



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

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*via electronic mail*

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Re: 2025 Annual Inspection, Operations, and Maintenance Report  
Former Columbia Steel/Joslyn Facility  
ECSI #104 and #23

All:

DEQ Cleanup Program staff reviewed the *2024 Annual Inspection, Operations, and Maintenance Report* prepared by ERM for Joslyn Manufacturing Company, LLC and dated May 2025. The report documents the results of cap inspection activities completed for the Center Pond portion of the former Columbia Steel/Joslyn Manufacturing site, identified in DEQ Cleanup Program files as ECSI#104 and #23. The report is approved without revision.

Inspection was completed as required under the Section 6.3 of the *Center Pond Interim Removal Action Plan* (ERM 2015) approved by DEQ. The 2025 report documents the results of multiple inspections of the Center Pond Cap feature in 2024. Results are presented in the form of explanatory text, inspection checklists, and photographs. A 2024 access agreement between current property owner PORT OR, LLC and former owner Joslyn is included with the report. Section 4.4 of the report documents responsibilities for future operations and maintenance work including inspection and reporting of results to DEQ. PORT OR, LLC is indicated as being response for all tasks excluding any cap repairs (if needed) due to design or construction defect.

Section 6 of the report recommends, moving forward, submission of Operations and Maintenance Reports for the Center Pond every three years based on annual inspection work, after completion and submission of an annual report for 2025. DEQ approves submission of reports every two years based on annual inspection events, provided that future inspection events show that that contaminated soil in the Center Pond containment feature continues to be isolated from the surrounding environment with no significant structural or other compromise. If problems arise, say with the articulated concrete block cover, DEQ retains the right to reconsider monitoring and reporting frequency.

I can be reached at (503) 229-5417 if you have questions or comments.

Respectfully,

A handwritten signature in cursive script that reads "Daniel Hafley" followed by a horizontal line.

Daniel Hafley, RG  
Project Manager/Hydrogeologist  
NWR Cleanup Section

Ec: Chris Berg, ERM  
Brendan Robinson, ERM

Cc: DEQ NWR files ECSI #104 and #23