269767 R269763 R269760 R269761 R269762	1N1E28B00600 1N1E28B00800 1N1E28BD00500 1N1E28BD00400 1N1E28CA03100 1N1E28CA03200 1N1E28CA03400 1N1E28CA03500	R941280900 R941280300 R766003080 R766003120 R766002840 R766002720 R766002750 R766002800
Swan Island Substation	250	5500 N. Basin Rd.	R315598	1N1E16CC01900	R941160200
De Wolf Properties LLC (historical ownership)	289	2303 N. Randolph Ave.	R102681	1N1E27CB01500	R009616580
Summit Properties (historic property (xii))	305	1462 NW Front Ave. (NW Naito Pkwy)	R298548	1N1E27CC00200	R883803120
Longview City Laundry (historic property (vi))	481, 528, 585	2801 NW Nela St. 2817 NW Nela St. 2950 NW 29 th Ave. 2900 NW 29 th Ave.	R316473 R316451 R316449 R316444 R316515	1N1E29AC00300 1N1E29AC00400 1N1E29AC00200 1N1E29AC00100 1N1E29AD01000	R941291260 R941291110 R941291090 R941291040 R941291830
Williams Cindy (historical ownership)	620	3660 NW Front Ave. 3628 NW Front Ave.	R315957 R315944	1N1E20DD00300 1N1E20DD00100	R941201040 R941200870
Linnton Substation (historical ownership)	629	Intersection of NW Hoge Ave. and NW St. Helens Rd.	Unknown	Unknown	Unknown
Hawthorne Shop (historic ownership)		1510 SE Water Ave.	R275770 R275768 R275769 R275767	1S1E03DA1300 1S1E03DA1100 1S1E03DA01000 1S1E03DA01200	R794001000 R794000920 R794000990 R794000900
Station L (historic ownership)		1945 SE Water Ave. 1701 SE Water Ave. 211 SE Caruthers St.	R504993 R326765 R326764 R326759 R326766 R326758 R490515	1S1E03D00101 1S1E03D00100 1S1E03D00200 1S1E03D00500 1S1E03D00400 1S1E03D00300 1S1E03D00301	R991030800 R991030760 R991030750 R991030700 R991030770 R991030690 R991030790

		2015 SW Water Ave. 2201 SE 2 nd Pl.	R247366 R247367 R247368 R247369 R657640 R657638 R657639	1S1E03DD00600 1S1E03DD00500 1S1E03DD00200 1S1E03DD00300 1S1E03DD00301 1S1E03DD00202 1S1E03DD00203	R668200050 R668200100 R668200150 R668200200 R668200210 R668200170 R668200180
Fulton Substation (historic ownership)		0540 SW Nevada St. (540 S. Nevada St.)	R590739 R582379	1S1E22BD80000 1S1E22BD00101	R521900010 R649862490 (historic boundary does not correspond exactly to modern tax lot)
Jefferson Substation (historic ownership)		1236 SW 1 st Ave.	R681278	1S1E03BD03500	R667701394
Riverview Substation and adjacent historic property		Near 600 SW Taylors Ferry Rd. and 7606 SW Fulton Park Blvd.	R330295 R330286 R167136 R330318	1S1E22BD05300 1S1E22BD05400 1S1E22BD05700 1S1E22BD05500	R991220330 R991220190 R300405510 R991220590
Rose City Core Building		3100 NW Industrial St.	R174627	1N1E29CA00600	R347600340
Stephens Substation		1830 SE Water Ave.	R326733	1S1E03DA04400	R991030210
World Trade Center		121 SW Salmon St. 25 SW Salmon St. 26 SW Salmon St.	R245931 R245917 R245918	1S1E03BA02100 1S1E03BA00200 1S1E03BD00200	R667702030 R667700830 R667700970
Marquam Substation		2521 S. Water Ave	R128841	1S1E10BA05000	R140905240
Historic Property (ii)		2611 SE 4 th Ave.	R197256	1S1E10AA00600	R448700650
Historic Property (iii)		101 through 119 SW Main and 1031 through 1037 SW 1 st Ave.	R245930	1S1E03BD00300	R667701850

Historic Property (vii)	189, 205	3710 NW Front 3657 NW Front	R315900 R315954	1N1E20DD00200 1N1E20DD00400	R941200060 R941200980
Historic Property (viii)		7560 and 7568 SW La View Dr. (7560 and 7568 S. La View Dr.)	R166807 R167128	1S1E22BD06100 1S1E22BD06000	R300100540 R300405390
Historic Property (x)		Near SW Montgomery St. and SW Water Ave	Unknown	Unknown	R77750310
Historic Property (xi)		Northeast Corner of SW 1 st and SW Alder St.	R245899	1S1E03BA01000	R667700010
Historic Property (xiii)	289	Near N. Loring and N. Randolph 2303 N. Randolph	R102681	1N1E27CB01500	R009616580
Historic Property (xiv)		Near SE Main and SE Water St.	R676298	1S1E03AD03603	R649672090
Historic Property (xv)		Between SW 1 st Ave. and 2 nd on SW Ash St.	R246026 R246021 R246025	1N1E34CD01800 1N1E34DC02400 1N1E34CD01900	R667704300 R667704220 R667704280
Historic Property (xvi)		SW Macadam, Fulton District, Near SW Miles Pl.	R330343	1S1E22AC04800	R991220920

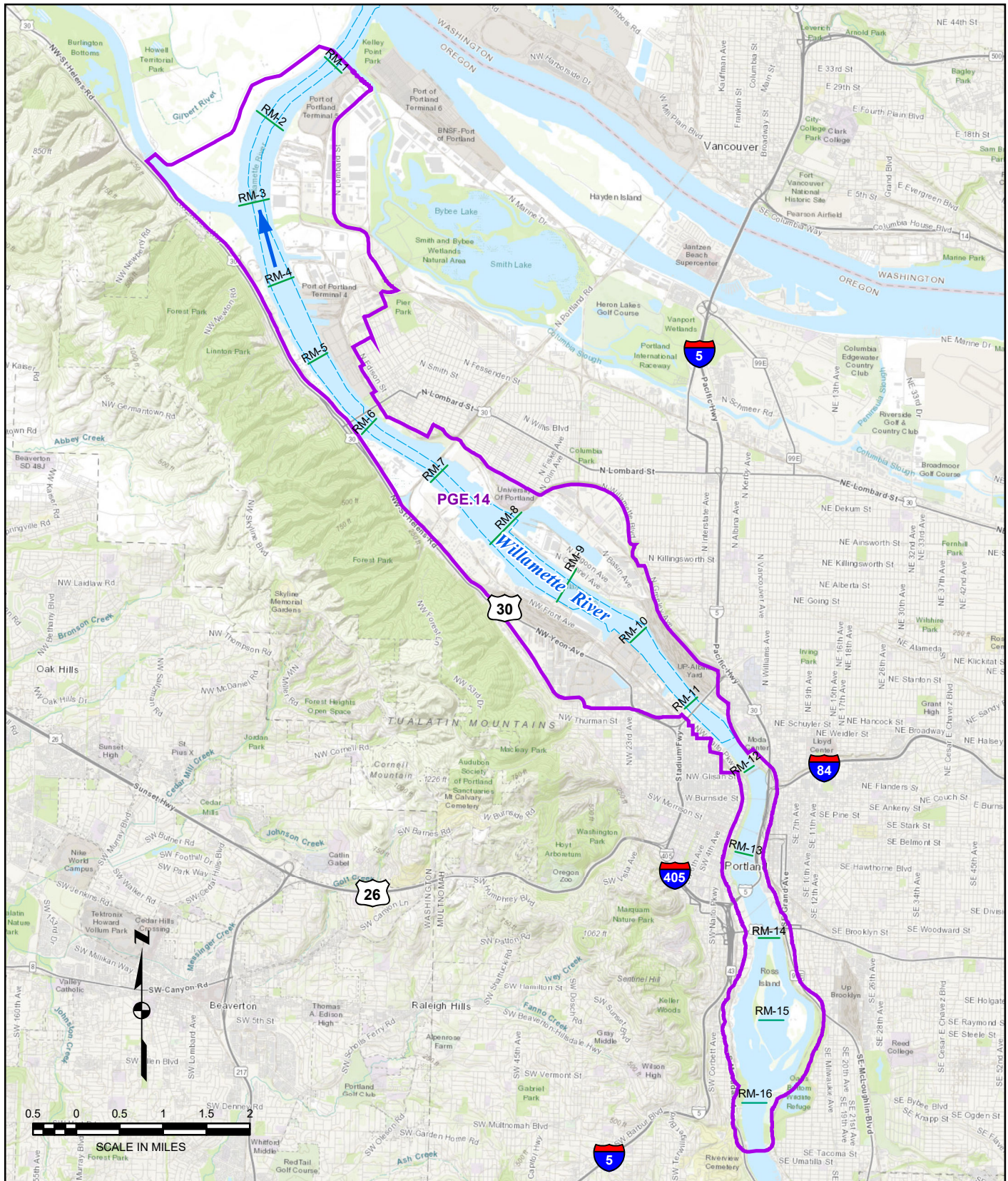
Part II: Map of Portland General Electric Company Distribution Network

