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EPA Question	Response	Reference
Section 1.0 - Respondent Information		
1. Provide the full legal, registered name and mailing address of Respondent.	Port of Portland 121 NW Everett Street Portland, Oregon 97209-4049	
2. For each person answering these questions on behalf of Respondent, provide: a. full name; b. title; c. business address; and d. business telephone number, electronic mail address, and FAX machine number.	1. Nicole LaFranchise Environmental Project Manager Port of Portland 121 NW Everett Portland, OR 97209 (503) 944-7323 - office (503) 944-7353 - fax Nicole.LaFranchise@portofportland.com 2. Sara Moore Environmental Liability Analyst Port of Portland 121 NW Everett Portland, OR 97209 (503) 944-7033 - office (503) 548-5780 - fax Sara.Moore@portofportland.com 3. Ash Creek Associates Amanda Spencer, Principal Ashleigh Fines, Staff, Geology Group 9615 SW Allen Boulevard, Suite 106 Portland, Oregon 97005-4814 (503) 924-4707 - office (503) 924-4707 - fax aspencer@ashcreekassociates.com afines@ashcreekassociates.com	

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3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, fax number, and, if available, electronic mail address.	Nicole LaFranchise Environmental Project Manager Port of Portland 121 NW Everett Portland, OR 97209 (503) 944-7323 - office (503) 944-7353 - fax Nicole.LaFranchise@portofportland.com	
Section 2.0 - Owner/Operator Information		
4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937-Present). Please note that this question includes any aquatic lands owned or leased by Respondent.	This response addresses the property within the Willamette Cove property formerly owned by the Port. Based on historical ownership and for the purposes of the remedial investigation, the multiple tax lots comprising the upland property known today as Willamette Cove was segmented into three separate parcels: the East Parcel, Central Parcel and West Parcel. The Port is only associated with the Central Parcel as a former owner from 1903 to 1950 and 1903 to 1953, depending on the tax lot. METRO is the current owner of the entire Willamette Cove property. Additional information on the East and West parcels will be included in METRO's 104(e) response. In recent years, the Port has worked with METRO to conduct a remedial investigation and feasibility study (RI/FS) of the property. Because the parcels have been combined for RI/FS purposes, certain portions of this response may refer to all three parcels. The Central Parcel of Willamette Cove as currently owned by METRO consists of approximately 11 acres located on the east bank of the Willamette River between River Miles 6 and 7. It is situated in the SE ¼ of Section 12 of Township 1 North, Range 1 West, Willamette Meridian. A legal description for the Central Parcel is included in the response to Question 13 below.	
a. Currently Owns	Not applicable.	
b. Currently Leases	Not applicable.	
c. Currently Operates	Not applicable.	
d. Historically Has Owned	The Port's ownership of the tax lots comprising the Central Parcel is: tax lots 99 and 124 (from 1903 to 1950) and tax lot 39 (1903 to 1953).	See Deeds at Tab 4.
e. Historically Has Leased	The Port did not lease property for its use. However, the following entities leased property from the Port during the Port's ownership of the Central Parcel: • Western Cooperage – Leased approximately 2.11 acres in the southeastern portion of the Central Parcel for operations associated with their adjacent cooperage from 1913 to 1917. • City of Portland Commission of Public Docks – Leased part of the dry dock facility from 1920 to 1930 for unspecified operations and owned Dry Dock No. 2 from 1921 to 1923 and shared revenue under an	See Deeds at Tab 4.

	agreement with the Port. • Iron Fireman Manufacturing – Leased shop space at the dry dock facility beginning in 1942 "for the duration of the war emergency." Based on available documents, no historical leases of Port property were identified for the Central Parcel from 1937-1953.	
f. Historically Has Operated	Not applicable.	
5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.	The Port is the former owner of the Central Parcel of the Willamette Cove property from 1903 to 1950, and 1903 to 1950 depending on the tax lot. The address for the Central Parcel, along with the Multnomah County Alternative Tax Lot Identification Numbers for each are as follows: Address: Foot of N. Edgewater Street. Location Description: Located along the northeast bank of the Willamette River in the St. John's section of Portland, Oregon. Situated between River Miles 6 and 7 on the Willamette River and is mostly in Section 12 of Township 1 North, Range 1 West, Willamette Meridian. Assessor Description: Tax Lot 39; Tax Lot ID #1N1W1200300; Total Acreage: 8.9; Acquired a portion of the property on May 23, 1903 and October 8, 1903; Sold May 11, 1953. The Multnomah county Alternative Tax Lot Identification Number for Tax Lot 39 is R961120390. Tax Lot 99; Tax Lot ID #1N1W12DB02300; Total Acreage: 0.7; Acquired May 23, 1903 Sold December 11, 1950. The Multnomah county Alternative Tax Lot Identification Number for Tax Lot 99 is R961120990. Tax Lot 124; Tax Lot ID #1N1W12DB02200; Total Acreage: 1.4; Acquired May 23, 1903 Sold December 11, 1950. The Multnomah county Alternative Tax Lot Identification Number for Tax Lot 124 is R961121240. Site Activities: Owner of land and improvements; made in-water dry docks, lifting mechanisms and equipment available as a common-user facility to vessel owners and their ship repair contractors. Oregon law forbade the Port to engage in commercial ship repair activities and specified that dry docks were to be open to common users on an equal opportunity basis.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, *Remedial Investigation Report, Willamette Cove, Portland, Oregon, ECSI No. 2066.* March 11, 2003. • Port of Portland, *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003.
6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:	The Port is a former owner of the Central Parcel. METRO, the current property owner, is preparing its own 104(e) response for the entire Willamette Cove property and should provide additional details related to the East and West Parcels.	
a. partners or joint venturers;	Not applicable.	

b. any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);	See response to Question 6 bullets (f), (g) and (h) below.	
c. any person subleasing land, equipment or space on the Property;	Not applicable.	
d. utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;	City of Portland Portland General Electric	See Deeds at Tab 4.
e. major financiers and lenders;	Not applicable.	
f. any person who exercised actual control over any activities or operations on the Property; g. any person who held significant authority to control any activities or operations on the Property; h. any person who had a significant presence or who conducted significant activities at the Property; and	The following entities held leases at the Central Parcel or utilized the dry dock facilities during the Port's ownership, exercised or had the authority to exercise control over the activities and operations, and/or had a significant presence or conducted significant activities: 1. Western Cooperage Co. 2. City of Portland Commission of Public Docks 3. City of Portland Fire Department 4. Robert McIntosh Engine and Machine Works 5. U.S. Government agencies – vessel owner and operator and arranger of ship repair and shipbuilding-related activities (e.g., vessel conversions and outfitting) during the Great Depression (1930s) and war time (WWI, WWII, and Korean) 6. Helser Machine and Marine Works 7. Iron Fireman Manufacturing 8. Oregon Bridge and Dredge Company 9. St. Helens Ship Company 10. Oregon Shipbuilding Corp. 11. Poole, McGonigle, and Jennings 12. Columbia-Snake River Towing Company 13. Commercial Iron Works 14. Floating Marine Ways 15. Kaiser Company 16. Knappton Towboat Company 17. Port of Astoria 18. Shaver Transportation Company 19. States S.S. Company 20. Smith and Watson Iron Works 21. U.S. Army Corps of Engineers 22. Upper Columbia River Towing Company 23. Willamette Iron & Steel Company/WISCO 24. Albina Engine and Machine Works 25. Northwest Marine Iron Works 26. Marine and Industrial Supplies and Service Company 27. Pacific Marine 28. Columbia Machine Works	See Site Investigation Documents at Tab 9, specifically: • Ash Creek Associates, 2006. *Reported Outfalls, Willamette Cove Upland Facility Memorandum.* May 17, 2006. • Hart Crowser, 2000. *Existing Data / Site Summary Report, Willamette Cove, Portland, Oregon.* (Lake Oswego, Oregon: November 8, 2000). • Port of Portland, *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003.

29. Western Transportation Company
30. Foss Launch & Tug Company
31. The Mirene Company
32. James Griffiths & Sons, Inc.
33. Shepard Towing Company
34. Consolidated Builders, Inc.
35. Russell Towboat & Moorage Company
36. West Coast Trans-Oceanic Steamship Line
37. H.G. St. Helen
38. Collins Concrete & Steel Pipe Company
39. Willamette Tug & Barge Company
40. Tidewater-Shaver Barge Line
41. Portland Tug & Barge Co.
42. General Construction Company
43. Captain Carl V. Shoemaker
44. Inland Navigation Company
45. Columbia Marine Shipyard
46. Leach Towboat Company
47. Long Bell Lumber Company
48. L.S. Baier & Associates
49. State Highway Commission
50. W.G. Cooney
51. Sause Brothers
52. Rogue River Timber Company
53. W.R. Chamberlin & Co.
54. Weyerhaueser S.S. Co.
55. Interocean Line
56. MacCormac Snow
57. John Rakke Motors
58. Pacific Atlantic S.S. Company
59. Commercial Marine Industries
60. Gunderson Bros.
61. Pacific Bridge Co.
62. Devine & Zimmerman Diving Co.
63. R. Lendton
64. Columbia Shipbuilding Co.
65. Olympian Dredging Company
66. Supple & Martin Lightering Company
67. Steel Tank & Pipe Company
68. St. Helens Towing Company
69. Hosford Transportation Company
70. Schafer Bros. S.S. Line
71. Swigert-Hart Co. Inc.

	72. Diesel Towing Company 73. America Transportation Company 74. Columbia Construction Company 75. General Steamship Company 76. Crown Willamette Paper Company 77. James A.C. Tait & Co. 78. McCormick & Co. 79. Pacific Building Materials Co. 80. Standard Oil Company 81. Hammond Shipping Company 82. Gilpin Construction Company 83. Tidewater Transportation Company 84. General Petroleum Corp. 85. Coastwise Line 86. Columbia River Transportation Company 87. Alaska S.S. Company 88. Jones Towboat Company 89. Roamer Tug & Lightering Company 90. Oceanic Fishery Company 91. Astoria Marine Construction Company 92. American Mail Line 93. Arrow Tug & Barge Company 94. Astoria North Beach Ferry Company In addition, multiple other private or foreign vessel owners used the St. Johns Dry Docks; see Dry Dock Logs for additional information.	
i. government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.	Port of Portland (1903-1953) City of Portland Commission of Public Docks U.S. Government	
7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest: when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).	The Port historically owned the Central Parcel for the periods described above. Tax lots 99 and 124 were sold to Portland Manufacturing Company in 1950 and tax lot 39 was sold to Harold Scritsmier in 1953.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, *Remedial Investigation Report, Willamette Cove, Portland, Oregon, ECSI No. 2066.* March 11, 2003. • Port of Portland, *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility,*

		Portland, Oregon. September 19, 2003.
8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.	The Port is not the current owner or operator at the Facility. The Willamette Cove property is currently owned by METRO.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, *Remedial Investigation Report, Willamette Cove, Portland, Oregon, ECSI No. 2066.* March 11, 2003. • Port of Portland, *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003.
9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.	No. The available historical documents pertaining to the acquisition of the Central Parcel by the Port do not provide any information on prior knowledge of hazardous substance, waste, or material disposed of on, or at the property in 1903.	
10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above including, but not limited to, the following entities believed to have owned one or more of your Properties: a. City of Portland b. Freightliner LLC c. Oregon Shipbuilding Corporation d. Shipyard Commerce Center LLC e. Union Pacific Railroad; and f. West Coast Terminal Company For each prior owner, further identify, if known and if relevant, and provide copies of any documents you may have regarding: i. the dates of ownership ii. all evidence showing that they controlled access to the Property; and	Former owners of the Central Parcel (prior to METRO's current ownership) include: • Hartman, Thompson, and Powers – Tax Lots 39, 99 and 124, prior to 5/23/1903 • (b) (6) et al. – Tax Lot 39, prior to 10/8/1903 • Port of Portland – Tax Lot 39 (1903-1953) • Port of Portland – Tax Lots 99 and 124 (1903-1950) • Portland Manufacturing Company – Tax Lots 99 and 124 (1950-1964) • (b) (6) – Tax Lot 39 (1953-1981) • Brand-S Lumber Mills – Tax Lot 99 (1977-1979) • Menasha Corp. – Tax Lot 124 (1978-1980) • Fibron – Tax Lot 124 (1979 quitclaim to PDC) • City of Portland Portland Development Commission – Tax Lot 39 (1981-1996); Tax Lot 99 (1979-1996) and Tax Lot 124 (1980-1996) • Trust for Public Land - Tax Lots 39, 99 and 124 (1996) • State of Oregon DSL - filled river bank and bed adjacent to property (1859-1990)	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, 2000. *Existing Data / Site Summary Report, Willamette Cove, Portland, Oregon.* (Lake Oswego, Oregon: November 8, 2000). • Port of Portland, *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003. See Deeds at Tab 4. See Dockage Compilation Sheets and Dry Dock Logs contained within Contractor Information at Tab 3.

