

July 23, 2024

Via Electronic Mail

Mr. Ray Hoy  
Oregon Department of Environmental Quality – Northwest Region  
700 NE Multnomah St, Suite 600  
Portland, OR 97232

**SUBJECT: SECOND QUARTER 2024 PROGRESS REPORT  
(April through June 2024)  
Vigor Industrial LLC**

Dear Mr. Hoy:

Floyd|Snider is submitting this Quarterly Progress Report (QPR) on behalf of Vigor Industrial LLC (Vigor) to summarize stormwater source control activities performed during the second quarter of 2024 at the Vigor facility located at 5555 N. Channel Avenue in Portland, Oregon. This report also summarizes National Pollutant Discharge Elimination System (NPDES) 1200-Z Permit compliance activities conducted during the fourth quarter (April through June) of the 2023/2024 monitoring year.

Paragraph 7(H) of the Order on Consent between the Oregon Department of Environmental Quality (ODEQ) and Vigor (ODEQ No. OPV-NWR-16-05), dated December 19, 2016 (Consent Order), requires submittal of QPRs. The following progress report summarizes activities for the second quarter of 2024 (April 1 through June 30, 2024).

**ACTIONS TAKEN DURING THE SECOND QUARTER OF 2024**

**Consent Order Requirements**

- Vigor received U.S. Environmental Protection Agency (USEPA) and ODEQ comments for the 2022 Monitoring and Performance Evaluation Report on April 3, 2024.
- Vigor submitted the Post-Phase 1 and Phase 2 EC System Sampling Work Plan memo on April 10, 2024.
- Vigor submitted a revision to the 2022 Monitoring and Performance Evaluation on June 28, 2024. The revision addressed comments received from USEPA and ODEQ.

**National Pollutant Discharge Elimination System Permit Requirements**

- On May 14, 2024, Vigor submitted its Discharge Monitoring Report (DMR) for the third quarter (January to March 2024) of the 2023/2024 monitoring year in accordance with the NPDES 1200-Z Permit.

- Vigor completed Year 3 Monitoring in accordance with the NPDES 1200-Z Permit.

#### **ACTIONS SCHEDULED FOR THE THIRD QUARTER OF 2024**

- Vigor will submit the DMR for the fourth quarter (April to June 2024) of the NPDES 1200-Z Permit by August 15, 2023.
- Vigor will conduct stormwater sampling during the first quarter (July to September 2024) of the 2024/2025 monitoring year per the NPDES 1200-Z Permit.
- Vigor will continue monitoring contingency source control measures as described in the approved Source Control Measure Monitoring Plan (Appendix G of the Revised Monitoring and Performance Evaluation Report [MPER]).
- Vigor will monitor the electrocoagulation stormwater treatment system (EC system) as described in the Post-Phase 1 and Phase 2 EC System Sampling Work Plan which was submitted to ODEQ on April 10, 2024.

#### **SUMMARY OF DATA COLLECTED AND ACTIONS TAKEN**

- Stormwater grab samples were collected during storm events in April. One sample each was collected from Group M, Basin R, Group P, Group Q, Pier C, and Basin O. Analytical results are shown in the enclosed Table 1.
- Stormwater performance monitoring samples were collected from the EC system in Group Q, a scupper insert in Pier C, and Rain Barrel 5 and Rain Barrel 6 in Basin R during the second quarter of 2024. Analytical results are shown in the enclosed Table 2.

Sincerely,

FLOYD | SNIDER



Adia Jumper, PE  
Project Manager

Encl.     Table 1 Stormwater Grab Sample Analytical Data  
           Table 2 Stormwater Performance Monitoring Sample Analytical Data  
Copies:   Harrison Holzgang, Vigor Industrial LLC  
           Alan Sprott, Vigor Industrial LLC  
           David Lacey, Oregon Department of Environmental Quality  
           Laura Hanna, USEPA Region X  
           Angelica Greene, City of Portland Bureau of Environmental Services