In addition to the real properties specified in Part I of this Appendix A where PGE distribution network equipment and property may be or was historically located on properties currently or formerly owned or operated by PGE, maps of the distribution transformers (network, overhead, and underground), cable crossings, and PGE current and historical properties within the PGE Distribution Network Area Boundary are provided as Exhibits A-1 and A-2 to this Appendix A. The equipment indicated in Exhibit A-2, and all poles, towers, transmission and distribution lines, submerged or underground cables and lines, transformers, capacitors, switches, reclosers, vaults and other PGE equipment located within the PGE Distribution Network Area Boundary indicated on the map in Exhibit A-1 but not specifically indicated in Exhibit A-2, are included within this Appendix A. This Appendix A includes all releases of hazardous substances or pollutants from that equipment or activities associated with that equipment (including

but not limited to: installation, use, maintenance, and replacement or removal of equipment; spill response; and periodic removal of water accumulated in vaults).

Part III: Activities and releases

In addition to releases of hazardous substances or pollutants from real properties specified in Part I of this Appendix A, and from the distribution network transformers and other equipment identified in Part II of this Appendix A, Part III of this Appendix A is a table of spills and releases covering the period between July 1979 and September 2020 from PGE's distribution network, submerged cables and miscellaneous activities, described as "PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary" in Exhibit A-3 to this Appendix A. In addition to the spills identified in Exhibit A-3, this Appendix A also includes releases of hazardous substances or discharges of pollutants from spills prior to July 1979 within the PGE Distribution Network Area Boundary shown in Exhibit A-1.



Sources: ESRI 2019 – ArcGIS Data Basemaps.pdf; AEGIS 2020 – DC736 FFIDs.pdf; APGIS 2019 – DC1019 Willamette Navigation.pdf.

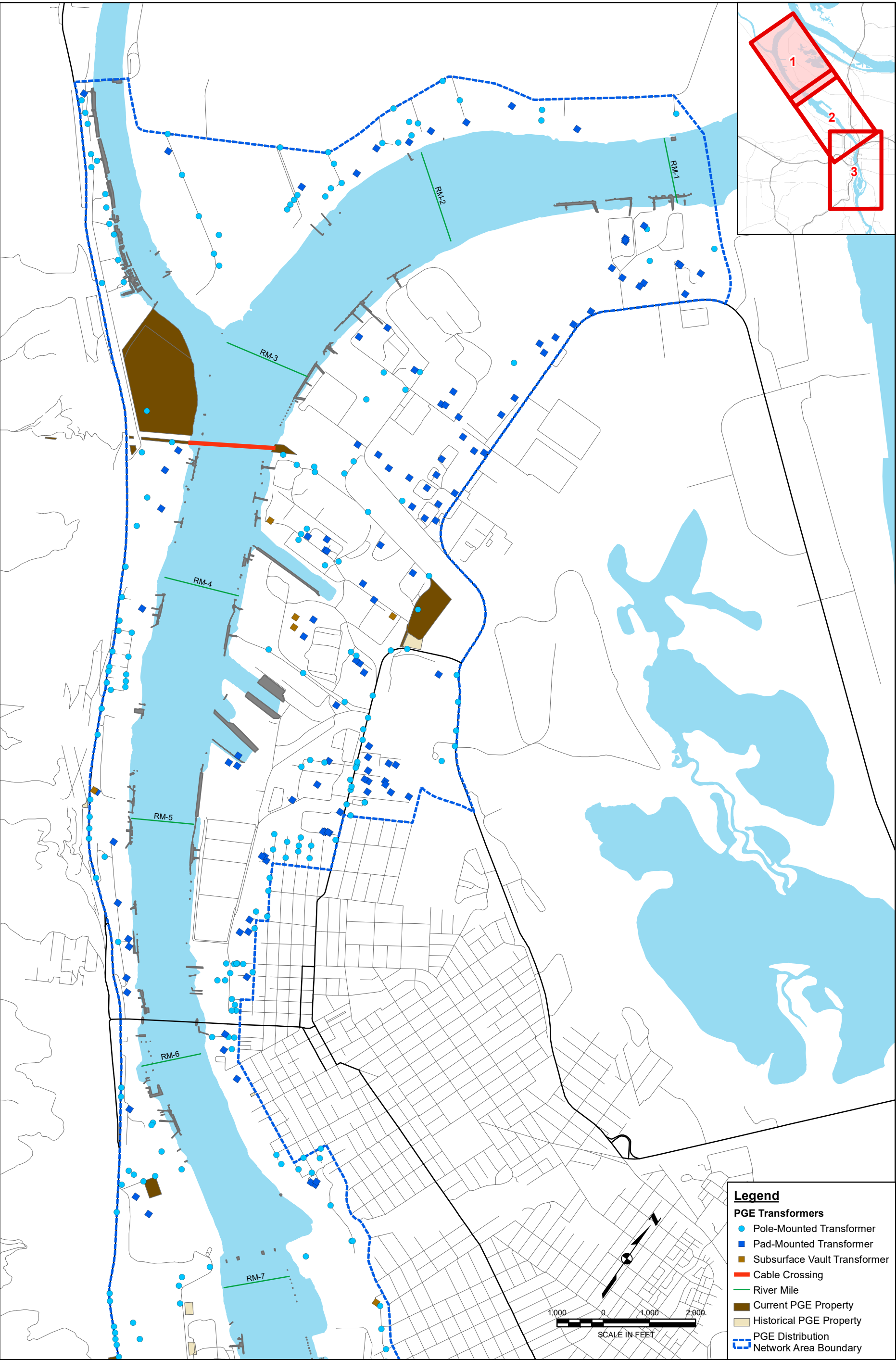
Legend

- River Flow Direction
- River Mile
- PGE Distribution Network
- Area Boundary
- Navigation Channel