iii. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.	None of the entities listed in bullets (b) through (f) Question 10 previously owned the Willamette Cove Central Parcel, but as mentioned, the City of Portland Commission of Public Docks historically owned Dry Dock 2 and Oregon Shipbuilding Corporation was an operator of the dry-dock facility. Periods of ownership are reflected by the deeds, which are attached at Tab 3. No other documented evidence was located.	
11. Identify all current or prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above including, but not limited to, the following entities: a. Beall Pipe, Inc.; b. Benson Industries, Inc.; c. Cargill, Inc.; d. Cascade General; e. Cascade West; f. Chevron USA; g. Classical Chinese Garden Trust; h. Hunt Foods, Inc.; i. Kaiser; j. Multnomah County Sheriff's Office; k. Pacific Molasses Company; l. Pacific Pine; m. Port of Cascade Locks.; n. Portland Municipal Airport; o. Safety Kleen; p. Shaver Transportation Company; q. Speed Towing; r. St. John Auto Wrecking Yard; s. Thermo Pressed Laminates, Inc.; t. Tristar Transload, Inc.; u. U.S. Maritime Commission; v. Ultraboard; w. War Assets Administration; x. West Coast Paper Company; y. Western Transportation.; and z. Willamette Iron and Steel Corporation. For each such operator, further identify, if known and if relevant, and provide copies of any documents you may have regarding: i. the dates of operation; ii. the nature of prior operations at the property; iii. all evidence that they controlled access to the property; and iv. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they operated on the	Of the entities listed in (a) through (z) of Question 11, only Kaiser, Shaver Transportation, Western Transportation and Willamette Iron and Steel Company are known to have been prior operators of the Willamette Cove Central Parcel, as explained below. Currently available records reflect the following prior operators at the Central Parcel: 1. Western Cooperage Co. i. Leased 2.11 acres of the Central Parcel for cooperage operations from Sept. 3, 1913 to Sept. 13, 1919. ii. Owned and operated cooperage manufacturing plant on the adjacent Western Parcel. iii. City Directory, Sanborn Fire Insurance Maps (Port, 2000) iv. No documented evidence of releases was identified. 2. City of Portland Commission of Public Docks i. Lease for use of part of dry dock from Dec. 1, 1920 to Dec. 1, 1930. ii. Nature of prior operations is unknown. iii. Former owner of Dry Dock 2 and held lease for dry dock operation from the Port iv. No documented evidence of releases was identified. 3. City of Portland Fire Department i. At least 1943 to 1945 ii. Contracted for ship repair. iii. Dockage Compilation Sheets, Dry Dock Logs iv. No documented evidence of releases was identified. 4. Robert McIntosh Engine and Machine Works i. At least 1903 through 1931 ii. Conducted ship repair activities iii. Dry Dock Logs iv. No documented evidence of releases was identified. 5. U.S. Government i. Frequent use of the facilities from the First World War, through the Depression, through World War II and during the Korean War (1950-1953) by Emergency Fleet Corporation (WWI); U.S. Shipping Board (WWI); U.S. Engineers and Lighthouse Department (1930s); National Recovery Administration (1930s); Civil Works Administration (1930s); Works Progress Administration (1930s); U.S. Navy (WWII and Korean War); War Shipping Commission (WWII); and U.S. Bureau of Ships (WWII): U.S. Coast Guard (1947) ii. Had US owned vessels converted, repaired and outfitted at the facility, arranged for others vessels to be worked on at the facility, and had vessels conditioned for lay-up or sale. iii. Controlled vessels, arranged for ship repairs, and controlled shipping activities during WWI and WWII (Port, 2003). iv. No documented evidence of releases was identified.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, 2000. *Existing Data / Site Summary Report, Willamette Cove, Portland, Oregon.* (Lake Oswego, Oregon: November 8, 2000). • Port of Portland, *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003. See Dockage Compilation Sheets and Dry Dock Logs contained within Contractor Information at Tab 3. See Agreements at Tab 1. See Contractor Space Requirements contained within Contractor Information at Tab 3. See Deeds at Tab 4.

Property.	6. Helser Machine and Marine Works i. ~1930 through 1945 ii. Conducted ship repair activities. iii. Dry Dock Logs iv. No documented evidence of releases was identified. 7. Iron Fireman Manufacturing i. 1942 through ~1945 ii. Leased shop space for manufacturing heavy machinery. iii. Port Agreements iv. No documented evidence of releases was identified. 8. Oregon Bridge and Dredging Company i. At least 1931 to 1932 ii. Conducted ship repair activities. iii. Dry Dock Logs iv. No documented evidence of releases was identified. 9. St. Helens Ship Company i. At least 1931 to 1933 ii. Contracted for ship repair. iii. Dry Dock Logs iv. No documented evidence of releases was identified. 10. Oregon Shipbuilding Corp. i. 1941 through 1953 ii. Contracted for ship repair and/or ship outfitting. iii. Dockage Compilation Sheets, Dry Dock Logs iv. No documented evidence of releases was identified. 11. Poole, McGonigle, and Jennings i. At least 1943 through 1945 ii. Conducted ship repair and outfitting activities during WW II. iii. Contract agreement with the Port for lease of tools (mentions War Shipping Administration); Dockage Compilation Sheets, Dry Dock Logs iv. No documented evidence of releases was identified. 12. Columbia-Snake River Towing Company i. At least 1944 to 1947 ii. Owned vessels and conducted ship repair activities. iii. Dockage Compilation Sheets; Dry Dock Logs iv. No documented evidence of releases was identified. 13. Commercial Iron Works i. At least 1931 to 1945 ii. Conducted ship repair and outfitting activities. iii. Dockage Compilation Sheets; Dry Dock Logs iv. No documented evidence of releases was identified. 14. Floating Marine Ways i. At least 1941 to 1953	

ii. Conducted ship repair and outfitting activities.
iii. Dockage Compilation Sheets; Dry Dock Logs
iv. No documented evidence of releases was identified.

15. Kaiser Company
    i. At least 1943 to 1946
    ii. Conducted ship repair and outfitting activities.
    iii. Dockage Compilation Sheets, Port records (Port, 2003)
    iv. In 1943 "fuel oil escaping from vessels at the dry docks [was] attributed to negligence or errors on the carriers" built by Kaiser.
16. Knappton Towboat Company
    i. At least 19436 to 1949
    ii. Owned vessels and conducted ship repair activities.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
17. Port of Astoria
    i. At least 1945
    ii. Contracted for ship repair.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
18. Shaver Transportation Company
    i. At least 1942 to 1951
    ii. Owned vessels and conducted ship repair activities.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
19. States S.S. Company
    i. At least 1935 through 1951
    ii. Conducted ship repair activities. Occupied space for paint storage.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
20. Smith and Watson Iron Works
    i. Unknown dates.
    ii. Conducted ship repair activities.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
21. U.S. Army Corps of Engineers
    i. At least 1933 to 1953
    ii. Owned dredge plant, conducted ship repair activities, and removed sunken vessel.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
22. Upper Columbia River Towing Company
    i. At least 1941 to 1953
    ii. Owned vessels and conducted ship repair activities.
    iii. Dockage Compilation Sheets, Dry Dock Logs

iv. No documented evidence of releases was identified.

23. Willamette Iron & Steel Company/WISCO (now Guy F. Atkinson or ATKN)
    i. 1907, at least 1942 through 1953
    ii. Conducted ship repair activities. Occupied space for miscellaneous stores.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
24. Albina Engine and Machine Works
    i. At least 1932 to 1953
    ii. Conducted ship repair activities. Occupied space for electrical storage, stores, machinist tool storage, tool room, and paint and oil storage.
    iii. Dockage Compilation Sheets, Dry Dock Logs, Contractor Space Requirements (October 1951)
    iv. Port Records (Port, 2003)
    v. No documented evidence of releases was identified.
25. Northwest Marine and Iron Works
    i. At least 1943 to 1953
    ii. Conducted ship repair activities. Occupied space for tool and equipment storage, paints storage, and carpenter shop.
    iii. Dockage Compilation Sheets, Dry Dock Logs, Contractor Space Requirements (October 1951)
    iv. No documented evidence of releases was identified.
26. Marine and Industrial Supplies and Service Company
    i. At least 1951
    ii. Conducted ship repair activities. Occupied space for miscellaneous stores, and paint and oil storage.
    iii. Contractor Space Requirements (October 1951)
    iv. No documented evidence of releases was identified.
27. Pacific Marine
    i. At least 1950 to 1951
    ii. Conducted ship repair activities. Occupied space for sandblast equipment.
    iii. Dry Dock Logs, Contractor Space Requirements (October 1951)
    iv. No documented evidence of releases was identified.
28. Columbia Machine Works
    i. At least 1947
    ii. Conducted ship repair activities.
    iii. Dockage Compilation Sheets
    iv. No documented evidence of releases was identified.
29. Western Transportation Company
    i. At least 1942 to 1953
    ii. Owned vessels and conducted ship repair activities.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
30. Foss Launch & Tug Company
    i. At least 1947
    ii. Owned vessels and conducted ship repair activities.
    iii. Dockage Compilation Sheets

iv. No documented evidence of releases was identified.

31. The Mirene Company
    i. At least 1943 to 1947
    ii. Owned vessels and conducted ship repair activities.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
32. James Griffiths & Sons Inc.
    i. At least 1948
    ii. Owned vessel and contracted for ship repair.
    iii. Dockage Compilation Sheets
    iv. No documented evidence of releases was identified.
33. Shepard Towing Company
    i. At least 1943 to 1950
    ii. Owned vessels and conducted ship repair activities.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
34. Consolidated Builders, Inc.
    i. At least 1948
    ii. Conducted ship repair activities.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
35. Russell Towboat & Moorage Company
    i. At least 1942 to 1948
    ii. Owned vessels and conducted ship repair activities.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
36. West Coast Trans-Oceanic Steamship Line
    i. At least 1948
    ii. Contracted for ship repair.
    iii. Dockage Compilation Sheets
    iv. No documented evidence of releases was identified.
37. H.G. St. Helen
    i. At least 1948
    ii. Owned vessel and conducted ship repair activities.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
38. Collins Concrete & Steel Pipe Company
    i. At least 1948
    ii. Owned vessels and conducted ship repair activities.
    iii. Dockage Compilation Sheets
    iv. No documented evidence of releases was identified.
39. Willamette Tug & Barge Company
    i. At least 1948 to 1953

ii. Owned vessels and conducted ship repair activities.
iii. Dockage Compilation Sheets
iv. No documented evidence of releases was identified.

