

April 24, 2025

Via Electronic Mail

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

**SUBJECT: FIRST QUARTER 2025 PROGRESS REPORT
(January through March 2025)
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 first quarter of 2025 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 third quarter (January through March) of the 2024/2025 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 first quarter of 2025 (January 1 through March 31, 2025).

ACTIONS TAKEN DURING THE FIRST QUARTER OF 2025

Consent Order Requirements

- A new sweeping vendor began conducting weekly sweeping of the facility at the beginning of January.
- Replacement of leaking seals in Pier D scupper inserts was shown to be effective during early January. Seal replacement throughout the pier was completed in March.
- Repair and reinforcement of the silt fence along the Tycom Fiber Yard and Group N-Series basin was performed between January and March 2025.
- During the week of February 17, 2025, zeolite media was replaced throughout Pier C.
- On March 20, 2025, rain barrels and Grattix boxes were tested individually to determine if the roof is the source of elevated levels of copper observed in the Group R basin.

National Pollutant Discharge Elimination System Permit Requirements

- On January 20, 2025, Vigor submitted its Discharge Monitoring Report (DMR) for the second quarter (October to December 2024) of the 2024/2025 monitoring year in accordance with the NPDES 1200-Z Permit.
- On January 29, 2025, Vigor updated its Stormwater Pollution Prevention and Control Plan (SWPCP) to reflect current treatment system operations and maintenance performed at the facility.
- Vigor continued Year 4 Monitoring in accordance with the NPDES 1200-Z Permit.
- In March 2025, new aluminum/iron anodes were ordered for the electrocoagulation (EC) system in response to elevated copper concentrations measured in EC system discharge on February 24, 2025.
- On March 12, 2025, City of Portland Bureau of Environmental Services (BES) staff conducted a site visit of the facility.
- On March 21, 2025, Vigor completed its 1200-Z Permit Annual Inspection Documents submission to BES.

ACTIONS SCHEDULED FOR THE SECOND QUARTER OF 2025

- Vigor will submit the DMR for the third quarter (January to March 2025) of the NPDES 1200-Z Permit by May 15, 2025.
- Vigor will conduct stormwater sampling during the fourth quarter (April to June 2025) 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 2022 Monitoring and Performance Evaluation Report).
- Vigor will install the new aluminum/iron anodes and monitor the EC stormwater treatment 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.
- Vigor will report the results of dioxin/furan sample analyses performed during this quarter after the receipt of validated data.

SUMMARY OF DATA COLLECTED AND ACTIONS TAKEN

- Stormwater grab samples were collected during storm events in February and March. Two representative samples of each storm event were collected from Group R, Group P, Pier D (PD29), Pier D (PD42), Pier C, and Basin O. One representative sample of each storm event was collected from Group M, Group Q, Series N6, and Basin T. 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; Pier D (PD29 and PD 42); Series N6; Rain Barrels 2, 3, 5, and 8; and one Grattix box in Group R during the first quarter of 2025. Analytical results and removal efficiency data are shown in Table 2.
- Additionally, stormwater performance monitoring samples were collected from Pier C and Series N6 on February 24, 2025, and from Pier C on March 20, 2025, and were analyzed for dioxins/furans. Results from these analyses were submitted to EcoChem for Stage 2B data validation.