Exhibit A-1

PGE DISTRIBUTION
NETWORK AREA BOUNDARY
PORTLAND, OREGON

JUNE 2022

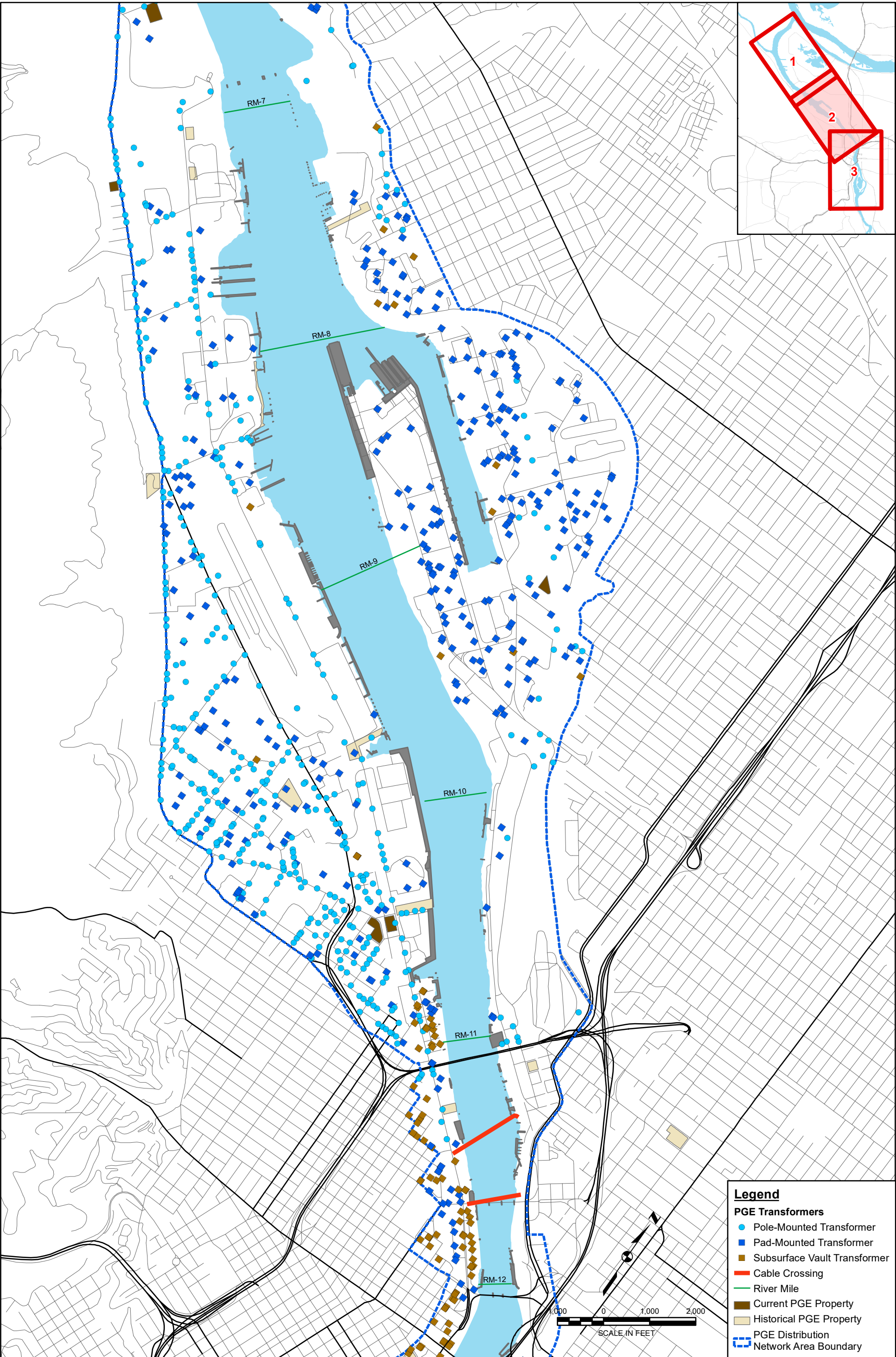


Sources: PGE0163453 (RLIS Data, 06/28/2019); River Miles Lines, 2011 (DC 47);
Willamette River Navigation Channel, 5/15/2019 (DC 1019);
TPA RM10W Expert Report at Appendix I (Table A1);
PGE0247893 (Portland Transformer Inventory, 03/2020);

Exhibit A-2

PGE TRANSFORMERS,
EQUIPMENT AND PROPERTIES
PORTLAND, OREGON

JUNE 2022

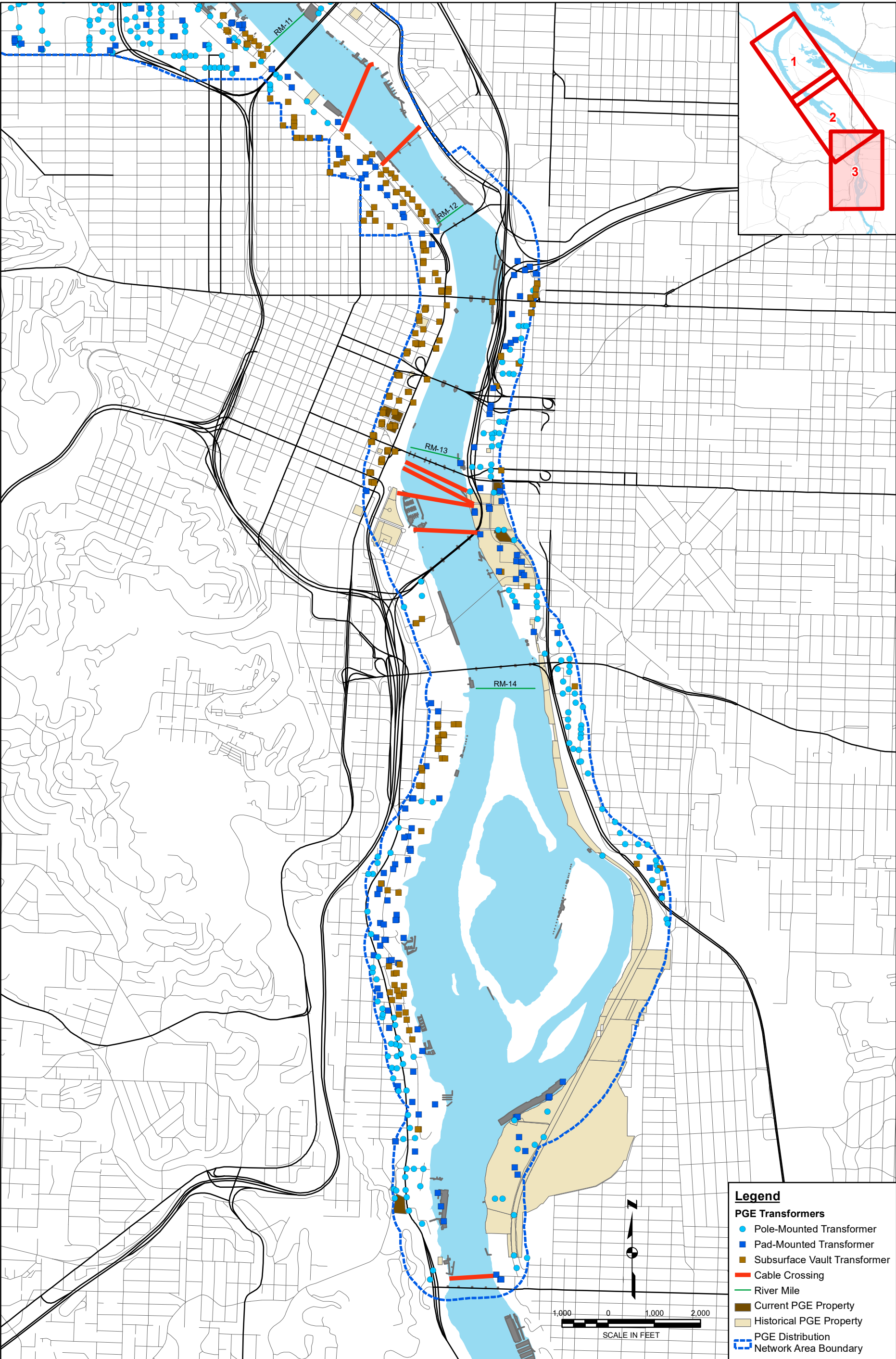


Sources: PGE0163453 (RLIS Data, 06/28/2019); River Miles Lines, 2011 (DC 47);
Willamette River Navigation Channel, 5/15/2019 (DC 1019);
TPA RM10W Expert Report at Appendix I (Table A1);
PGE0247893 (Portland Transformer Inventory, 03/2020);