40. Tidewater-Shaver Barge Line
    i. At least 1948 to 1953
    ii. Owned vessels and contracted for ship repair.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
41. Portland Tug & Barge Company
    i. At least 1933 to 1952
    ii. Owned vessels and contracted for ship repair.
    iii. Dockage Compilation Sheets
    iv. No documented evidence of releases was identified.
42. General Construction Company
    i. At least 1933 to 1951
    ii. Owned vessels and conducted ship repair activities.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
43. Captain Carl V. Shoemaker
    i. At least 1950
    ii. Owned vessel and contracted for ship repair.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
44. Inland Navigation Company
    i. At least 1940 to 1950
    ii. Owned vessels and conducted ship repair activities.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.
45. Columbia Marine Shipyard
    i. At least 1950
    ii. Owner of a dry dock and contracted for its repair.
    iii. Dockage Compilation Sheets
    iv. No documented evidence of releases was identified.
46. Leach Towboat Company
    i. At least 1950
    ii. Owned vessel and conducted ship repair activities.
    iii. Dockage Compilation Sheets
    iv. No documented evidence of releases was identified.
47. Long Bell Lumber Company
    i. At least 1951
    ii. Owned vessel and contracted for ship repair.
    iii. Dockage Compilation Sheets, Dry Dock Logs
    iv. No documented evidence of releases was identified.

48. L.S. Baier & Associates
    i. At least 1951
    ii. Owned vessel and conducted ship repair activities.
    iii. Dockage Compilation Sheets
    iv. No documented evidence of releases was identified.
49. State Highway Commission
    i. At least 1951
    ii. Owned vessel and contracted for ship repair.
    iii. Dockage Compilation Sheets
    iv. No documented evidence of releases was identified.
50. W.G. Cooney
    i. At least 1951
    ii. Owned vessel and contracted for ship repair.
    iii. Dockage Compilation Sheets
    iv. No documented evidence of releases was identified.
51. Sause Brothers
    i. At least 1951
    ii. Owned vessels and contracted for ship repair.
    iii. Dockage Compilation Sheets
    iv. No documented evidence of releases was identified.
52. Rogue River Timber Company
    i. At least 1951
    ii. Owned vessel and contracted for ship repair.
    iii. Dockage Compilation Sheets
    iv. No documented evidence of releases was identified.
53. W.R. Chamberlin & Co.
    i. At least 1945
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
54. Weyerhaeuser S.S. Co.
    i. At least 1943 to 1946
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
55. Interocean Line
    i. At least 1946
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
56. MacCormac Snow
    i. At least 1947
    ii. Conducted ship repair activities.

iii. Dry Dock Logs
iv. No documented evidence of releases was identified.

57. John Rakke Motors
    i. At least 1947
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
58. Pacific Atlantic S.S. Company
    i. At least 1943 to 1950
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
59. Commercial Marine Industries
    i. At least 1952
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
60. Gunderson Bros.
    i. At least 1952
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
61. Pacific Bridge Co.
    i. At least 1942 to 1952
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
62. Devine & Zimmerman Diving Co.
    i. At least 1952
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
63. R. Lendton
    i. At least 1950
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
64. Columbia Shipbuilding Company
    i. At least 1943
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
65. Olympian Dredging Company

i. At least 1931
ii. Conducted ship repair activities.
iii. Dry Dock Logs
iv. No documented evidence of releases was identified.

66. Supple & Martin Lightering Company
    i. At least 1931
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
67. Steel Tank & Pipe Company
    i. At least 1933
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
68. St. Helens Towing Company
    i. At least 1933
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
69. Hosford Transportation Company
    i. At least 1933
    ii. Conducted ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
70. Schafer Bros. S.S. Line
    i. At least 1935
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
71. Swigert-Hart Co. Inc.
    i. At least 1935
    ii. Either performed or contracted for ship repair activities.
    iii. Dry dock logs
    iv. No documented evidence of releases was identified.
72. Diesel Towing Company
    i. At least 1935 to 1936
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
73. America Transportation Company
    i. At least 1935
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs

iv. No documented evidence of releases was identified.

74. Columbia Construction Company
    i. At least 1935 to 1942
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
75. General Steamship Company
    i. At least 1935
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
76. Crown Willamette Paper Company
    i. At least 1935
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs.
    iv. No documented evidence of releases was identified.
77. James A.C. Tait & Co.
    i. At least 1937
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
78. McCormick & Co.
    i. At least 1937
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
79. Pacific Building Materials Co.
    i. At least 1939 to 1942
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
80. Standard Oil Company
    i. At least 1940 to 1941
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
81. Hammond Shipping Company
    i. At least 1940
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
82. Gilpin Construction Company
    i. At least 1940 to 1943

	ii. Either performed or contracted for ship repair activities. iii. Dry Dock Logs iv. No documented evidence of releases was identified. 83. Tidewater Transportation Company i. At least 1941 to 1942 ii. Either performed or contracted for ship repair activities. iii. Dry Dock Logs iv. No documented evidence of releases was identified. 84. General Petroleum Corp. i. At least 1942 ii. Either performed or contracted for ship repair activities. iii. Dry Dock Logs iv. No documented evidence of releases was identified. 85. Coastwise Line i. At least 1942 ii. Either performed or contracted for ship repair activities. iii. Dry Dock Logs iv. No documented evidence of releases was identified. 86. Columbia River Transportation Company i. At least 1942 ii. Either performed or contracted for ship repair activities. iii. Dry Dock Logs iv. No documented evidence of releases was identified. 87. Alaska S.S. Company i. At least 1942 ii. Either performed or contracted for ship repair activities. iii. Dry Dock Logs iv. No documented evidence of releases was identified. 88. Jones Towboat Company i. At least 1942 ii. Either performed or contracted for ship repair activities. iii. Dry Dock Logs iv. No documented evidence of releases was identified. 89. Roamer Tug & Lightering Company i. At least 1942 ii. Either performed or contracted for ship repair activities. iii. Dry Dock Logs. iv. No documented evidence of releases was identified. 90. Oceanic Fishery Company i. At least 1942 ii. Either performed or contracted for ship repair activities. iii. Dry Dock Logs iv. No documented evidence of releases was identified.	

91. Astoria Marine Construction Company
    i. At least 1942
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
92. American Mail Line
    i. At least 1942
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
93. Arrow Tug & Barge Company
    i. At least 1942
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
94. Astoria North Beach Ferry Company
    i. At least 1942
    ii. Either performed or contracted for ship repair activities.
    iii. Dry Dock Logs
    iv. No documented evidence of releases was identified.
95. Portland Manufacturing Company
    i. 1950 through 1963 (Tax Lots 99 and 124)
    ii. Owned and operated a plywood mill.
    iii. Deed records, Existing Data / Site History Report (Port, 2000) and Supplemental PA (Port, 2003)
    iv. No documented evidence of releases was identified.
96. Plylock Corporation
    i. 1950 through 1963
    ii. Owner and operator of northwestern most corner of Central parcel. Stored wood waste during earlier years and later became vacant.
    iii. Deed records
    iv. No documented evidence of releases was identified.
97. Scritsmier Co.
    i. 1953 through 1990
    ii. Owned and operated a sawmill until the early 1960's.
    iii. Deed records
    iv. No documented evidence of releases was identified.

The following businesses were located in the vicinity and may have operated on the Central Parcel as well:

98. L&W Woodworking
    i. 1960 through 1968
    ii. Woodworking business.
    iii. City directories, Sanborn Fire Insurance maps (Port, 2000)

	iv. No documented evidence of releases was identified. 99. Colligan and Moore i. 1962 ii. Unknown. iii. Chain-of-title and deed records (Port, 2000) iv. No documented evidence of releases was identified. 100. Export Booms, Inc. i. 1965 through 1970 ii. Unknown activities. iii. City directories, Sanborn Fire Insurance maps (Port, 2000) iv. No documented evidence of releases was identified. 101. Red Cedar Lumber Co. i. 1968 through 1970 ii. Unknown activities. iii. City directories, Sanborn Fire Insurance maps (Port, 2000) iv. No documented evidence of releases was identified. 102. Connolly International Sales Co. i. 1965 through 1970 ii. Unknown activities. iii. City directories, Sanborn Fire Insurance maps (Port, 2000) iv. No documented evidence of releases was identified. 103. Schlesser Sales Co. i. 1968 through 1972 ii. Unknown activities. iii. City directories, Sanborn Fire Insurance maps (Port, 2000) iv. No documented evidence of releases was identified. 104. Waxwing Cedar Products i. 1965 through 1970 ii. Unknown activities. iii. City directories, Sanborn Fire Insurance maps (Port, 2000) iv. No documented evidence of releases was identified. 105. Richard J. Olsen Log Rafting Inc. i. 1972 ii. Unknown activities. iii. City directories, Sanborn Fire Insurance maps (Port, 2000) iv. No documented evidence of releases was identified.	
12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease	Not applicable.	

obtained.		
Section 3.0 - Description of Each Property		
13. Provide the following information about each Property identified in response to Question 4:	See responses to bullets (a) through (m) below.	
a. property boundaries, including a written legal description;	A legal description of the Central Parcel is included in the deeds for the property, which are located at Tab 4.	See Deeds at Tab 4.
b. location of underground utilities (telephone, electrical, sewer, water main, etc.);	No underground pipelines are known to have been owned, controlled or operated by the Port during its ownership of the Central Parcel. The Property was historically served by city water, sewer, electrical power, and telephone service, although the former locations of these utilities are unknown.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, *Remedial Investigation Report, Willamette Cove, Portland, Oregon, ECSI No. 2066.* March 11, 2003. • Ash Creek Associates, 2006. *Reported Outfalls, Willamette Cove Upland Facility Memorandum.* May 17, 2006.
c. location of all underground pipelines whether or not owned, controlled or operated by you;	No underground pipelines are known to have been owned, controlled or operated by the Port on the Central Parcel. A City of Portland Combined Sewer Outfall (CSO 49) runs northeast/southwest through the center of tax lot 99 and a portion of 124. The location of the CSO is identified on Figure 3 of the RI Report. In 2000, the City also mapped one private outfall in Tax Lot 124 (WP-190). The outfall and the associated system are no longer observable at the Facility. Historically, stormwater runoff would have been directed to the river. A prior investigation conducted by EMCON for Grayco Resources, an entity interested in buying the property, found that a geophysical survey of the Facility identified sumps with drainage connections to the riverbank. The site investigations conducted by Hart Crowser did not reveal any evidence of such sumps or appurtenances.	See Site Investigation Documents at Tab 9, specifically: • Ash Creek Associates, 2006. *Reported Outfalls, Willamette Cove Upland Facility Memorandum.* May 17, 2006. • Hart Crowser, 2000. *Existing Data / Site Summary Report, Willamette Cove, Portland, Oregon.* (Lake Oswego, Oregon: November 8, 2000). • Hart Crowser, *Remedial Investigation Report, Willamette Cove, Portland, Oregon, ECSI No. 2066.* March 11, 2003.
d. surface structures (e.g. buildings, tanks, pipelines, etc.);	Between 1903 and 1918, the only upland feature was a power house on the hillside north of the railroad tracks. The powerhouse had a 5,000-gallon steel above ground storage tank (AST) for oil (Sanborn, 1924). These structures were not located on Port property, but directly north of Tax Lot 39. In 1918, a coaling dock with a rail spur was constructed about 100 feet from the riverbank in the northwestern portion of the Central Parcel (see also response to Question 30). By 1924, fill was placed between the railroad tracks and Dry Dock No.1, creating the current 200-foot wide upland portion. Most of the buildings ("shops") were then constructed. The 1924 Sanborn shows: storage buildings; blacksmith, pipe, woodworking, and machine shops; on-	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, 2000. *Existing Data / Site Summary Report, Willamette Cove, Portland, Oregon.* (Lake Oswego, Oregon: November 8, 2000). • Port of Portland, *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary*