Sincerely,
FLOYD | SNIDER



Emily Jones, PE
Associate Principal, Director of Quality

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

Table 1
Stormwater Grab Sample Analytical Data

| Location Name | | | | | Group M | Outfall R | | | Group P | | Group Q | Pier D (PD29) | | Pier D (PD42) | |
|---------------------------------------|-----------|---|---|------|---------------|---------------|---------------|---------------|---------------|-------------------|-------------------|-------------------|-------------------|-------------------|--|
| Sample Name | | | | | M(001)-031425 | R(004)-022425 | R(004)-032025 | P(005)-022425 | P(005)-032025 | Q(007)-022525-EFF | PD-29(008)-022425 | PD-29(008)-031425 | PD-42(010)-022425 | PD-42(010)-031425 | |
| Sample Date | | | | | 3/14/2025 | 2/24/2025 | 3/20/2025 | 2/24/2025 | 3/20/2025 | 2/25/2025 | 2/24/2025 | 3/14/2025 | 2/24/2025 | 3/14/2025 | |
| Analyte ⁽¹⁾ | CAS No. | Consent Order Screening Criteria ⁽²⁾ | 2021 to 2025 1200-Z Permit Benchmarks/ Impairment Reference Concentrations ⁽³⁾ | Unit | | | | | | | | | | | |
| Conventionals | | | | | | | | | | | | | | | |
| pH | pH | -- | -- | S.U. | 7.45 | 7.57 | 7.26 | 6.41 | 7.41 | 6.59 | 7.60 | 8.06 | 7.77 | 8.08 | |
| Nitrate + Nitrite (as Nitrogen) | -- | -- | 10 | mg/L | | | | | | 0.0560 J | | | | | |
| Total Suspended Solids | TSS | -- | 30 | mg/L | 15.0 | 15.0 | <10.0 | <10.0 | <10.0 | <10.0 | <10.0 | <10.0 | <10.0 | 16.0 | |
| Total Metals | | | | | | | | | | | | | | | |
| Aluminum | 7429-90-5 | 87 | 1,100 | µg/L | | | | | | 39.2 | | | | | |
| Arsenic | 7440-38-2 | 0.018 | -- | µg/L | | | | | | <0.100 | | | | | |
| Copper | 7440-50-8 | 2.7 | 15 | µg/L | 26.1 | 160 | 94.0 | 9.80 | 12.8 | 15.6 | 15.2 | 18.3 | 21.4 | 47.8 | |
| Iron | 7439-89-6 | -- | 10,000 | µg/L | | | | | | 1,800 | 120 | 128 | 207 | 694 | |
| Lead | 7439-92-1 | 0.54 | 240 | µg/L | | | | | | 0.374 | | | | | |
| Zinc | 7440-66-6 | 36 | 240 | µg/L | | 240 | 195 | | | 63.4 | | | | | |
| Semivolatile Organic Compounds | | | | | | | | | | | | | | | |
| Bis(2-ethylhexyl)phthalate | 117-81-7 | 0.2 | -- | µg/L | | | | | | 0.149 J | | | | | |

Notes:

Blank cells are intentional.

-- Not applicable.

Italics Non-detect exceedance of the benchmark.

RED/BOLD Detected exceedance of the screening criterion.

RED/BOLD Detected exceedance of both the screening criterion and the benchmark.

1 Parameters listed are those specified in the Consent Order for requiring source control.

2 Screening Criteria of CULs presented in Table 17 of the 2017 USEPA Portland Harbor Record of Decision or screening level values from Table 3-1 of ODEQ's 2005 Joint Source Control Strategy where a CUL does not exist.

3 Benchmarks and Impairment Pollutant Reference Concentrations as presented in Vigor's 2021–2025 National Pollutant Discharge Elimination System 1200-Z General Industrial Stormwater Permit No. 70596.

Abbreviations:

CAS Chemical Abstracts Service

CUL Cleanup level

µg/L Micrograms per liter

mg/L Milligrams per liter

ODEQ Oregon Department of Environmental Quality

S.U. Standard units

USEPA U.S. Environmental Protection Agency

Qualifiers:

< Analyte was not detected at the given method detection limit.

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Table 1
Stormwater Grab Sample Analytical Data