Exhibit A-2

PGE TRANSFORMERS,
EQUIPMENT AND PROPERTIES
PORTLAND, OREGON

JUNE 2022



Sources: PGE0163453 (RLIS Data, 06/28/2019); River Miles Lines, 2011 (DC 47);
Willamette River Navigation Channel, 5/15/2019 (DC 1019);
TPA RM10W Expert Report at Appendix I (Table A1);
PGE0247893 (Portland Transformer Inventory, 03/2020);

Exhibit A-2

PGE TRANSFORMERS,
EQUIPMENT AND PROPERTIES
PORTLAND, OREGON

JUNE 2022

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

Spill Date	Street Address	Spill Equipment Type	Quantity Spilled (gallons) ¹	PCB Content of Spill (ppm) ²	Spill Description	Overwater Spill	Oil Entered Storm Drain	PCB Content Unknown, Non-PCB, or < 50 ppm	Quantity Spilled Unknown
1979-07-06	Linnton Plywood	Transformer	0.25		A transformer located on a piling 100 feet into the Willamette River cracked and leaked into the river. PGE called Western Environmental Services to clean up the spill and no oil was found on the water. PGE subsequently relocated the transformer bank to land.	Yes	No	Yes	No
1984-04-10	NW 109th & St. Helens Road	Transformer	35	53	A public vehicle hit a power pole causing a pole-mount transformer to spill its contents into the street and most of the oil entered the combined storm/sanitary drain.	No	Yes	No	No
1985-10-04	NW 25th and Nicolai St	Transformer	0.125	Non-PCB	A non-PCB transformer spilled 1 pint of its contents.	No	No	Yes	No
1985-11-25	Basin St. on Swan Island	Transformer	10	18	A transformer spilled oil but it did not flow to any storm drains.	No	No	No	No
1986-03-04	Near 200 SE Spokane (Sellwood Moorage)	Transformer	5	5	During flooding, 19 houseboats broke from their moorage. Top bushings on transformers located on the dock ruptured and leaked into the river.	Yes	No	No	No
1986-03-15	3245 N Willamette Blvd	Transformer	20	40	A public vehicle hit a power pole causing a pole-mount transformer to spill its contents. All oil went into the storm drain.	No	Yes	No	No
1986-05-05	3300 NW Yeon	Transformer	1	Non-PCB	A non-PCB pad-mount transformer leaked at Schnitzer Steel.	No	No	Yes	No
1986-05-06	12005 N Burgard	Transformer	1	Non-PCB	A non-PCB pad-mount transformer leaked at Palmco Oil.	No	No	Yes	No
1986-06-12	8200 SW Macadam	Transformer	5	26	A pole-mount transformer spilled oil onto the sidewalk.	No	No	No	No
1986-06-26	NW Yeon E of Expressway	Other - Truck	15	Non-PCB	A PGE line truck spilled hydraulic oil on new sub-grade.	No	No	No	No
1986-07-23	2000 NW Wilson	Transformer	1	11	A 300 kVa pad-mount transformer leaked.	No	No	No	No
1986-08-09	120 SW Columbia St.	Capacitor	1	Non-PCB	A non-PCB capacitor spilled oil.	No	No	No	No
1986-08-21	2 blocks south of NW 26th and Yeon	Other - Truck	3	Non-PCB	A PGE line truck spilled hydraulic oil onto public property.	No	No	No	No
1986-09-04	3059 NW Yeon	Other - Truck	5	Non-PCB	A PGE bucket truck spilled hydraulic oil onto the roof and exterior wall of a Goodyear Rubber building.	No	No	No	No
1987-04-14	SW Macadam N of Sellwood Bridge	Other - Truck	3	Non-PCB	A PGE line truck spilled hydraulic oil onto public roadway.	No	No	No	No
1987-06-04	NW 30th Ave and St. Helens Road	Other - Truck	4	Non-PCB	A PGE line truck spilled hydraulic oil onto a private driveway.	No	No	No	No
1987-06-24	4900 SW Landing Dr	Transformer	1	<1	A pad-mount transformer spilled oil onto soil and pad.	No	No	No	No
1988-08-05	2335 NW 29th	Transformer	0.125	12	A transformer spilled onto public street.	No	No	No	No
1988-12-02	5400 N Basin	Transformer	20	30	A pole-mount transformer leaked from a bullet hole onto gravel and a private vehicle below.	No	No	No	No
1989-01-19	12005 North Burgard	Transformer (3)	20	<1	A truck hit a pole causing three pole-mount transformers to spill oil onto the street. Lab analysis of oil reported as less than 1 ppm PCBs.	No	No	No	No
1989-05-16	4705 NW Front	Transformer	0.25	Non-detect	A transformer spilled oil onto asphalt. Lab analysis of oil did not detect PCBs.	No	No	No	No
1990-04-24	5949 N Basin	Transformer	75	Non-detect	A transformer malfunctioned and sprayed oil over the surrounding area. Some oil was transported to a drain to pump station and then to treatment plant; not the Willamette River. Lab analysis of oil did not detect PCBs.	No	Yes; not river	No	No