	site restaurant; an automobile garage; and pattern loft. Another restaurant was also built by the Port along Edgewater Street in 1923 (the "Edgewater Lunch" per a 1939 directory). By 1924, the Power House was no longer being used and the coaling dock was being used for machinery storage. Between 1924 and 1932, the area between the former coaling dock and the tracks was filled, creating the current northwestern portion of the Central Parcel. The 1932 Sanborn shows construction of a warehouse on this new land and an additional blacksmith shop at the east end of the facility. A paint shed was added by 1939 (shown on an aerial photograph and identified on the 1950 Sanborn map). Around that time, the northwestern portion of the parcel was used for storage. Between 1939 and 1948, the lawn at the southeast end of the parcel was converted to a parking lot and the former powerhouse was removed.	*Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003.
e. over-water structures (e.g., piers, docks, cranes, etc.);	The first dry dock (Dry Dock No. 1) was 82 feet wide and 468 feet long, opened to the west, had a 10,000-ton lifting capacity, and was situated ~200 feet from the riverbank. Two wharves along the dry dock extended westward ~280 and 740 feet from the dry dock. Shore access to Dry Dock No. 1 was on a 22-foot wide pier. A second dry dock (Dry Dock No. 2) was constructed by the City of Portland Commission of Public Docks in 1921 and positioned along the south side of Dry Dock No.1. The new dry dock was 94 feet wide by 492 feet long, and had a 15,000-ton lifting capacity. A third wharf extended about 100 feet westward. Between 1924 and 1932, the wharf closest to the river bank (the 740-foot long wharf) was reconstructed, with the new wharf being shorter (~400-feet long) and straightened to be parallel to the other wharfs. In December 1950, the Port sold Tax Lots 99 and 124 to the Portland Manufacturing Co. In May 1953, the Port sold Tax Lot 39 to Harold Scritsmier.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, 2000. *Existing Data / Site Summary Report, Willamette Cove, Portland, Oregon.* (Lake Oswego, Oregon: November 8, 2000). • Port of Portland, *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003.
f. dry wells;	No known drywells exist at the Willamette Cove Central Parcel either currently or historically.	
g. treatment or control devices (e.g., surface water. air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);	No historical records were identified that indicate treatment or control devices on the Facility.	
h. groundwater wells, including drilling logs;	Following Port ownership, seven wells were installed as a part of the remedial investigation at the site in January 2002; drilling logs for these wells are located in Appendix E of the RI Report. No records of wells installed at the Central Parcel during the Port's ownership were identified.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, *Remedial Investigation Report, Willamette Cove, Portland, Oregon, ECSI No. 2066.* March 11, 2003.
i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;	A City of Portland combined sewer system drains into Willamette Cove through CSO Outfall 49 at Tax Lot 99. Outfall 49 does not drain the Central Parcel or any portion of the Willamette Cove property. According to City of Portland records, CSO 49 was installed in 1945, is approximately 15 inches in diameter, and drains most of the residential area on the bluff above the Central Parcel. City plans reflect that CSO 49 originally extended into the river with a creosote-treated wooden pipe. The City reportedly separated the neighborhood sewers in 1997, and today CSO 49 discharges substantially more stormwater.	See Site Investigation Documents at Tab 9, specifically: • Ash Creek Associates, 2006. *Reported Outfalls, Willamette Cove Upland Facility Memorandum.* May 17, 2006. • Hart Crowser, 2000. *Existing Data / Site Summary*

	In its records, the City of Portland documented five historical outfalls on the Willamette Cove property. One outfall, designated as WR-190, was identified on the Central Parcel on Tax Lot 124. In 2005, the Port and METRO conducted a detailed investigation of the Willamette Cove shoreline to assess the reported presence of the five outfalls (identified in City of Portland records as WR-189 through WR-193). The results of this investigation are detailed in a May 17, 2006 memorandum prepared by Ash Creek Associates and included in the attachments for this response (see also METRO's 104(e) response for Willamette Cove). Based on a review of Port files, three site walks and a boat reconnaissance, the reported private outfall at the Central Parcel (WR-190) appears to correspond with a 6-inch concrete pipe that is currently embedded in the riverbank and filled with soil. It is unknown whether this was ever a historical outfall or, if so, what property it drained. No upland source drains have been observed in the area of this outfall.	*Report, Willamette Cove, Portland, Oregon.* (Lake Oswego, Oregon: November 8, 2000). • Hart Crowser, *Remedial Investigation Report, Willamette Cove, Portland, Oregon, ECSI No. 2066.* March 11, 2003.
j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed; including, but not limited to, the tanks associated with the St. Johns Auto Wrecking Yard;	The Port is not aware of any underground injection control wells on the Willamette Cove property. The Port did not historically own any USTs on the Central Parcel. The St. Johns Auto Wrecking Yard is not affiliated or proximal (either currently or historically) to the Willamette Cove property.	
k. *any and all major additions, demolitions or* changes on, under or about the Property, its physical structures or to the Property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;	Dry Dock No. 1 was constructed in 1904 and Dry Dock No. 2 constructed in 1921. By 1924, fill was placed between the railroad tracks and Dry Dock No.1, created the current 200-foot wide upland portion. Between 1924 and 1932, the area between the former coaling dock and the tracks was filled, creating the current northwestern portion of the Central Parcel. Between 1924 and 1932, the wharf closest to the river bank (the 740-foot long wharf) was reconstructed, with the new wharf being shorter (~400-feet long) and straightened to be parallel to the other wharfs. The St. Johns Dry Docks were closed in 1953. Dry Dock No. 2, the former City CPD dock, was relocated to Swan Island in February, and Dry Dock No. 1 followed in July 1953. During the Port's ownership, no other major additions, demolitions, or changes to the Central Parcel were identified for the relevant period for the 104(e) request. See also response to Question 30.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, 2000. *Existing Data / Site Summary Report, Willamette Cove, Portland, Oregon.* (Lake Oswego, Oregon: November 8, 2000). • Port of Portland, *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003.
l. all maps and drawings of the Property in your possession; and	Drawings identified relevant to the Central Parcel are included as follows: 1. Figures 1 through 3 (ACA, 2005) 2. Figures 1 through 4 (ACA, 2006) 3. Figures 1 through 5 (ACA/Newfields, 2006) 4. Figures 1.2-1, 1.2-2, 2.2-1, 2.5-1, 2.7-1, 2.8-1, 2.8-2, 2.8-3, 2.8-4, 2.8-5, 3.8-1, and 3.8-2 (ACA/Newfields, 2006a) 5. Figures 1 through 4 (ACA/Newfields, 2006b) 6. Figures: 1-1, 1-2, 3-1, 4-1, and 5-1 (ACA/Newfields, 2006c) 7. Figures: 1.2-1, 1.2-2, 2.2-1, 2.5-1, 2.7-1, 2.8-1, 2.8-2, 2.8-3, 2.8-4, 2.8-5, 2.8-6, 2.8-7, 4.3-1, 5.1-1, 5.1-2, and 5.1-3 (ACA/Newfields, 2006d) 8. Figures 1 through 4 (ACA/Newfields, 2007a)	See Drawings at Tab 5. See Environmental Assessments at Tab 8, specifically: • Ash Creek Associates /Newfields, 2006a. *Draft Risk Assessment Work Plan, Willamette Cove Upland Facility.* May 12, 2006. • Ash Creek Associates /Newfields, 2006c. *Draft: Baseline Ecological Risk Assessment, Willamette Cove Upland Facility.* Prepared for the Port of Portland. June 2006.

	9. Figures 1 through 4 (ACA/Newfields, 2007c) 10. Figures 1 through 2 (BBL/ACA/Newfields, 2005) 11. Figures 1 through 2 (BBL/ACA/Newfields, 2005a) 12. Figures 1 through 5 (BBL/ACA/Newfields, 2005b) 13. Figures 1 through 2 (BBL/ACA/Newfields, 2006) 14. Figures 1 through 5 (BBL/ACA/Newfields, 2006b) 15. Figures 1 through 11 and Drawings 1 through 8 (E&E, 2002) 16. Figures 1 through 2 (Hahn, 1999) 17. Figures 1 through 6 (Hart Crowser, 2000) 18. Figures 1 through 10 (Hart Crowser, 2002) 19. Figures 1 through 3 (POP, 2003) 20. Drawing WR 38-2 (1938) 21. Floating Dry Dock Operating Chart, Name Plates and Testing Schedule (April 1944) 22. Floating Dry Dock General Plan (March 4, 1944) 23. City of Portland Commission of Public Docks, East Side Harbor Survey, Western Cooperage Co., Port of Portland Dry Docks (February 17, 1934) 24. Drawing WR 38-1-1/1 (1938) 25. Port of Portland, Dry Dock Property and Building Locations (1937) 26. Drawing MP DD 1937-4001 1/6 (1937) 27. Port of Portland, Fastening Steel Towers to Wooden Pontoons, Dry Dock No. 2 (August 1937) 28. Port of Portland, General Framing Construction Steel Towers, Dry Dock #2 (August 1937) 29. Port of Portland, Plating Details Steel Towers, Dry Dock No. 2 (August 1937) 30. Port of Portland, Construction & Welding Details Steel Towers, Dry Dock No. 2 (November 1938) 31. Drawing MP DD 1937-4001 6/6 (1937) 32. Drawing MP DD 1937-4002 1/2 (1937) 33. Drawing MP DD 1937-4002 2/2 (1937) 34. Port of Portland, Dry Dock Property & Western Cooperage (December 11, 1943)	• Ash Creek Associates /Newfields, 2006d. *Draft Risk Assessment Report, Willamette Cove Upland Facility.* June 16, 2006. See Site Investigation Documents at Tab 9, specifically: • Ash Creek Associates 2005. *Memorandum to Kristi Maitland (POP) and Jim Morgan (METRO), Re: Removal Action Activities: October 28, 2004, Willamette Cove, Oregon, 1056-00.* March 8, 2005. • Ash Creek Associates, 2006. *Reported Outfalls, Willamette Cove Upland Facility Memorandum.* May 17, 2006. • Ash Creek Associates /Newfields, 2006. *Riverbank Soil Sampling Results Report, Willamette Cove Upland Facility.* May 2006. • Ash Creek Associates /Newfields, 2006b. *Draft Lead Characterization Work Plan, Willamette Cove Upland Facility.* Prepared for METRO and the Port of Portland, June 2006. • Ash Creek Associates /Newfields, 2007a. *Addendum to Riverbank Soil Sampling Work Plan, Willamette Cove Upland Facility.* Prepared for Port of Portland and METRO. August 2007. • Ash Creek Associates/Newfields. 2007c. *Removal Action Plan, Willamette Cove Upland Facility.* Prepared for Port of Portland and METRO. September 2007. • BBL/Ash Creek Associates /Newfields, 2005. *Groundwater Monitoring Work Plan, Willamette Cove Upland Facility.* Prepared for Port of Portland and METRO. March 2005. • BBL/Ash Creek Associates /Newfields, 2005a. *Groundwater Monitoring Report, Third Quarter 2005, Willamette Cove Facility.* Prepared for Port of

		Portland. November 2005. • BBL/Ash Creek Associates /Newfields, 2005b. *Riverbank Soil Sampling Work Plan, Willamette Cove Upland Facility.* Prepared for METRO and Port of Portland. December 2005. • BBL/Ash Creek Associates /Newfields, 2006. *Groundwater Monitoring Report, December 2005, Willamette Cove Facility.* Prepared for METRO and the Port of Portland. April 2006. • BBL/Ash Creek Associates /Newfields, 2006b. *Riverbank Soil Sampling Report, Willamette Cove Upland Facility.* Prepared for METRO and the Port of Portland. May 2006. • Hahn and Associates, Inc. 1999. *Underground Storage Tank Decommissioning Report, Willamette Cove Property, North Richmond Street, Portland, Oregon ODEQ File #26-99-0726.* Prepared for METRO. August 13, 1999. • Hart Crowser, 2000. *Existing Data / Site Summary Report, Willamette Cove, Portland, Oregon.* (Lake Oswego, Oregon: November 8, 2000). • Hart Crowser. 2003. *Remedial Investigation, Willamette Cove, Portland, Oregon, ECSI No. 2066.* Prepared for Port of Portland and METRO. March 11, 2003.*An* • Port of Portland. 2003. *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003. See McCormick & Baxter Documents at Tab 10, specifically: • Ecology and Environment, Inc. 2002. *Sediment Cap Basis of Design, McCormick & Baxter Creosoting Company, Portland, Oregon.* Prepared for Oregon

		Department of Environmental Quality. May 2002.
m. all aerial photographs of the Property in your possession.	Aerial photographs are included at Tab 6.	See aerial photographs contained within Photos at Tab 6.
14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.	The State of Oregon owned the filled riverfront of this property until in 1990 mutual quit claim deeds resulted in PDC acquiring the filled land to the line of ordinary low water. The Port is unable to supply a map as it is not currently able to recreate the property line to which the Port owned during the relevant period from 1903 to 1950 and 1903 to 1953.	See Deeds at Tab 4.
15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.	Relevant information from the Port's records is contained within the tabs described in the references column.	
16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following: a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas; b. dated aerial photograph of the site showing each unit/area; c. the type of unit/area (e.g., storage area. landfill, waste pile. etc.), and the dimensions of the unit/area; d. the dates that the unit/area was in use; e. the purpose and past usage (e.g., storage, spill containment, etc.); f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area and; g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.	Unknown.	