| Location Name | | | | Pier C | | Basin O | | Group N | Outfall T | B10GB16 | B72RB5 | RB2 | RB3 | RB8 |
|---------------------------------------|-----------|---|---|-------------------|-------------------|---------------|---------------|----------------|-----------|---------------|----------------|----------------|----------------|----------------|
| Sample Name | | | | PierC(009)-022425 | PierC(009)-032025 | O(013)-022425 | O(013)-031425 | N6(011)-022425 | T-032025 | GB-032025-EFF | RB5-032025-EFF | RB2-032025-EFF | RB3-032025-EFF | RB8-032025-EFF |
| Sample Date | | | | 2/24/2025 | 3/20/2025 | 2/24/2025 | 3/14/2025 | 2/24/2025 | 3/20/2025 | 3/20/2025 | 3/20/2025 | 3/20/2025 | 3/20/2025 | 3/20/2025 |
| Analyte ⁽¹⁾ | CAS No. | Consent Order Screening Criteria ⁽²⁾ | 2021 to 2025 1200-Z Permit Benchmarks/ Impairment Reference Concentrations ⁽³⁾ | Unit | | | | | | | | | | |
| Conventionals | | | | | | | | | | | | | | |
| pH | pH | -- | -- | S.U. | 8.10 | 7.01 | 7.04 | 6.98 | 7.04 | | | | | |
| Nitrate + Nitrite (as Nitrogen) | -- | -- | 10 | mg/L | | | | | | | | | | |
| Total Suspended Solids | TSS | -- | 30 | mg/L | <10.0 | <10.0 | 15.0 | 13.0 | <10.0 | 20.0 | | | | |
| Total Metals | | | | | | | | | | | | | | |
| Aluminum | 7429-90-5 | 87 | 1,100 | µg/L | | | | | | | | | | |
| Arsenic | 7440-38-2 | 0.018 | -- | µg/L | | | | | | | | | | |
| Copper | 7440-50-8 | 2.7 | 15 | µg/L | 9.00 | 23.8 | 89.4 | 15.0 | | 278 | 5.65 | 20.1 | 18.5 | 16.8 |
| Iron | 7439-89-6 | -- | 10,000 | µg/L | 75.3 | <50.0 | | | | 1,210 | | | | |
| Lead | 7439-92-1 | 0.54 | 240 | µg/L | | | | | | | | | | |
| Zinc | 7440-66-6 | 36 | 240 | µg/L | | | | | | 439 | 651 | 111 | 134 | 138 |
| Semivolatile Organic Compounds | | | | | | | | | | | | | | |
| Bis(2-ethylhexyl)phthalate | 117-81-7 | 0.2 | -- | µg/L | | | | | | 1.33 | | | | |

Notes:

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CUL Cleanup level

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S.U. Standard units

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Table 2
Stormwater Performance Monitoring Sample Analytical Data

| Location Name | | | | | Group Q | | | Pier D (PD29) | | | Pier D (PD42) | | |
|---------------------------------------|-----------|---|---|------|-------------------|-------------------|-----------------------------------|-----------------------|-------------------|-----------------------------------|-----------------------|-------------------|-----------------------------------|
| Source Control Measure | | | | | EC System | | Removal Efficiency ⁽¹⁾ | Scupper Insert | | Removal Efficiency ⁽¹⁾ | Scupper Insert | | Removal Efficiency ⁽¹⁾ |
| Sample Name | | | | | Q(007)-022525-INF | Q(007)-022525-EFF | | PD-29(008)-031425-INF | PD-29(008)-031425 | | PD-42(010)-031425-INF | PD-42(010)-031425 | |
| Sample Date | | | | | 2/25/2025 | 2/25/2025 | | 3/14/2025 | 3/14/2025 | | 3/14/2025 | 3/14/2025 | |
| Analyte ⁽²⁾ | CAS No. | Consent Order Screening Criteria ⁽³⁾ | 2021 to 2025 1200-Z Permit Benchmarks/ Impairment Reference Concentrations ⁽⁴⁾ | Unit | | | | | | | | | |
| Conventionals | | | | | | | | | | | | | |
| pH | pH | -- | -- | S.U. | 7.28 | 6.59 | 9.5% | | 8.06 | | 8.08 | | |
| Nitrate + Nitrite (as Nitrogen) | -- | -- | 10 | mg/L | 0.0570 J | 0.0560 J | 2% | | | | | | |
| Total Suspended Solids | TSS | -- | 30 | mg/L | 18.0 | <10.0 | 80% | | <10.0 | | 16.0 | | |
| Total Metals | | | | | | | | | | | | | |
| Aluminum | 7429-90-5 | 87 | 1,100 | µg/L | 277 | 39.2 | 86% | | | | | | |
| Arsenic | 7440-38-2 | 0.018 | -- | µg/L | <1.00 | <0.100 | | | | | | | |
| Copper | 7440-50-8 | 2.7 | 15 | µg/L | 111 | 15.6 | 86% | 55.4 | 18.3 | 67% | 68.3 | 47.8 30% | |
| Iron | 7439-89-6 | -- | 10,000 | µg/L | 3,330 | 1,800 | 46% | 653 | 128 | 80% | 1,050 | 694 34% | |
| Lead | 7439-92-1 | 0.54 | 240 | µg/L | 2.68 | 0.374 | 86% | | | | | | |
| Zinc | 7440-66-6 | 36 | 240 | µg/L | 528 | 63.4 | 88% | | | | | | |
| Semivolatile Organic Compounds | | | | | | | | | | | | | |
| Bis(2-ethylhexyl)phthalate | 117-81-7 | 0.2 | -- | µg/L | 0.320 J | 0.149 J | 53% | | | | | | |