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

Spill Date	Street Address	Spill Equipment Type	Quantity Spilled (gallons) ¹	PCB Content of Spill (ppm) ²	Spill Description	Overwater Spill	Oil Entered Storm Drain	PCB Content Unknown, Non-PCB, or < 50 ppm	Quantity Spilled Unknown
1990-06-05	3325 NW Yeon	Transformer	2	5	A pole-mount transformer spilled onto the street, a private vehicle, and one person. A pole fire occurred.	No	No	No	No
1990-08-27	5617 N Basin	Transformer	10	10	A pad-mount transformer spilled at Island Leasing Corp.	No	No	No	No
1990-10-24	Swan Island north of Kittridge/Leverma	Capacitor bank	3	Non-PCB	Multiple pole-mount non-PCB capacitors leaked oil onto vegetation.	No	No	No	No
1990-11-24	2727 NW 29th	Capacitor	2	Non-PCB	Non-PCB capacitor spilled oil onto asphalt and caught on fire.	No	No	No	No
1991-01-30	4927 NW Front	Transformer	1	<1	A transformer was dripping oil onto asphalt and soil. Sticker indicated PCB content of less than 1 ppm.	No	No	No	No
1991-04-24	110 SE Caruthers	Transformer	2	36	A pole-mount transformer leaked oil onto pole, soil, and vegetation.	No	No	No	No
1991-07-23	290 SE Spokane	Transformer	5	<50	A pad-mount transformer leaked oil onto pad and vegetation.	No	No	Yes	No
1991-10-23	9300 N Columbia	Capacitor	2	Non-PCB	Non-PCB pole-mount capacitor spilled oil.	No	No	No	No
1991-10-31	SE Madison and Water	Transformer	14	15	A transformer leaked oil onto asphalt and two private vehicles.	No	No	No	No
1992-06-23	3232 NW Industrial	Transformer (3)	10	Non-detect	Three transformers spilled onto soil/bark dust and asphalt. Lab analysis of oil did not detect PCBs.	No	No	No	No
1992-07-30	Water Ave and Belmont	Other - Truck	4	Non-PCB	A PGE line truck spilled hydraulic oil onto the asphalt of a public street.	No	No	No	No
1992-12-17	7540 NW St. Helens	Other - Unknown	22	Non-PCB	A hydraulic spill from an unknown source contaminated 4,000 square feet of water, soil, and asphalt.	No	No	No	No
1993-02-26	2181 NW Nicolai	Transformer	2	<1	One transformer spilled oil onto soil and gravel. Sticker indicated PCB content of less than 1 ppm.	No	No	No	No
1993-02-26	2181 NW Nicolai	Transformer	3	<1	One transformer spilled oil onto soil and gravel. Sticker indicated PCB content of less than 1 ppm.	No	No	No	No
1993-06-11	SW Madison and SW 2nd	Transformer	5	5	PGE crews cleaned up oil.	No	Yes	No	No
1993-08-11	NW 6th and Johnson St	Other - Vault cable	0.0625	Non-PCB	Spill was contained in vault (V18), no cleanup required. Paper insulated lead covered (PILC) cable paper is saturated with oil, which may or may not contain PCBs.	No	No	Yes	No
1993-09-03	2900 NW 29th Ave	Transformer	0.03125	3	A pole-mount transformer leaked oil on the sidewalk and a car.	No	No	No	No
1993-10-12	3900 NW Yeon	Transformer	2	38	A pole-mount transformer malfunctioned and spilled oil onto asphalt, sidewalk, and railroad tracks. Oil entered a storm drain.	No	Yes	No	No
1994-02-14	SE Caruthers and 3rd Ave	Transformer	5	<1	A pole-mount transformer leaked oil onto asphalt and private vehicles. Lab analysis of oil reported as less than 1 ppm PCBs.	No	No	No	No
1994-07-06	3003 NW 35th	Transformer	4	9	A transformer spilled oil onto cement.	No	No	No	No
1994-07-12	NW 31st and Luzon	Transformer	0.1	48	A pole-mount transformer spilled oil onto asphalt.	No	No	No	No
1994-07-14	0225 SW Montgomery	Other - Vault cable	0.25	Non-PCB	A cable-splice released a tar-like substance into a vault.	No	No	No	No
1994-12-13	3 Spans South of N Ensign	Other - Equipment	2	Non-PCB	A PGE hole digger spilled hydraulic oil onto soil.	No	No	No	No
1994-12-21	E of Ensign Street at Swan Island	Other - Truck	20	Non-PCB	A PGE boom truck spilled hydraulic oil onto soil at railroad tracks and puddle of water.	No	No	No	No

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

Spill Date	Street Address	Spill Equipment Type	Quantity Spilled (gallons) ¹	PCB Content of Spill (ppm) ²	Spill Description	Overwater Spill	Oil Entered Storm Drain	PCB Content Unknown, Non-PCB, or < 50 ppm	Quantity Spilled Unknown
1995-04-08	N Columbia and N Burgard	Transformer (4)	10	43	A vehicle hit a transformer pole causing it to break and then bring down three other poles. Four transformers ruptured and spilled oil onto asphalt and soil. About 10 gallons flowed into a storm drain and then to a pond. About 25 gallons spilled to the street. Lab analysis of oil in one transformer (15 kVA #3733) had 43 ppm PCBs and the oil other three transformers did not detect PCBs.	No	Yes; not river	No	No
1995-08-06	NW 21 Ave and Wilson	Other - Truck	10	Non-PCB	A PGE line truck spilled hydraulic oil onto asphalt and into storm drain.	No	No	No	No
1995-08-23	3200 NW Yeon	Transformer	1	---	A transformer leaked oil onto its concrete pad. PCB content is unknown.	No	No	Yes	No
1995-09-27	4315 SE McLoughlin Blvd at railroad tracks	Other - Oil	20	Non-PCB	Hydraulic oil spilled onto soil.	No	No	No	No
1995-11-01	3200 SE McLoughlin	Transformer	0.125	<1	A transformer leaked oil on soil. Sticker indicated PCB content of less than 1 ppm.	No	No	No	No
1996-02-01	3055 NW 29th Ave	Transformer	0.0625	22	A transformer spilled oil onto soil, asphalt, bushes, and seven vehicles.	No	No	No	No
1996-02-16	NW 9th and Front	Other - Train	20	Non-PCB	Non-PGE spill. Diesel fuel spilled from train and migrated into a PGE vault.	No	No	No	No
1996-04-30	1626 SE Water	Transformer	1	15	A pad-mount transformer spilled oil onto sand.	No	No	No	No
1996-05-03	3930 NW Yeon	Transformer	0.004	15	A transformer spilled oil onto soil.	No	No	No	No
1996-05-24	3319 NW Yeon	Transformer	2.5	<1	A pole-mount transformer spilled oil onto asphalt and ivy. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
1996-07-01	3250 NW St Helens Rd	Transformer	15	<1	While filling a transformer with oil, oil overflowed and spilled onto asphalt. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
1996-07-23	7521 N Edgewater	Transformer	0.125	<1	No description is available.	No	No	No	No
1996-07-26	2000 NW Wilson	Transformer	1.5	14	A transformer spilled oil onto soil and concrete pad.	No	No	No	No
1996-08-01	1212 NW 9th Ave	Other - Unknown	1.5	Non-PCB	No description is available.	No	No	No	No
1997-04-14	HWY 30 and Marina Way	Capacitor	0.25	Non-PCB	Capacitor malfunctioned and vegetation was impacted by release. Lab analysis of oil did not detect PCBs.	No	No	No	No
1997-12-01	5400 N Basin	Transformer	3	<1	A transformer spilled oil onto asphalt. Sticker on transformer and lab analysis indicated PCBs of less than 1 ppm.	No	No	No	No
1998-01-09	2279 NW Front	Other - Diesel	---	Non-PCB	Diesel spilled to soil from an unknown source.	No	No	No	Yes
1998-02-27	6941 N Roberts	Transformer	5	260	A transformer spilled oil onto soil, asphalt, and ten vehicles.	No	No	No	No
1998-03-31	2603 SE Grand Ave	Transformer	2	<1	A pole-mount transformer malfunctioned and spilled oil onto the asphalt and sidewalk, and into a storm drain. Sticker indicated PCBs of less than 1 ppm.	No	Yes	No	No
1998-04-30	N Columbia Blvd. and Lombard	Other - Truck	14	Non-PCB	A PGE truck spilled hydraulic oil onto soil outside Rivergate Substation.	No	No	No	No
1999-02-19	10400 N Burgard Way	Transformer	1	7	A transformer spilled oil from its vault (V2736) onto soil and into a ditch.	No	No	No	No
1999-03-09	15540 N Lombard	Transformer	0.5	48	No description is available.	No	No	No	No