17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.	Not applicable.	
18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River: a. the location and nature of each sewer line, drain, ditch, or tributary; b. the date of construction of each sewer line, drain, ditch, or tributary; c. whether each sewer line, or drain was ever connected to a main trunk line; d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and e. any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to: i. the areas serviced by the outfalls; and ii. the type of outfall (i.e., storm water or single facility operational).	There are no current stormwater or sewer systems draining the Central Parcel. City Outfall 49 (OF-49) runs through and beneath the Central Parcel but is not connected to drainage from the property. OF-49 is a conjoined concrete pipe, with an inside diameter of approximately 15 inches. Based on information from the City of Portland, OF-49 is an active City combined sewer overflow (CSO) outfall. The CSO was installed in 1945, and drains most of the residential area on the bluff above the Central Parcel. Based on a plan of the CSO outfall from the City of Portland, the CSO originally extended into the river with a creosote-treated wooden pipe that is no longer present. The City of Portland identified one outfall (designated as WR-190) on Tax Lot 124. No upland source drains have been observed in the area of this outfall. The reported outfall WR-190 appears to correspond with a 6-inch concrete pipe that is currently embedded in the riverbank and filled with soil. It is unknown whether this was ever a historical outfall or, if so, what property it drained. See City of Portland 104(e) response for documentation regarding its outfalls and related drainage areas. See also response to Question 13(i).	See Site Investigation Documents at Tab 9, specifically: • Ash Creek Associates, 2006. *Reported Outfalls, Willamette Cove Upland Facility Memorandum.* May 17, 2006.
19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention or Maintenance Plans or Spill Plans developed for different operations during the Respondent's operation of each Property.	No surface water or stormwater investigations have been performed as part of remedial action investigations at the Upland Facility. There are no active outfalls draining the property. No Stormwater Pollution Prevention or Maintenance Plans or Spill Plans exist for the Willamette Cove property during the Port's ownership (1903-1953). See also response to Questions 13(i) and 18 above.	See Site Investigation Documents at Tab 9, specifically: • Ash Creek Associates, 2006. *Reported Outfalls, Willamette Cove Upland Facility Memorandum.* May 17, 2006.
Section 4.0 - Respondent's Operational Activities		
20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.	During the Port's ownership, the Central Parcel comprised two dry docks that were in place from 1904-1953 and 1922-1953, respectively. The dry docks were available for use by public and private entities for ship repair; Oregon law forbade the Port to engage in commercial ship repair activities and specified that dry docks were to be open to common users on an equal opportunity basis. The Port's activities were generally limited to maintenance of the dry docks, and lifting and re-floating of vessels. Vessel owners and/or their contractors owned (or possibly leased from the Port) upland buildings to conduct related ship repair activities, e.g., blacksmith, pipe, woodworking, and machine shops.	See Site Investigation Documents at Tab 9, specifically: • Port of Portland. 2003. *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003. See Dry Dock Compilation Logs contained within Contractor Information at Tab 3.

21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:	Historical documents indicate the following as being stored at the Central Parcel: materials used for ship repair, conversion and outfitting, paints, anitfoulant paints, oil, solvents, metals shavings and fillings.	See Site Investigation Documents at Tab 9, specifically: • Port of Portland. 2003. *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003.
a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;	This information is unknown.	
b. the chemical composition, characteristics, physical state (e.g.. solid. liquid) of each waste or material so transported, used, purchased, generated, stored. treated, disposed, or otherwise handled;	This information is unknown.	
c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and	This information is unknown.	
d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.	This information is unknown.	
22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste, or materials and whether any such hazardous substances, waste, or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.	The Port owned and maintained the in-water dry dock lifting mechanism for vessel owners and their ship repair contractors. The over-water areas adjacent to the Central Parcel consisted of two dry docks, three wharfs, and pier access to the docks. Historical records identify ship repair activities as the prominent operation occurring over the Willamette River. Oregon law forbade the Port to engage in commercial ship repair activities and specified that dry docks were to be open to common users on an equal opportunity basis. Information detailing contractor ship repair activities is included in the Dockage Compilation Sheets. The Supplemental PA (Port, 2003), Manager's Reports, Dry Dock Logs, and Dockage Compilation sheets document the following over-water releases: • In 1914, Pontoon No. 1 sank during a docking. • In July 1924, the S.S. Sumanco was dry docked. Damage to the vessel fractured bottom plates of oil tanks, allowing oil to escape into the river. • In 1943 "fuel oil escaping from vessels at the dry docks [was] attributed to negligence or errors on the carriers" built by Kaiser. Kaiser reportedly addressed the spill.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, 2000. *Existing Data / Site Summary Report, Willamette Cove, Portland, Oregon.* (Lake Oswego, Oregon: November 8, 2000). • Port of Portland. 2003. *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003. See Dockage Compilation Sheets and Dry Dock Logs contained within Contractor Information at Tab 3. See Manager's Reports contained within Contractor Information at Tab 3.

	• In 1944, the Russian SS Ilich "capsized at the inner berth of the south pier at the dry dock and sank in about 46 feet of water" [neither the] "War Shipping Administration, its contractors or the Russians" assumed removal responsibility (Port, June 1944). The Ilich was removed by the U.S. Army Corp of Engineers in 1944. • In 1951, the Tanker Oleum caused unspecified damage requiring cleanup of oil from towers, paint trestles and decks.	
23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.	Adjacent to the Central Parcel were two dry docks, three wharfs, and pier access to the docks. The types of activities conducted, as well as the contractors that conducted the work activities, are described in the Supplemental Preliminary Assessment, the tariffs and dockage compilation logs. See also the response to Questions 5 and 11 above.	See Site Investigation Documents at Tab 9, specifically: • Port of Portland. 2003. *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003. See Dockage Compilation Logs and tariffs contained within Contractor Information at Tab 3.
24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste, or materials and whether any such hazardous substances, waste, or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.	Not applicable.	
25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 to the present). Provide the brand name of all pesticides or herbicides used.	The Port is not aware of the use of pesticides or herbicides at the Willamette Cove Central Parcel.	
26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.	Unknown.	
27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify: a. the persons with whom the Respondent made such arrangements; b. every date on which Respondent made such	Not to the Port's knowledge.	

arrangements; c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all materials involved in each such arrangement; d. in general terms, the nature and quantity of the non-hazardous materials involved in each such arrangement; e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement; f. the owner of the materials involved in each such arrangement, if not Respondent; g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions; h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated; i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the investigation Area: j. who selected the location to which the materials were to be disposed or treated; k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and l. any records of such arrangement and each shipment.		
28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).	According to a document entitled *Contractors Space Requirements – Summary of Present Use at St. Johns*, dated October 18, 1951, contractors were allotted "spaces", which were numbered and corresponded with specific buildings and some of the contractors owned the buildings used to support their operations. For example, according to the aforementioned document, Northwest Marine Iron Works owned the building in Space No. 17. Buildings on the Central Parcel during the Port's ownership (1903-1953) included the following: auto shed, pattern loft, iron rack, warehouses, store room, air compressor room, machine shop, blacksmith shop, oil storage warehouse, paint shed, carpenter shop, paint storage, tool and equipment storage, miscellaneous stores, machinist tool storage, electrical stores, and sandblast equipment storage. See also response to Question 20.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser. 2003. *Remedial Investigation, Willamette Cove, Portland, Oregon, ECSI No. 2066.* Prepared for Port of Portland and METRO. March 11, 2003. • Port of Portland. 2003. *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003. See Contractor Space Requirements contained within Contractor Information at Tab 3.

29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.	Not applicable. The Port did not conduct any activities that could be or were depicted in a schematic diagram.	
30. Provide a brief description of the nature of Respondent's operations at each location on each Property including: a. the date such operations commenced and concluded; and b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.	Over-water area adjacent to Tax Lots 39, 99 and 124 was occupied by the dry docks and shops. Dry Dock No. 1 was open from 1904 to 1953; Dry Dock No 2 was open from 1922 to 1953. Oregon law forbade the Port to engage in commercial ship repair activities and specified that dry docks were to be open to common users on an equal opportunity basis. Ship repair activities were generally conducted by contractors and licensees at the dry docks and shops. See also response to Question 11. A coal dock was constructed on Tax Lot 99 and 124 in 1919. The Port made the facility available and charged fees for storage and handling to the users. According to the Port's October 1919 Commission minutes, regulations clearly spelled out the coal owners' responsibilities, including that "Coal is stored at owners' risk; coal showing signs of heating must be removed at once by owner, and if not so moved may be moved by the Port of Portland at the Owner's expense. By 1924, the coaling dock was mainly used for machinery storage as more ships converted to oil fuel. In 1934, the former coal dock, by then referred to as a 'storage wharf,' "was partly torn out and reconstructed to provide ramps for handling dredge pipe between the storage yard and barges."	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, 2000. *Existing Data / Site Summary Report, Willamette Cove, Portland, Oregon.* (Lake Oswego, Oregon: November 8, 2000). • Port of Portland. 2003. *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003.
31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.	The Port acquired the property from May 1903 through October 1903 without an operational dry dock (No. 1). Dry Dock No. 1 was opened in 1904. Dry Dock No. 2 was constructed in 1921 by the City CPD and opened in April 1922, increasing the capacity for ship repair activities. Operations (i.e. ship repair activities) at the dry docks increased during World War I and World War II, while operations decreased during the Great Depression and following 1947 (post-WWII operations) and increased again during the Korean War (1950-1953). The Port sold Tax Lots 99 and 124 in 1950 and Tax Lot 39 in 1953. By 1953, the dry dock operations had ceased.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, 2000. *Existing Data / Site Summary Report, Willamette Cove, Portland, Oregon.* (Lake Oswego, Oregon: November 8, 2000). • Port of Portland. 2003. *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003.
32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.	Not applicable.	
33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.	Not applicable.	
34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to: a. the types of materials used to clean/maintain this equipment-machinery; b. the monthly or annual quantity of each such	The tariffs referenced in Question 35 below provide information regarding regulations imposed upon the users of the dry dock facilities related to cleaning. Information related to the ship repair contractor's activities was provided for Question 11. Additional information regarding the maintenance of dry dock equipment and machinery are provided in the Manager's Reports. Specifics regarding the exact methods and materials used for those maintenance activities were not identified other than what is contained in the Manager's Reports.	See Site Investigation Documents at Tab 9, specifically: • Port of Portland. 2003. *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary*

material used. c. the types of materials spilled in Respondent's operations; d. the materials used to clean up those spills; e. the methods used to clean up those spills; and f. where the materials used to clean up those spills were disposed of.		*Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003. See tariffs and Manager's Reports contained within Contractor Information at Tab 3.
35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.	Historic records of procedures used by the vessel owners/operators and the ship repair contractors to clean up of spills of liquid or solid materials were not identified; however, beginning as early as 1928, the Port issued tariffs providing dry dock rates and rules and regulations that included environmental provisions. Tariff 11, issued December 15, 1928, demonstrates how the Port regulated dock-side activities while placing the responsibility for flammable materials management, spills and other releases on the vessel owners and their contractors. Provisions included, but were not limited to: • All vessels using the dock or wharves must at all times keep the same clear of dirt and rubbish and thoroughly clean and sweep the dock before the vessel is refloated. • Lockers will be furnished by the dock for the storage of tools and the mixing of paints and the keeping of same while vessels are in dock or at the wharves, but no kerosene, turpentine, naptha, gasoline or other inflammable materials in quantity more than five gallons will be allowed to remain in lockers or wharves over night. The right is reserved to refuse dockage or berth at the dry dock plant to any vessel having on board explosives or highly volatile products on which might from other causes create an unusual risk. • Vessels lying at the wharves or in the dock are strictly prohibited from dumping ashes or rubbish of any kind on or about the same. • Any damage to the dock or wharves, or property connected therewith, caused by negligence or any other fault of the vessel, will be charged to the vessel. • Vessels must make provisions that fuel oil will not be discharged while on dry dock or afloat at wharves. The Port of Portland reserves the right to remove oil discharged in violation of this rule by any means it chooses and the cost of such removal or attempts to remove such oil will constitute a charge against the vessel in addition to the dock dues. Vessels and contractors will be held responsible for acts of their employees.	See contractor records and tariffs contained within Contractor Information at Tab 3.
36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information: a. its physical state; b. its nature and chemical composition; c. its color; d. its odor. e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.	Unknown.	