Notes:

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- Not applicable.
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Table 2
Stormwater Performance Monitoring Sample Analytical Data

| Location Name | | | | | Pier C | | | | | | Group N | | |
|---------------------------------------|-----------|---|---|------|-----------------------|-------------------|-----------------------------------|-----------------------|-------------------|-----------------------------------|--------------------|----------------|-----------------------------------|
| Source Control Measure | | | | | Scupper Insert | | Removal Efficiency ⁽¹⁾ | Scupper Insert | | Removal Efficiency ⁽¹⁾ | Catch Basin Insert | | Removal Efficiency ⁽¹⁾ |
| Sample Name | | | | | PierC(009)-022425-inf | PierC(009)-022425 | | PierC(009)-032025-inf | PierC(009)-032025 | | N6(011)-022425-inf | N6(011)-022425 | |
| Sample Date | | | | | 2/24/2025 | 2/24/2025 | 3/20/2025 | 3/20/2025 | 2/24/2025 | 2/24/2025 | | | |
| Analyte ⁽²⁾ | CAS No. | Consent Order Screening Criteria ⁽³⁾ | 2021 to 2025 1200-Z Permit Benchmarks/ Impairment Reference Concentrations ⁽⁴⁾ | Unit | | | | | | | | | |
| Conventionals | | | | | | | | | | | | | |
| pH | pH | -- | -- | S.U. | 7.90 | 8.10 | | | 7.01 | | 7.12 | 7.04 | |
| Nitrate + Nitrite (as Nitrogen) | -- | -- | 10 | mg/L | | | | | | | | | |
| Total Suspended Solids | TSS | -- | 30 | mg/L | <10.0 | <10.0 | | <10.0 | <10.0 | | <10.0 | <10.0 | |
| Total Metals | | | | | | | | | | | | | |
| Aluminum | 7429-90-5 | 87 | 1,100 | µg/L | | | | | | | | | |
| Arsenic | 7440-38-2 | 0.018 | -- | µg/L | | | | | | | | | |
| Copper | 7440-50-8 | 2.7 | 15 | µg/L | 16.1 | 9.00 | 44% | | 23.8 | | | | |
| Iron | 7439-89-6 | -- | 10,000 | µg/L | 174 | 75.3 | 57% | | <50.0 | | | | |
| Lead | 7439-92-1 | 0.54 | 240 | µg/L | | | | | | | | | |
| Zinc | 7440-66-6 | 36 | 240 | µg/L | | | | | | | | | |
| Semivolatile Organic Compounds | | | | | | | | | | | | | |
| Bis(2-ethylhexyl)phthalate | 117-81-7 | 0.2 | -- | µg/L | | | | | | | | | |

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Table 2
Stormwater Performance Monitoring Sample Analytical Data