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

Spill Date	Street Address	Spill Equipment Type	Quantity Spilled (gallons) ¹	PCB Content of Spill (ppm) ²	Spill Description	Overwater Spill	Oil Entered Storm Drain	PCB Content Unknown, Non-PCB, or < 50 ppm	Quantity Spilled Unknown
1999-04-09	8435 N Crawford	Transformer	3	52	A pole-mount transformer spilled oil onto soil, cement, and truck parts.	No	No	No	No
1999-05-19	11080 NW St. Helens Rd	Transformer (2)	20	14	Traffic accident caused release of oil from two transformers.	No	Yes; Columbia River or Treatment Plant	No	No
1999-07-22	1225 SE Holgate Blvd	Transformer	30	Non-PCB	A transformer spilled oil onto asphalt, vegetation, and concrete.	No	No	Yes	No
1999-08-10	9420 NW St. Helens Rd	Other - Equipment	0.125	Non-PCB	Hydraulic oil spilled onto asphalt.	No	No	No	No
1999-10-04	5555 N Channel Ave	Transformer	0.125	<1	A pole-mount transformer spilled oil onto concrete and gravel. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
1999-12-14	600 NW Naito	Transformer (3)	21	No oil spill	A train derailment west of the Steel Bridge caused a fire at three transformers. The meter base burned but not the transformers. No spilled oil was observed by PGE.	No	No	No	No
1999-12-15	720 NW Front	Transformer	0.125	<1	A transformer leaked oil onto soil. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
2000-03-16	10200 N Lombard	Transformer	0.5	48	No description is available.	No	No	No	No
2000-10-07	NW 1 Ave and Flanders	Transformer	0.5	<1	A transformer spilled on soil. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
2000-12-04	NW 23 Pl and Nicolai	Other - Truck	20	Non-PCB	A PGE boom truck spilled hydraulic oil onto asphalt.	No	No	No	No
2001-12-11	SW Main St between 1 and 2 Ave	Transformer	0.0634	<1	A pole-mount transformer spilled oil onto asphalt and sidewalk. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
2002-03-14	NW 17th and Thurman	Other - Truck	1	Non-PCB	A PGE line truck spilled hydraulic oil.	No	No	No	No
2002-05-07	2800 NW 29TH Ave	Transformer (6)	65	32	A Freightliner truck backed into a pole causing six transformers to spill onto asphalt and into a storm drain.	No	Yes	No	No
2003-05-04	5688 or 6688 NW St. Helens Road	Transformer (3)	2	<1	A tree fell and hit three transformers causing oil to spill onto asphalt, gravel, and vegetation. The oil was confined to the embankment and did not reach waterways.	No	No	No	No
2003-05-23	2701 NW Vaughn (Montgomery Park)	Transformer	3	5	A transformer released oil into a vault (V5523). PGE personnel cleaned up spill by surface cleaning and removing 1 yard of soil.	No	No	No	No
2003-07-28	3601 NW Yeon	Transformer	0.25	<1	A pole-mount transformer spilled oil onto soil, concrete, and cars. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
2003-07-31	2344 NE 21 Place	Transformer	0.5	<1	A pole-mount transformer spilled oil onto asphalt and a car. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
2003-09-02	2800 NW Front Ave	Transformer	--	<1	A transformer spilled oil onto gravel. Sticker indicated PCBs of less than 1 ppm.	No	No	No	Yes
2003-12-16	Greeley and Going (on the Hwy Ramp)	Transformer	20	<1	A pole-mount transformer spilled oil onto asphalt. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
2004-01-14	1800 NW 16th Ave	Transformer	5	39	A pole-mount transformer malfunctioned leaking oil onto the asphalt and soil, and into a storm drain.	No	Yes	No	No

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

Spill Date	Street Address	Spill Equipment Type	Quantity Spilled (gallons) ¹	PCB Content of Spill (ppm) ²	Spill Description	Overwater Spill	Oil Entered Storm Drain	PCB Content Unknown, Non-PCB, or < 50 ppm	Quantity Spilled Unknown
2005-04-15	6936 Fathom Street	Other - Unknown	--	Non-PCB	NRC Environmental Services pumped out PGE's vault found to contain diesel and water. The "spill" refers to the fact that diesel was found in vault water, likely related to a leaking diesel UST that was removed on 4/26/2005. The 2,433 gallons of waste water was transported to Cascade General for disposal.	No	No	No	Yes
2005-08-30	NW 12th Ave & NW Overton St	Other - Paint	--	Non-PCB	No description is available.	No	No	No	No
2005-10-14	N Greeley and Going St	Other - Truck	2	Non-PCB	A PGE line truck spilled hydraulic oil onto asphalt, soil, and a line truck.	No	No	No	No
2007-01-12	Corner of McLoughlin & SE Long	Transformer	37	66	A transformer spilled oil onto soil.	No	No	No	No
2007-03-14	8424 N Crawford St	Transformer	1	<1	A pole-mount transformer spilled oil onto soil and concrete curb. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
2007-07-04	5828 N Van Houten	Transformer (3)	30	<1	Vandals caused three pole-mount transformers to spill oil onto soil. Lab analysis indicated PCBs of less than 1 ppm.	No	No	No	No
2007-07-11	8970 N Bradford St	Transformer (3)	200	30	Vandals knocked three pole-mount transformers to the ground spilling oil onto asphalt, soil, and vegetation.	No	No	No	No
2007-12-01	202 SE Stark St	Transformer	1	<1	A vehicle-strike caused a pole-mount transformer to spill oil onto asphalt, soil, and cement. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
2008-04-04	2017 NW Vaughn	Other - Equipment	15	Non-PCB	A hole digger spilled hydraulic oil onto asphalt. Heavy rains caused some of the oil (no PCBs) to flow into a storm drain.	No	No	No	No
2008-06-16	6707 N Basin	Transformer	336	<1	A transformer fire leaked oil into concrete vaults 33 and 32 (at Pad 47). Transformer oil was not released into the environment. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
2008-08-27	2728 NW Nela St	Transformer (2)	2	24	Two transformers leaked oil onto asphalt and concrete. Lab analysis indicated PCB content of 11 ppm and 24 ppm.	No	No	No	No
2008-12-05	6635 N Baltimore Ave	Transformer	1	<1	A transformer leaked oil onto asphalt and soil. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
2009-01-07	Behind 4750 N. Princeton	Other - Oil	--	Non-PCB	No description is available.	No	No	No	No
2009-06-17	SW 2nd & Madison	Other - Truck	10	Non-PCB	PGE line truck spilled hydraulic oil to asphalt.	No	No	No	No
2010-03-03	3340 NW St Helens	Transformer	1.5	Non-detect	A transformer fire leaked oil onto soil, asphalt and railroad track. Lab analysis of oil did not detect PCBs.	No	No	No	No
2010-06-02	Eastbound off ramp at Greeley and Going Ave	Transformer	2	<1	A fallen tree caused a pole-mount transformer to spill oil. Sticker indicated PCBs of less than 1 ppm.	No	No	No	No
2010-12-11	4555 North Channel	Transformer	1	128	PGE observed a small stain under a pad mount transformer during an equipment change out.	No	No	No	No