37. Provide a schematic diagram that indicates which pan of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.	Unknown.	
38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.	Unknown with respect to activities that ceased by 1953.	
39. For each type of waste describe Respondent's contracts, agreements or other arrangements for its disposal, treatment, or recycling.	Not applicable.	
40. Provide copies of such contracts and other documents reflecting such agreements or arrangements: a. state where Respondent sent each type of its waste for disposal, treatment, or recycling; b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request); c. if Respondent transported any of its wastes away from its operations, please so indicate; d. for each type of waste specify which Waste Carrier picked it up; e. indicate the ultimate disposal/recycling/treatment location for each type of waste. f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and g. state the basis for and provide any documents supporting the answer to the previous question.	Not applicable.	
41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to: a. the nature and Chemical composition of each type of waste; b. the dates on which those wastes were disposed; c. the approximate quantity of those wastes	Unknown.	

disposed by month and year; d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre-treatment plant, Publicly Owned Treatment Works (POTW), etc.); and e. whether and what pretreatment was provided.		
42. Identify any sewage authority or treatment works to which Respondent's waste was sent.	The Port is not aware of any waste materials sent to the sewage authority or treatment works (i.e. City of Portland POTW).	
43. Describe all settling tank. septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.	No records have been located that identify any installation or use of a wastewater treatment system at the facility.	
44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.	See response to Questions 5, 11 and 20.	See Site Investigation Documents at Tab 9, specifically: • Port of Portland. 2003. *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003. See Dockage Compilation Sheets contained within Contractor Information at Tab 3.
45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.	See response to Question 21.	See Site Investigation Documents at Tab 9, specifically: • Port of Portland. 2003. *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003.
46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.	Records related to the responses to Questions 5, 11 and 21 are included at Tab 9.	
47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.	No historical documents identified provide information of the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of PCBs.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, *Remedial Investigation Report, Willamette Cove, Portland, Oregon, ECSI No. 2066.* March 11, 2003.

48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.	Not applicable.	
49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the Property.	Not applicable.	
Section 5.0 - Regulatory Information		
50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and environmental concerns.	Relevant federal, state and local authorities during the Port's ownership of the Central Parcel (1903-1953) are summarized below. <u>Federal</u> Emergency Fleet Corporation (WWI), U.S. Shipping Board (WWI), National Recovery Administration (1930s), Civil Works Administration (1930s), War Shipping Commission, and US Maritime Commission (WWII), Works Progress Administration (1930s), and U.S. Bureau of Ships (WWII) <u>State</u> Oregon State Emergency Relief Administration (1930s) <u>Local</u> City of Portland Harbor Master The Port did not identify any contacts with these agencies or departments that would have dealt with health and safety issues or environmental concerns.	
51. Describe all occurrences associated with violations, citations, deficiencies. and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.	The Port did not identify any violations, citations, deficiencies or accidents related to health and safety or environmental concerns during its period of ownership of the Central Parcel.	
52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits. NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.	The Port did not identify any environmental permits issued during its period of ownership of the Central Parcel. The Port's ownership pre-dated environmental permit requirements.	
53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.	No.	

54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility dots not currently have interim status; describe the circumstances under which the facility lost interim status.	No.	
55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.	Not applicable.	
56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.	The Port has not filed hazardous substance or hazardous waste information with a federal office for the Willamette Cove property.	
57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.	The Port has never filed hazardous substance or hazardous waste information with a state office for the Willamette Cove property.	
58. List all federal and state environmental laws and regulations under which Respondent has reported federa1 or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.	Not applicable.	
59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.	The Port's ownership of the Central Parcel pre-dated the Toxic Substances Control Act and other laws regulating PCBs.	

60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other stale agency.	Not to the Port's knowledge.	
61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or slate law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.	Not applicable.	
Section 6.0 - Releases and Remediation		
62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify: a. when such releases occurred; b. how the releases occurred (e.g. when the substances were being delivered by a vendor, transported or transferred (to or from any tanks. drums, barrels, or recovery units). and treated); c. the amount of each hazardous substances, pollutants, or contaminants so released; d. where such releases occurred; e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release; f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken; g. all persons with information relating to these releases; and h. list all local, state, or federal departments or agencies notified of the release, if applicable;	See response to Question 22 above. With regard to bullet (i), the Port did not own the Central Parcel in 1989 and is not aware of a sulfuric acid spill in the vicinity of Willamette Cove. With regard to bullet (j), the Port is not aware of any spills, releases or waste disposal practices attributable to Cargill at the Central Parcel or in the vicinity of Willamette Cove.	

i. include a description of a sulfuric acid spill in May 1989 recorded by the Oregon State Fire Marshall's Office; and j. Specifically provide all information you have regarding spills, releases or waste disposal practices of Cargill, Inc. on any of your Properties.		
63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify: a. where the disposal system or floor drains were located; b. when the disposal system or floor drains were installed; c. whether the disposal system or floor drains were connected to pipes; d. where such pipes were located and emptied; e. when such pipes were installed; f. how and when such pipes were replaced. or repaired; and g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.	No information was found detailing this type of information.	
64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:	See responses to bullets (a) through (j) below.	
a. amount of soil excavated; b. location of excavation presented on a map or aerial photograph; c. manner and place of disposal and/or storage of excavated soil; d. dates of soil excavation; e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent; f. reason for soil excavation; g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents; h. all analyses or tests and results of analyses of the soil that was removed from the Property;	West Parcel UST Removal: a. ~137 tons of petroleum-contaminated soils (PCS). b. See Figure 5 of the *Remedial Investigation.* c. The PCS were removed and transported off the property for treatment. Refer to *Underground Storage Tank Decommissioning Report, Willamette Cove Property, North Richmond Street, Portland, Oregon* (Hahn and Associates, 1999) for further information. d. July 1999. Refer to *Underground Storage Tank Decommissioning Report, Willamette Cove Property, North Richmond Street, Portland, Oregon* (Hahn and Associates, 1999) for further information. e. Refer to *Underground Storage Tank Decommissioning Report, Willamette Cove Property, North Richmond Street, Portland, Oregon* (Hahn and Associates, 1999) for further information. f. Removal of UST. g. Detected contaminants include: diesel, leachable barium, and a few petroleum VOCs. h. Refer to *Underground Storage Tank Decommissioning Report, Willamette Cove Property, North Richmond Street, Portland, Oregon* (Hahn and Associates, 1999) for further information.	See Site Investigation Documents at Tab 9, specifically: • Ash Creek Associates 2005. *Memorandum to Kristi Maitland (POP) and Jim Morgan (METRO), Re: Removal Action Activities: October 28, 2004, Willamette Cove, Oregon, 1056-00.* March 8, 2005. • Hahn and Associates, Inc. 1999. *Underground Storage Tank Decommissioning Report, Willamette Cove Property, North Richmond Street, Portland, Oregon ODEQ File #26-99-0726.* Prepared for METRO. August 13, 1999. • Hart Crowser, *Remedial Investigation Report,*

i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and j. all persons, including contractors, with information about (a) through (i) of this request.	i. Refer to *Underground Storage Tank Decommissioning Report, Willamette Cove Property, North Richmond Street, Portland, Oregon* (Hahn and Associates, 1999) for further information. j. Hahn and Associates, DEQ, and METRO. <u>Removal Action Activities:</u> a. ~75 cubic yards. Refer to *Willamette Cove Removal Action Activities - October 28, 2004 Letter* (Ash Creek, 2005) for further information. b. See Figure 3 from *Willamette Cove Removal Action Activities - October 28, 2004 Letter* (Ash Creek, 2005). c. PCS was disposed of at the Hillsboro Landfill. See Attachment D of *Willamette Cove Removal Action Activities - October 28, 2004 Letter* (Ash Creek, 2005). d. October 28, 2004 e. Excavation activities were performed by Mr. Troy Feather of Remtech. f. Removal of mobile separate phase petroleum product, observed during the remedial action at the McCormick & Baxter Creosoting Company Superfund Facility, to the extent practicable by soil excavation. g. Diesel and heavy oil range hydrocarbons were detected in samples from the test pits. h. TPH by Method NWTPHDx i. Refer to *Willamette Cove Removal Action Activities - October 28, 2004 Letter* (Ash Creek, 2005) for further information. j. Ash Creek Associates, Port of Portland, METRO, and DEQ.	*Willamette Cove, Portland, Oregon, ECSI No. 2066.* March 11, 2003.
65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.	Yes, the groundwater under the Facility has been investigated during environmental investigations. The initial groundwater investigations were conducted as a part of the RI. References and results are contained in the RI Report; a copy of this report is attached. Additional groundwater monitoring of onsite wells was completed following the RI. Results of this work are contained in two reports: *Groundwater Monitoring Report, Third Quarter 2005* dated November 2005 and *Groundwater Monitoring Report, December 2005,* dated April 2006. Both reports are also attached. Also see response to Question 71.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, *Remedial Investigation Report, Willamette Cove, Portland, Oregon, ECSI No. 2066.* March 11, 2003. • BBL/Ash Creek Associates /Newfields, 2005. *Groundwater Monitoring Report, Third Quarter 2005, Willamette Cove Facility.* Prepared for Port of Portland. November 2005. • BBL/Ash Creek Associates /Newfields, 2006. *Groundwater Monitoring Report, December 2005, Willamette Cove Facility.* Prepared for METRO and the Port of Portland. April 2006.
66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents	No.	

regarding: a. reason for groundwater action; b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents; c. all analyses or tests and results of analyses of the groundwater; d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and e. all persons, including contractors, with information about (a) through (c) of this request.		
67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unqualified "no", identify and provide copies of any documents regarding: a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged; b. the dates of each such occurrence; c. the amount and location of such release; d. were sheens on the river created by the release; e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.	See response to Question 22 above.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, 2000. *Existing Data / Site Summary Report, Willamette Cove, Portland, Oregon.* (Lake Oswego, Oregon: November 8, 2000). • Port of Portland. 2003. *Final Draft – Remedial Investigation Addendum: Supplemental Preliminary Assessment of the Willamette Cove Upland Facility, Portland, Oregon.* September 19, 2003.
68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s) or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.	Releases or threatened releases of PCBs were not identified.	See Site Investigation Documents at Tab 9, specifically: • Hart Crowser, *Remedial Investigation Report, Willamette Cove, Portland, Oregon, ECSI No. 2066.* March 11, 2003.
69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release	Releases or threatened releases of PCBs were not identified.	

