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Wednesday, January 04, 2023

Oregon Department of Environmental Quality
Attn: Mr. Jim Orr, Project Manager
Voluntary Cleanup and Portland Harbor Section
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Subject: Fourth Quarter 2022 Progress Report for Johnson-Lampros Warehouse Facility
in Portland, Oregon, ECSI #2441

Dear Mr. Orr:

On behalf of Johnson-Lampros Warehouse LLC (JLW), the ownership group of the Johnson-Lampros Warehouse Facility (subject site), EVREN Northwest, Inc. (ENW) submits to the Oregon Department of Environmental Quality (ODEQ) this 4th Quarter 2022 Progress Report. The subject site is located at 9040 N. Burgard Way in Portland, Oregon. This report is submitted in response to ODEQ's request for Storm Water Source Control progress reports in its June 27, 2017 letter entitled ODEQ Comments for May 18, 2017 Stormwater Source Control Work Plan, ECSI #2441. This Progress Report documents and discusses project activities from October 1st through December 31st, 2022. In addition, activities planned for the 1st Quarter 2023 are discussed.

Actions Completed: Fourth Quarter 2022

Since taking over ownership of the subject site, JLW have completed the following additional activities:

- A new storm water system was installed. All onsite storm water now discharges through a storm-water treatment vault.
 - JLW determined that the storm water line that conveys discharge from Felton's property onto the subject site can be left in place. Currently, this storm water line transects the subject site. The storm-water treatment vault installed on the subject site outfalls to this line just before the west property boundary with Schnitzer Steel. Therefore, the subject site does not contribute any storm water to this line except treated storm water at the west property margin.
- Continued to work on addressing contributions to storm water flow at the subject site from offsite properties.
 - Schnitzer Steel is currently installing new storm water management facilities in N Burgard Way. These measures will include additional catch basins and grading to minimize flow-on to our facility from Burgard Way.
 - ENW has been investigating storm-water flow onto the facility from N Time Oil Road. ENW documented significant sediment-loaded storm-water flow onto the subject site from an area hydraulically upgradient on N Time Oil Road. The likely major source of this sediment load to this storm water flow appears to be a facility located at or near the 12299 N Burgard Way property. ENW has discussed this issue with the City of Portland and ODEQ, so that they can further investigate.

- JLW has stated sample collection related to performance monitoring associated with the implementation of the source control measures. Currently, a single sample has been collected for this purpose.
- Since JLW took over the ownership of this facility and the associated 1200-Z NPDES storm-water permit:
 - Based on data collected in 2022 since installation of the updated storm water system, there were no permit benchmark exceedances based on the geometric mean of all sampling events. This data supports that existing Best Management Practices in combination with pre-treatment are working to reduce the concentrations of all monitored constituents below their respective benchmarks.
 - On September 29, 2022, the City of Portland approved a partial monitoring waiver for their 1200-Z NPDES permit for all constituents with the exception of total iron, which was not eligible for a waiver at that time since is it an impairment pollutant.

Actions Planned: First Quarter 2023

JLW is planning the following Source Control and/or storm-water permit related activities during the first quarter of 2023:

- Continue storm-water inspections as required by the 1200Z storm-water industrial discharge permit.
- Based on total iron data collected to date, we anticipate requesting a monitoring waiver for total iron in the first quarter of 2023, which would constitute a full monitoring waiver for this facility.
- Continue performance monitoring associated with the implementation of the source control measures. It is anticipated that the remaining three storm water samples will be collected during the first two quarters of 2023. Once all four samples have been collected, the data will be evaluated and documented, as outlined in the ODEQ-approved work plan.
- JLW recently received comments from ODEQ and the EPA regarding SCE as it relates to ground water. We are reviewing those comments and will respond to ODEQ and update the SCE ground water work plan, as appropriate.

Should you have any questions about this Progress Report, or generally about this facility, please phone me at 503-452-5561 or email me at LynnG@EVREN-NW.com.

Regards,


Lynn D. Green, C.E.G.
Project Manager

CC: Marcus Lampros, Johnson-Lampros Warehouse LLC
Dave Johnson, Johnson-Lampros Warehouse LLC