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

Spill Date	Street Address	Spill Equipment Type	Quantity Spilled (gallons) ¹	PCB Content of Spill (ppm) ²	Spill Description	Overwater Spill	Oil Entered Storm Drain	PCB Content Unknown, Non-PCB, or < 50 ppm	Quantity Spilled Unknown
2011-11-02	2515 NW Nicolai	Transformer	50	17	A public vehicle hit a power pole causing three pole-mount transformers to fall (Company numbers 1634, 1635, & 1636). Transformer company number 1636 did not spill oil. This record is for one transformer (Company number 1634) which spilled all of its contents onto asphalt and into filtered catch basin at Calbag Metals. PGE did not observe oil in the downgradient storm drain.	No	No	No	No
2011-11-02	2515 NW Nicolai	Transformer	25	13	A public vehicle hit a power pole causing three pole-mount transformers to fall (Company numbers 1634, 1635, & 1636). Transformer company number 1636 did not spill oil. This record is for one transformer (Company number 1635) which spilled half of its contents onto asphalt and into filtered catch basin at Calbag Metals. PGE did not observe oil in the downgradient storm drain.	No	No	No	No
2011-11-03	7540 NW St Helens Rd	Transformer	1	4	An equipment malfunction caused a pole-mount transformer to leak onto soil and gravel. PGE personnel cleaned up spill by removing 2 cubic feet of soil.	No	No	No	No
2012-07-24	2420 NW 31ST	Transformer	30	11	Transformer malfunction spilled oil to soil, gravel, and asphalt.	No	No	No	No
2013-01-14	4810 N Lagoon Ave	Transformer	5	<1	Vehicle hit and damaged pad-mount transformer. About 4 square feet of concrete was affected. The spill crew responded and cleanup was completed the same day. Less than 1 ppm.	No	No	No	No
2013-04-18	615 NW or SW Naito Pkwy	Transformer	0.125	<1	Release was confined to a concrete vault. Spill response completed cleanup the same day. Less than 1 ppm.	No	No	No	No
2013-04-29	5115 N Lagoon	Transformer	2	<1	Transformer malfunction caused a release to soil and asphalt. Approximately 20 square feet of soil and asphalt were affected. Complete cleanup had to wait until scheduled power down, on 5/11/2013. 3 cubic feet of soil removed, asphalt cleaned. Less than 1 ppm.	No	No	No	No
2013-05-29	6834 NW St Helens Rd	Transformer (3)	44	<1	Three pole-mount transformers were damaged by weather/tree fall, which resulted in a release to soil and asphalt. Lab analysis of oil did not detect PCBs.	No	No	No	No
2013-05-31	6834 NW St Helens (Hwy 30)	Transformer (3)	1	<1	Vegetation impacted by three pole-mount transformers damaged by weather/tree fall on 5/29/13.	No	No	No	No
2013-09-04	NW Saltzman Rd & Hwy 30	Transformer	3	Non-detect	Transformer malfunction caused oil spill that reached soil/gravel and asphalt, but not a storm drain. Lab analysis of oil did not detect PCBs.	No	No	No	No
2015-07-06	11080 NW St Helens Rd	Transformer (2)	25	<1	Approximately 300 sq. feet of asphalt was affected. Less than 1 ppm.	No	No	No	No
2015-08-07	7900 NW Yeon Ave	Transformer (2)	3	29	Vehicle hit pole during dry weather. Spill response completed cleanup the same day.	No	No	No	No
2015-08-22	11820 NW St Helens Rd	Transformer	1	<1	Less than 1 ppm.	No	No	No	No
2016-02-10	4800 NW Front Ave	Transformer	2	<1	Less than 1 ppm.	No	No	No	No
2018-06-17	6161 NW 61st	Transformer (3)	80	<1	A storm caused a pole to fall and two of three transformers spilled their contents onto asphalt and into a storm drain.	No	Yes	No	No
2018-07-12	9442 N Ramsey Blvd	Transformer	2	<1	Less than 1 ppm.	No	No	No	No
2019-02-15	3627 N. Anchor Street	Transformer	0	<1	Vehicle hit transformer pad and started a fire. Approximately 2 cubic feet of soot-impacted soil was removed.	No	No	No	No

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

Spill Date	Street Address	Spill Equipment Type	Quantity Spilled (gallons) ¹	PCB Content of Spill (ppm) ²	Spill Description	Overwater Spill	Oil Entered Storm Drain	PCB Content Unknown, Non-PCB, or < 50 ppm	Quantity Spilled Unknown
2019-05-24	12005 N. Burgard Way	Transformer (3)	80	<1	Transformer pole fell due to rotten wood, resulting in a fire and a release of 80 gallons of transformer oil from three pole-mounted transformers.	No	No	No	No
2020-01-12	Not provided	Regulator	110	<1	Electrical fault caused a regulator to rupture and release oil onto soil and gravel. Soil and gravel removal, soil sampling, and backfill was completed on 1/14/2020.	No	No	No	No
2020-02-26	9040 N Burgard Way	Transformer	5	<1	Car hit pole causing the attached transformer to spill oil into storm drains. Oil was cleaned and vacuumed from the impacted storm drains.	No	Yes	No	No
2020-05-31	4456 NW Yeon Ave	Transformer	1	<91	Transformer released approximately 1 gallon of oil containing < 91 ppm PCB (9/23/2016 oil sample).	No	No	Yes	No

Appendix A – Portland Terminal Railroad Company

The properties listed below are identified for Portland Terminal Railroad Company for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number (Tax Lot number) and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address. The attached map should be considered part of this Appendix A. The table and figure, combined, provide a comprehensive picture of the released properties.


Site ID No.	Street Address	County Tax Parcel ID	Assessor Property ID	State ID	Notes
197	3500 NW Yeon Ave.	R941190180	R315812	1N1E19A-01900	See attached map
		R941190170	R315811	1N1E19DA-00200	
		R941190010	R315800	1N1E19DA-00100	
		R941201230	R315980	1N1E20-01300	
		R941200040	R315899	1N1E20 -01400	
		R941201250	R315982	1N1E20 -01200	
		R941190580	R315841	1N1E19B-01300	
		R941190560	R315839	1N1E19A-02000	
		R941190040	R315801	1N1E19DA-00300	
		R941190600	R315843	1N1E19DA-00400	
		R941190610	R315844	1N1E19DA-00500	
		R941190590	R315842	1N1E19DA-00600	
		R941190570	R315840	1N1E19DA-00700	
		R941190660	R315847	1N1E19DA-00800	
		R941190670	R315848	1N1E19DA-00900	
		R941190830	R315861	1N1E19DA-01100	
		R941190350	R315820	1N1E19DA-01000	
		R941290680	R316412	1N1E29AA-01700	
		R941290730	R316419	1N1E29AA-01300	
		R941292130	R316531	1N1E29AA-01800	
306A	1111 NW Naito Parkway *NW Naito Parkway	R649812740 R649812730	R508395 R508394	1N1E34BB -00502 1N1E34BD -00805	See attached map
306B	901 NW Naito Parkway 615 NW NAITO PKWY 945 NW Naito Parkway	R850600300 R850600250 R850600150	R518301 R291745 R291743	1N1E34BD -00806 1N1E34BD -00804 1N1E34BD -00802	See attached map
306C	800 NW Sixth Avenue NW COR/ 9TH & NW NAITO NW 2 nd Avenue NW 9 th Ave 510 NW 3rd NW Station Way 800 WI/ NW 6TH AVE 800 WI/ NW 6TH AVE	R180237200 R180220230 R180236410 R180217550 R180236460 R793100300 R180237360 R180237370	R141472 R141023 R141444 R140959 R141452 R533588 R141480 R636518	1N1E34BD -01200 1N1E34BB -00700 1N1E34BB -00800 1N1E34BB -01100 1N1E34BD -00600 1N1E34BB -01306 1N1E34BD -02300 1N1E34BD -02301	See attached map