or threatened release.		
Section 7.0 - Property Investigations		
70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.	The Port is communicating with its insurers regarding defense and settlement of third party claims associated with the Portland Harbor Superfund Site. The communications between the Port and its insurers are confidential settlement negotiations in an ongoing insurance settlement process among the Port and its insurers and their respective legal counsel. The Port and its insurers have common interests adverse to third party governmental agencies and other potentially responsible parties involved in the Harbor (including associated upland sites) where actual or a reasonable likelihood of future litigation exists. Such communications are subject to attorney-client and work product privileged confidential communications under the common interests doctrine. With respect to Willamette Cove, the factual information underpinning these confidential communications has, nonetheless, been disclosed in documents and responses provided to these questions.	
71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property, Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.	***Upland Facility Investigations*** **Grayco Investigation.** From December 1988 through January 1989, Sweet Edwards/EMCON, Inc. performed an environmental investigation of the entire Upland Facility for Grayco Resources, Inc. (EMCON, 1989). This investigation was performed prior to sale of the property to PDC. Geophysical traverses were performed over a portion of the upland area to assess for buried objects such as USTs. Buried drainage pipes and sumps were found, but no USTs were located. Explorations included 19 soil borings (SE/E-1 through SE/E-13) and four hand-augered soil borings (HA-1 through HA-4). Oil-like organic sheen was observed on groundwater samples from a few borings in the west or western Central Parcels (locations SE/E-9, SE/E-10, SE/E-12, SE/E-13, and SE/E-19). A sheen on river water was observed at the south end of the cove, in the area of the McCormick and Baxter Superfund site NAPL seep. Samples were analyzed for a variety of contaminants. Detections included from 520 to 680 mg/kg oil and grease in soil samples from SE/E-2, SE/E-8, HA-3, and HA-4; 297 mg/L TPH in groundwater from SE/E-19; and 2.5 and 1.6 µg/L PCBs in groundwater from SE/E-12 and SE/E-13, respectively (PCBs, however, were not detected in follow-up groundwater samples from nearby borings SE/E-14 and SE/E-19). Total metal results detected several metals, presumably due to suspended solids. Dissolved results only detected chromium, lead, and nickel at less than 11 µg/L in one to several samples and 14 to 110 µg/L zinc in all samples. Based on this investigation, the boring locations with oil sheens on groundwater (i.e., SE/E-9, SE/E-10, SE/E-12, SE/E-13, and SE/E-19) were identified as areas of potential concern. Because PCBs were detected in groundwater from SE/E-12 and SE/E-13, groundwater from monitoring wells installed in the West Parcel as part of this RI included analysis for PCBs. Based on EMCON's interpretation of the analytical data, the report concluded "Based	See Site Investigation Documents at Tab 9, specifically: • Ash Creek Associates 2005. *Memorandum to Kristi Maitland (POP) and Jim Morgan (METRO), Re: Removal Action Activities: October 28, 2004, Willamette Cove, Oregon, 1056-00.* March 8, 2005. • Ash Creek Associates /Newfields, 2006. *Riverbank Soil Sampling Results Report, Willamette Cove Upland Facility.* May 2006. • BBL/Ash Creek Associates /Newfields, 2005. *Groundwater Monitoring Work Plan, Willamette Cove Upland Facility.* Prepared for Port of Portland and METRO. March 2005. • BBL/Ash Creek Associates /Newfields, 2005. *Groundwater Monitoring Report, Third Quarter 2005, Willamette Cove Facility.* Prepared for Port of Portland. November 2005. • BBL/Ash Creek Associates /Newfields, 2005a. *Riverbank Soil Sampling Work Plan, Willamette*

on the field investigation and laboratory analysis completed for this study, the site has not been significantly impacted by past site activities or from contamination resulting from offsite sources" (EMCON, 1989).

Trust For Public Land Investigation. From October through December 1995, EMCON performed a supplemental investigation of the Willamette Cove Upland Facility for the Trust for Public Land (EMCON, 1996). This investigation was performed prior to purchase of the property by METRO. Subsurface explorations included 15 test pits (TP-1 through TP-15) and four soil borings (TB-1 through TB-4). Discrete soil samples, composite soil samples, and groundwater samples were analyzed for a wide variety of contaminants.

Significant detections in soil included up to 563 mg/kg oil-range hydrocarbons in several composite soil samples; 1,420 and 2,870 mg/kg lead in test pits TP-7 and TP-9; and 0.005 to 0.014 mg/kg pentachlorophenol (PCP) in samples from the East Parcel. Polynuclear aromatic hydrocarbons (PAHs) were detected in all six soil samples submitted, with individual compounds ranging up to 3.9 mg/kg. Groundwater analyses detected 0.429 to 0.860 mg/L TPH in samples from the borings; 25 µg/L trichloroethene (TCE) and 1.0 µg/L tetrachloroethene (PCE) in TB-1 located on the upgradient boundary of the West Parcel; and from 10 to 21 µg/L bis(2-ethylhexyl) phthalate in TB-1, TB-3, and TB-4. Several PAHs were detected in groundwater, with individual compounds ranging up to 1.5 µg/L for non-carcinogenic PAHs and 0.3 µg/L for carcinogenic PAHs.

Based on these data, EMCON identified the following locations warranting further investigation: surface soil at test pits TP-7 and TP-9 (elevated lead); surface soil from the East Parcel (PAHs and PCP); and groundwater at boring TB-1 (chlorinated VOCs). Based on EMCON's interpretation of the analytical data, the report concluded that "under both current and planned future development of the site as a riverfront park, unacceptable health risks to either humans or ecological communities are not expected from the chemicals detected at the site" (EMCON, 1996).

West Parcel UST Removal. In July 1999, METRO had a 12,000-gallon UST was removed from the West Parcel (Hahn, 1999). The former UST was located in the southeastern portion of the West Parcel (this location corresponds to a former steam vat that was used in peeling of logs for plywood production). During brush clearing activities, several gallons of black tarry oil were observed on the ground surface. When the oil and associated petroleum-contaminated soil (PCS) were removed, a UST was discovered at a depth of 7 feet. The UST was filled with water and residual product (PS 300 fuel oil). The UST was pumped out, inerted, and removed. No corrosion pits or holes were observed in the UST. About 137 tons of PCS were removed and transported off the property for treatment. The maximum depth of excavation was about 18 feet. Groundwater was not encountered in the excavation. Based on these results, the excavation was backfilled by grading soil from the surrounding area into the excavation.

Chemical analyses on contaminated soil detected 13,300 mg/kg diesel, 7,160 mg/kg oil, 3.4 mg/L leachable barium; and a few petroleum hydrocarbon constituents (each less than 0.027 mg/kg). Chlorinated VOCs, benzene, and PCBs were not detected. Six soil samples were collected from the bottom and sidewalls of the final excavation and were analyzed for diesel and oil. The only detection was 164 mg/kg oil in a sample collected at 18 feet below ground surface (bgs) from below the fill-end of the UST. Based on these results, the excavation was backfilled by grading soil from the surrounding area into the excavation.

McCormick & Baxter Superfund Facility. Since 1983, numerous environmental activities have been performed by the Oregon DEQ at and near the McCormick & Baxter Superfund Facility, a former wood treating facility whose

Cove Upland Facility. Prepared for METRO and Port of Portland. December 2005.

- BBL/Ash Creek Associates /Newfields, 2006. *Groundwater Monitoring Report, December 2005, Willamette Cove Facility.* Prepared for METRO and the Port of Portland. April 2006.
- BBL/Ash Creek Associates /Newfields, 2006b. *Riverbank Soil Sampling Report, Willamette Cove Upland Facility.* Prepared for METRO and the Port of Portland. May 2006.
- EMCON, 1989. *Level II Environmental Site Assessment, St. Johns Riverfront Property, Portland, Oregon.* March 15, 1989.
- EMCON, 1996. *Supplemental Environmental Site Assessment, St. Johns Riverfront Property, Portland, Oregon.* Includes a Qualitative Risk Assessment (Appendix E). January 9, 1996.
- Hahn and Associates, Inc. 1999. *Underground Storage Tank Decommissioning Report, Willamette Cove Property, North Richmond Street, Portland, Oregon ODEQ File #26-99-0726.* Prepared for METRO. August 13, 1999.
- Hart Crowser. 2003. *Remedial Investigation, Willamette Cove, Portland, Oregon, ECSI No. 2066.* Prepared for Port of Portland and METRO. March 11, 2003.

See Site McCormick & Baxter Documents at Tab 10, specifically:

- Ecology and Environment, Inc. 2002. *Sediment Cap Basis of Design, McCormick & Baxter Creosoting Company, Portland, Oregon.* Prepared for Oregon Department of Environmental Quality. May 2002.
- Ecology and Environmental, Inc. 2003. *Surface Water, Sediment, and Groundwater Sampling Report*

	contamination extends into Willamette Cove. The McCormick & Baxter site is immediately upstream (southeast) of Willamette Cove. Several sources of chemical contamination have been identified, including the Former Waste Disposal Area (FWDA) in the northwest corner of this facility. NAPL disposed of in the FWDA have migrated on and through groundwater, emerging as NAPL seeps along the Willamette River and on METRO's property and in Willamette Cove. The NAPL seep in the cove is an area of concern that warranted further delineation. As part of the investigation activities at the McCormick & Baxter Superfund Facility, some sampling was performed on the Willamette Cove Upland Facility. To assess windblown transport of contaminants from the McCormick & Baxter Superfund Facility, two samples (SR-3 and SR-4) were obtained from the East Parcel in 1991 (PTI, 1992). Results on these samples did not indicate the presence of windblown contamination. In September 1998, a monitoring well (MW-35s) was installed by the DEQ on the north side of the railroad embankment to delineate the NAPL plume between the McCormick & Baxter Superfund Facility and Willamette Cove. In October 1999, a groundwater sample was collected by subcontractors to DEQ from the well and analyzed for TPH, VOCs, SVOCs, and pesticides (E&E, 2000c). No chemical compounds were detected. In 2004, a sediment cap was installed by subcontractors to DEQ in-water and upland at the south end of the cove to control the NAPL seep originating from McCormick and Baxter. **Remedial Investigation.** From April 2001 through May 2002, Hart Crowser performed remedial investigation (RI) activities at the Willamette Cove Upland Facility (ECSI No. 2066) in the St. Johns section of Portland, Oregon. The purpose of the activities was to characterize the magnitude and extent of chemical contamination in soil and groundwater at the facility. RI activities were performed using a phased approach. Potential areas of concern that had been identified based on previous investigations performed on the Upland Facility and historical uses of the Upland Facility were assessed during the initial phase. Based on these data, a second phase of activities was performed to delineate contaminants in surface soils and assess groundwater quality. In total, the RI activities included completing 26 test pits, 30 push probes, and seven hand-augered soil borings; collecting 35 surface soil samples; installing seven groundwater monitoring wells; and performing two groundwater monitoring events. Selected soil and groundwater samples were analyzed for a variety of chemical contaminants to assess an area of potential concern, to delineate contaminant concentrations, and/or assess groundwater quality. A total of 262 soil analyses (including one analysis on slag) and 152 groundwater analyses were performed. Analyses included total petroleum hydrocarbons (TPH), polynuclear aromatic hydrocarbons (PAHs), semivolatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), organochlorine pesticides, metals, volatile organic compounds (VOCs), phenols, and formaldehyde. Soil data indicated TPH was present in samples scattered across the facility. PAHs were detected in most samples, with relatively higher concentrations of carcinogenic PAHs in the boundary area of the West and Central Parcels and the eastern half of the Central Parcel. Elevated metals concentrations were present in several samples, generally in the Central Parcel. SVOCs (non-PAH), PCBs, pesticides, VOCs, phenols, and formaldehyde, if detected, were only detected in a fairly limited number of soil samples. Groundwater data detected relatively low concentrations of VOCs, PAHs, and dissolved metals. PCBs were not detected and due to the proximity of borings to historical sampling, did not support the detection of PCBs in the two historical borings installed during the 1988/1989 and some non-PAH SVOCs were detected in groundwater in probe B-30 (presumably from the McCormick & Baxter	*September 2002, McCormick & Baxter Creosoting Company Site, Portland, Oregon DEQ Task Order No. 88-97-39.* Prepared for Oregon Department of Environmental Quality. February 2003.