| Location Name | | | | | B10GB16 | | | B72RB5 | | | RB2 | | |
|---------------------------------------|-----------|---|---|------|-------------------|-------------------|-----------------------------------|--------------------|--------------------|-----------------------------------|--------------------|--------------------|-----------------------------------|
| Source Control Measure | | | | | Grattix Box | | Removal Efficiency ⁽¹⁾ | Roof Barrel | | Removal Efficiency ⁽¹⁾ | Roof Barrel | | Removal Efficiency ⁽¹⁾ |
| Sample Name | | | | | GB-032025- INF | GB-032025- EFF | | RB5-032025- INF | RB5-032025- EFF | | RB2-032025- INF | RB2-032025- EFF | |
| Sample Date | | | | | 3/20/2025 | 3/20/2025 | | 3/20/2025 | 3/20/2025 | | 3/20/2025 | 3/20/2025 | |
| Analyte ⁽²⁾ | CAS No. | Consent Order Screening Criteria ⁽³⁾ | 2021 to 2025 1200-Z Permit Benchmarks/ Impairment Reference Concentrations ⁽⁴⁾ | Unit | | | | | | | | | |
| Conventionals | | | | | | | | | | | | | |
| pH | pH | -- | -- | S.U. | | | | | | | | | |
| Nitrate + Nitrite (as Nitrogen) | -- | -- | 10 | mg/L | | | | | | | | | |
| Total Suspended Solids | TSS | -- | 30 | mg/L | | | | | | | | | |
| Total Metals | | | | | | | | | | | | | |
| Aluminum | 7429-90-5 | 87 | 1,100 | µg/L | | | | | | | | | |
| Arsenic | 7440-38-2 | 0.018 | -- | µg/L | | | | | | | | | |
| Copper | 7440-50-8 | 2.7 | 15 | µg/L | 13.5 | 5.65 | 58% | 2,490 | 20.1 | 99% | 67.0 | 18.5 72% | |
| Iron | 7439-89-6 | -- | 10,000 | µg/L | | | | | | | | | |
| Lead | 7439-92-1 | 0.54 | 240 | µg/L | | | | | | | | | |
| Zinc | 7440-66-6 | 36 | 240 | µg/L | 158 | 651 | -312% | 807 | 111 | 86% | 163 | 134 18% | |
| Semivolatile Organic Compounds | | | | | | | | | | | | | |
| Bis(2-ethylhexyl)phthalate | 117-81-7 | 0.2 | -- | µg/L | | | | | | | | | |

Notes:

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Table 2
Stormwater Performance Monitoring Sample Analytical Data

| Location Name | | | | | RB3 | | | RB8 | | |
|---------------------------------------|-----------|---|---|------|--------------------|--------------------|-----------------------------------|--------------------|--------------------|-----------------------------------|
| Source Control Measure | | | | | Roof Barrel | | Removal Efficiency ⁽¹⁾ | Roof Barrel | | Removal Efficiency ⁽¹⁾ |
| Sample Name | | | | | RB3-032025- INF | RB3-032025- EFF | | RB8-032025- INF | RB8-032025- EFF | |
| Sample Date | | | | | 3/20/2025 | 3/20/2025 | | 3/20/2025 | 3/20/2025 | |
| Analyte ⁽²⁾ | CAS No. | Consent Order Screening Criteria ⁽³⁾ | 2021 to 2025 1200-Z Permit Benchmarks/ Impairment Reference Concentrations ⁽⁴⁾ | Unit | | | | | | |
| Conventionals | | | | | | | | | | |
| pH | pH | -- | -- | S.U. | | | | | | |
| Nitrate + Nitrite (as Nitrogen) | -- | -- | 10 | mg/L | | | | | | |
| Total Suspended Solids | TSS | -- | 30 | mg/L | | | | | | |
| Total Metals | | | | | | | | | | |
| Aluminum | 7429-90-5 | 87 | 1,100 | µg/L | | | | | | |
| Arsenic | 7440-38-2 | 0.018 | -- | µg/L | | | | | | |
| Copper | 7440-50-8 | 2.7 | 15 | µg/L | 57.0 | 16.8 | 71% | 39.2 | 8.32 | 79% |
| Iron | 7439-89-6 | -- | 10,000 | µg/L | | | | | | |
| Lead | 7439-92-1 | 0.54 | 240 | µg/L | | | | | | |
| Zinc | 7440-66-6 | 36 | 240 | µg/L | 182 | 138 | 24% | 167 | 111 | 34% |
| Semivolatile Organic Compounds | | | | | | | | | | |
| Bis(2-ethylhexyl)phthalate | 117-81-7 | 0.2 | -- | µg/L | | | | | | |

Notes:

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