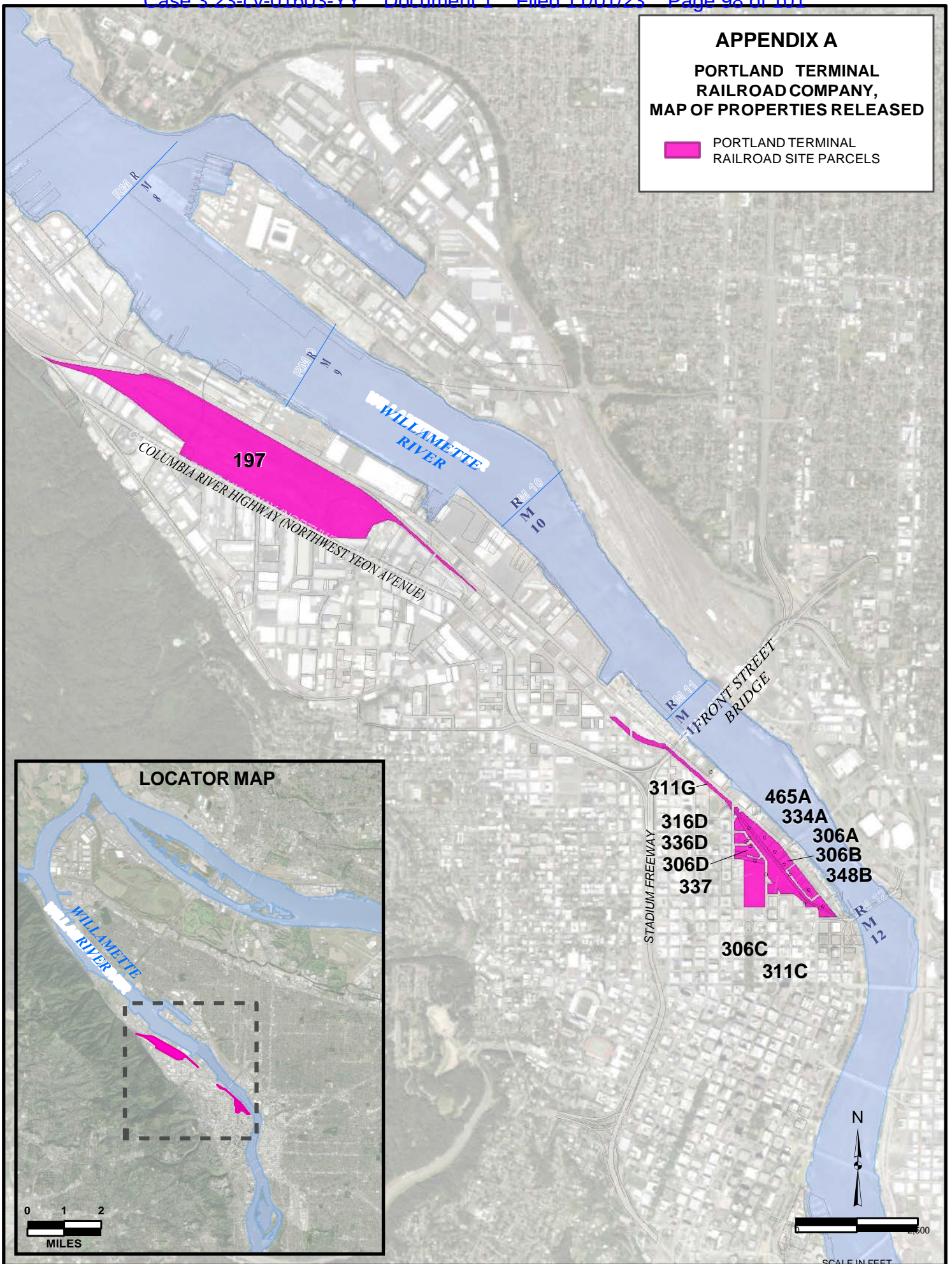
Site ID No.	Street Address	County Tax Parcel ID	Assessor Property ID	State ID	Notes
306D	1020 – 1300 NW 9 th Avenue	R793100100 R793100150 R793100250 R793100350 R793100400	R533584 R533585 R533587 R533589 R533590	1N1E34BB-01302 1N1E34BB-01303 1N1E34BB-01305 1N1E34BB-01307 1N1E34BB-01308	See attached map
311C	Union Station Track 5	R180236400 R180217520 R180217530 R180236470 R180236420 R180237210	R141443 R140955 R140956 R141455 R141447 R140959	1N1E34BB-00900 1N1E34BB-01000 1N1E34BB-01200 1N1E34BD-00700 1N1E34BD-01000 1N1E34BD-01100	See attached map
311G	Union Station Track 5	R883801700 R180222140 R883801800 R883801900 R180220310 R180222110			
316D	1020 – 1300 NW 9 th Avenue (1150 NW 9 th Avenue)	R793100200	R533586	1N1E34BB-01304	See attached map
334A	1207 NW Naito Parkway	R649812750	R508396	1N1E34BB 00501	See attached map
336D	1020 – 1300 NW 9 th Avenue 1020 NW 9 th	R793100050	R533583	1N1E34BB-01301	See attached map
337	715 NW Hoyt Street 715 W/NW Hoyt Street NWC/NW Hoyt & NW Broadway NEC of Hoyt & NW 9th NW 9 th Ave. NW 9 th Ave. NW Hoyt Street NW Broadway NW 9 th Ave. NW Broadway SEC of Lovejoy & NW 9th NW Lovejoy Street SWC/Lovejoy & NW Broadway	R180210240 R180210300	R140726 R140728-INACTIVE ¹ R709060 R709059 R709062 R709061 R709063 R709064 R709065 R709066 R709067 R709068 R709069	1N1E34BC-00100 1N1E34BC-00200 1N1E34BC-00102 1N1E34BC-00101 1N1E34BC-00104 1N1E34BC-00103 1N1E34BC-00105 1N1E34BC-00106 1N1E34BC-00107 1N1E34BC-00108 1N1E34BC-00109 1N1E34BC-00110 1N1E34BC-00111	See attached map (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200)
348B	901 NW Naito Parkway 707-729 NW Naito Pkway 731-779 NW Naito Pkway	R850600350 R850600450 R850600400	R518302 R518304 R518303	1N1E34BD-00807 1N1E34BD-00809 1N1E34BD-00808	See attached map
465A	1207 NW Naito Parkway	R850600050	R291740	1N1E34BB-00600	See attached map

¹ In 2020, Tax Lot 1N1E34BC-00200 was merged into R140726. In 2021, new parcels R709060 – R709069 were created by separating out smaller parcels from Lot 200.

APPENDIX A

PORTLAND TERMINAL RAILROAD COMPANY, MAP OF PROPERTIES RELEASED

 PORTLAND TERMINAL
RAILROAD SITE PARCELS



Appendix A – Schnitzer Steel Industries, Inc.

The properties listed below are identified for Schnitzer Steel Industries, Inc. for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID number	Street Address	County Tax Parcel ID
60	9040 N. Burgard Way	R971350740
61	12005 N. Burgard Road	R971350710, R118300200
141	6529 NW Front Ave.	R961130330
157	5555 N. Channel Ave.	R649840290, R941180390, R941201320
158	5851 N. Lagoon Ave.	R941170730, R941170890
186	4250 NW Front Ave. (former address of relevant portion of Site 186, all of which is now addressed as 4700 NW Front Ave.)	R941200570, R941191240, R941200500, R941191190
203	3200-3340 NW Yeon Ave., 3340-3342 NW 26 th Ave.	R649701500, R941291430, R649701480, R934690010, R941280990, R941280950, R649701460
204	3721 NW Front Ave.	R941200220
205	3641/3683 NW Front Ave.	R941200980
501	3333 NW 35 th Ave.	R941290710, R941291550, R941290720
607	12005 N. Burgard Road	R118300100

Appendix A – Siltronic Corporation

The properties listed below are identified for Siltronic Corporation for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID number	Street Address	County Tax Parcel ID/Alternative Acct. No.
125	7200 NW Front Ave.	R324183/R961130010
125	7200 NW Front Ave.	R324219/R961130480

Appendix A – Sulzer Pumps (US) Inc.

The properties listed below are identified for **Sulzer Pumps (US) Inc.** for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

Site ID number	Street Address	County Tax Parcel ID
220	2800 NW Front Ave.	R941280900
221	2700 NW Front Ave.	R941280300
576	2551 NW 30 th Ave.	R841080010