Creosoting Company Superfund Facility).

The data were also assessed to identify potential hot spots of contamination. Due to relatively high concentrations of benzo(a)pyrene (a carcinogenic PAH), a potential hot spot was identified in surface soil at the west end of the Central Parcel (i.e., in the area of TP-22 and SS-9).

Removal Action Activities – October 28, 2004. As a part of the sediment cap installed for the McCormick and Baxter NAPL seep, wooden piers were removed from the in-water area of the cove during the summer of 2004. During the pier removal process, the vibrations from removing the piers caused a sheen to appear on the water in the cove. The sheen was emanating from soil near the pier structures. A soil investigation was conducted to identify the source of the sheen. A removal action was then conducted to further investigate the nature and extent of petroleum product on METRO's property along the innermost beach of Willamette Cove and remove mobile petroleum product from METRO's property (i.e., inland of the OLLW) to the extent practicable through soil excavation. The removal action delineated the extent and successfully removed the mobile petroleum product from METRO's property. The excavation was terminated at the edge of the water, so residual product may be present beneath the Oregon Division of State Lands (DSL) property located riverward of the OLLW. The origination of the product could not be determined during the excavation. After inquiry, neither METRO nor the Port has any information to suggest the product originated on METRO's property during its ownership. The test pits and removal action demonstrated that there is not a continuing source to the river from the upland area.

River Bank Soil Sampling Report. In response to comments received from DEQ in meetings on June 22, 2005 and October 17, 2005, the Port and METRO developed a work plan to investigate potentially erodable soil on the riverbank at the Facility (BBL/Ash Creek/Newfields, 2005). The purpose of this work was to assess for the presence and magnitude of petroleum aromatic hydrocarbons (PAHs), metals, and/or polychlorinated biphenyls (PCBs) in the potentially erodable riverbank soil. With the exception of PAHs in the beach area of the Central Parcel and PCBs in the area of sample WC-SSH, detected constituents were below sediment probably effect concentrations (PECs). PAH concentrations in samples from the Central Parcel (WC-SSC, WC-SSD, and WC-SSE) were only slightly above the PECs, and the sub-samples from WC-SSE did not contain PAHs above the PECs. Three of four sub-samples from composite sample WC-SSH contained PCBs at concentrations above the PEC. The Port and METRO are currently conducting additional investigations of the extent of the PCBs. The investigation is anticipated to be completed by June 2008.

Groundwater Monitoring. The DEQ provided comments on the Remedial Investigation Report in a letter dated December 20, 2003. As a part of these comments, the DEQ requested additional groundwater monitoring of existing Port/METRO wells at the Facility to provide further data to verify previously detected constituent concentrations and to evaluate groundwater concentrations under low water conditions. The two groundwater events took place during August and December 2005.

Overall, metals concentrations are consistent with historical values (Table 4), and were generally less than those observed during the August 2005 sampling event. For many of the metals, the dissolved metals concentrations were significantly less than the total metals concentrations, reflecting the turbidity of the sample. Concentrations of PAHs detected in wells MW-01 through MW-04 were consistent with previous results, though the detected concentrations were generally less than those observed during the August 2005 sampling event. VOC results were consistent with

	previous sampling events. All VOCs were below method reporting limits in the samples collected from wells MW-01 and MW-03. Chlorobenzene, naphthalene, toluene, and 1,2,4-trimethylbenzene were detected in the sample collected from well MW-2. These concentrations are consistent with previously observed concentrations in this well. Diesel range organics (DRO) were below sample quantitation limits in both of the samples analyzed (MW-06 and MW-07). Heavy oil range hydrocarbons were not detected in the groundwater samples. ***Sediment Investigation*** **Trust For Public Land Investigation.** As part of the 1995 supplemental investigation for the Trust for Public Land (prior to purchase of the Upland Facility by METRO), EMCON collected 17 surface sediment samples from the Willamette River and Willamette Cove adjacent to the upland areas. These samples were composited into three samples, each consisting of individual sediment samples from five to six locations. Samples were analyzed for a variety of contaminants. Detections included oil-range hydrocarbons ranging from 189 to 762 mg/kg; PAHs with individual concentrations ranging up to 2.9 mg/kg; and butylins including 0.187 mg/kg tributyltin (TBT). No elevated metals concentrations were indicated by the data. **McCormick & Baxter Superfund Facility.** Chemical contamination of sediments has occurred along this facility and into Willamette Cove due to historical releases at the facility's former creosote dock and from NAPL seeps along the Willamette River and in Willamette Cove. To assess the nature, extent, and magnitude of sediment contamination, several studies have been performed in the river and cove. In 1990 and 1992, PTI Environmental Services (PTI) on behalf of the DEQ sampled surface and subsurface sediments and performed chemical, physical, and biological testing. From 1999 through 2002, E&E on behalf of the DEQ performed additional sampling activities to further delineate contamination for a proposed sediment cap. The results of these studies have indicated high concentrations of PAHs (up to 5,200 mg/kg) are present near the creosote dock, downstream into Willamette Cove, and along the sediment drop-off along the harbor line; PAH concentrations appear to decline rapidly away from known or suspected NAPL release areas, suggesting little lateral spreading of PAH-contaminated sediment; and sediment testing for PAHs is generally a reliable indicator to define the area to be capped due to chemical contamination.	
72. Describe any remediations or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk: evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.	See responses to Questions 70 and 71 for the remediation and response actions conducted at the site.	

73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, and hydrology or air quality on or about the Property? If so, identify:	A riverbank soil investigation is currently being completed; ACA is conducting this work. The purposed is to assess the lateral and vertical extent of PCBs in shallow riverbank soil in the East Parcel of the Willamette Cove property. The investigation is anticipated to be completed by June 2008.	
a. what the nature and scope: of these investigations will be;	See response to Question 73 above.	
b. the contractors or other persons that will undertake these investigations;	See response to Question 73 above.	
c. the purpose of the investigations;	See response to Question 73 above.	
d. the dates when such investigations will take place and be completed; and	See response to Question 73 above.	
e. where on the Property such investigations will take place.	See response to Question 73 above.	
Section 8.0 - Corporate Information		
74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:	See response to bullets (a) through (e) below.	
a. state the current legal ownership structure (e.g.. corporation, sole proprietorship);	The Port of Portland was created by the Oregon legislature in 1891. Oregon Revised Statute 778 contains the authority of the Port of Portland. It is a state Port District for an area encompassing all of Multnomah, Clackamas and Washington Counties. The Port is governed by a nine person commission appointed by the Governor of Oregon and confirmed by the State Senate.	
b. state the names and current addresses of all current and past owners of the business entity or, if a corporation, current and past officers and directors;	Port of Portland 121 NW Everett Portland, OR 97209	
c. discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;	Not applicable.	
d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and	Not applicable.	

e. if your- business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.	Not applicable.	
75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:	Port of Portland Registered Trademark Name - Rivergate Industrial District	
a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g.., dissolution, bankruptcy, sale) if it is no longer in business;	Yes, the Port of Portland is extant.	
b. names, addresses, and telephone numbers of all registered agents, officers and operations management personnel; and	Registered Agent: Carla L. Kelley General Counsel Port of Portland 121 NW Everett Street Portland, OR 97209 503-944-7031 President, Port Commission Judith A. Johansen (b) (6) Lake Oswego OR 97034 Home: (b) (6) Vice President, Port Commission Mary F. Olson Norris, Olson & Associates, Inc. 7105 SE 19th Ave. Portland OR 97202 503-235-2425 Treasurer, Port Commission William D. Thorndike, Jr. Medford Fabrication PO Box 1588 1109 Court Street Medford OR 97501 541-770-1172 Secretary, Port Commission Steven H. Corey	

	Corey, Byler, Rew, Lorenzen & Hojem PO Box 218 Pendleton OR 97801	
c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.	Not applicable.	
76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.	Oregon Revised Statutes 777 and 778.	
77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:	Not applicable.	
a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;	Not applicable.	
b. the dates such relationship existed;	Not applicable.	
c. the percentage of ownership of Respondent that is held by such other entity(ies);	Not applicable.	
d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;	Not applicable.	
e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and	Not applicable.	
f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.	Not applicable.	

78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.	Not applicable.	
Section 9.0 - Compliance With This Request		
79. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:	Records reviewed for this request include the following Port departments: Environmental Affairs Legal Research Engineering	
a. the name and current job title of all individuals consulted;	Nicole LaFranchise (Environmental Project Manager), Sara Moore (Environmental Liability Analyst), Suzanne Barthelmess (Claims Manager)	
b. the location where all sources reviewed are currently reside; and	Port of Portland offices and records storage	
c. the date consulted.	May – June 2008.	
80. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous materials at, or transportation of hazardous substances, waste, or materials to or from each Property identified in response to Question 4.	Not applicable.	
81. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following;	Given that the Central Parcel facilities were closed in 1953 it is likely that "solicited" documents are no longer available, but it is also not possible to verify this. Records Review and destruction notices were reviewed to determine if any relevant records were destroyed pertaining to the Willamette Cove property. Consistent with public-recordkeeping requirements, the Records Review and Destruction Notices are maintained at the Port of Portland Administrative office. The Destruction Notices contain standard information including the former archive box number, originating department, and date of destruction. Limited information is provided on the contents of the files formerly contained within the boxes; records are described generally, using categories such as "miscellaneous correspondence," "chronological files," "memos," etc. While some provide a reference to a property to which the records may have pertained, it is so general that there is no way to determine with any certainty the nature or content of the documents that were destroyed.	

a. the document retention policy between 1937 and the present;	The Port is required by law to retain all "public records" for at least the period of time specified in a retention schedule approved by the State Archivist. The Port of Portland Records Retention and Disposition Schedule is the approved retention schedule for the Port of Portland. "Public records" include documents, books, papers, photographs, files, sound recordings, or machine-readable electronic records, regardless of physical form or characteristics, which are made, received, filed, or recorded by the Port in connection with the transaction of Port business. Employees must adhere to records retention and destruction procedures established by the Port's records manager in accordance with State statutes and the Port of Portland Records Retention and Disposition Schedule. The Port's retention and disposition schedules were suspended for records relevant to Portland Harbor when the Port received notice of its listing on the National Priority List in December 2000.	
b. the approximate date of destruction;	At this time, no documents have been identified as destroyed; however it should be noted that a fire occurred at the Port's former library on Swan Island (year unknown), and reportedly destroyed most of the records it contained. It is possible records relevant to Willamette Cove were destroyed at that time.	
c. a description of the type of information that would have been contained in the documents;	Not applicable.	
d. the name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for destroying the documents; and the person(s) who had and/or still have the originals or copies of these documents; and	Michael Wells Records Manager Port of Portland 121 NW Everett Street Portland, OR 97209	
e. the names and most current addresses of any person(s) who may possess documents relevant to this inquiry.	None known.	
82. Provide a description of all records available to you that relate to all of the questions in this request, but which have not been included in your responses.	The Port believes that it is reasonably likely that it will be in litigation with others over the responsibility for contamination in Willamette Cove. Work product in anticipation of litigation and written communications in order for the Port to obtain legal advice relating to the environmental liability issues associated with Willamette Cove, including such attorney-client and work product communications with METRO under a common interests settlement and cooperation agreement, are not disclosed as part of this submission; however, no underlying facts referenced in such confidential communications that are responsive to these questions have been withheld on these confidentiality grounds. See also response to Question 70. This response is based on the documents we have been able to identify and review to date. If additional information comes available or is encountered, it will be submitted under separate cover.	