

Memorandum

To: Erin McDonnell, Oregon Department of Environmental Quality

Copies: Tom Graf, MMGL LLC

From: Sabine Datum, Kristin Anderson, and Allison Geiselbrecht, Floyd|Snider

Date: January 14, 2026

Project ID: MMGL-PEO

**Re: Quarter 4, 2025—Quarterly Progress Report (July through September 2025)
Premier Edible Oils Site (ECSI #2013)**

This memorandum presents the quarterly progress report for the period from October through December 2025 for the Premier Edible Oils (PEO) project site (Site) located at 10400 North Burgard Way in Portland, Oregon. This progress report is prepared in accordance with the March 6, 2001, Voluntary Agreement (ECDVC-NWR-01-06) between MMGL LLC (formerly Schnitzer Investment Corp.) and the Oregon Department of Environmental Quality (ODEQ).

WORK COMPLETED JULY THROUGH SEPTEMBER 2025

- Submitted the third quarter 2025 Quarterly Progress Report on October 13, 2025.
- Performed semiannual groundwater depth measurements on October 28, and semiannual groundwater monitoring on October 28 through 30.
- Collected additional groundwater samples from monitoring wells MW-38, MW-39, and MW-43 on October 30 for hydrocarbon identification, and anions and dissolved gases analyses to support the proposed remediation pilot study at the Site. Samples were shipped to AST Environmental in Golden, Colorado.
- Submitted a Remediation Pilot Study Work Plan Memorandum to ODEQ on November 13.
- Performed monthly maintenance of the air sparge system in October, November, and December 2025. Monthly maintenance logs are included in Attachment 1.

ACTIVITIES PLANNED JANUARY THROUGH MARCH 2026

- Perform monthly maintenance activities of air sparge system.
- Perform optimization activities, as necessary, for air sparge system.

- Submit the 2025 Groundwater Monitoring Data Report to ODEQ.
- Meet with ODEQ on January 20 to discuss the Remediation Pilot Study Work Plan.
- Apply for Underground Injection Control (UIC) permit in preparation for the remediation pilot study.
- Receive ODEQ comments on the Remediation Pilot Study Work Plan.
- Prepare for and perform remediation pilot study following approval by ODEQ and obtaining the UIC permit.

SAMPLING, TEST RESULTS, AND OTHER DATA GENERATED FROM OCTOBER THROUGH DECEMBER 2025

- Received October 2025 groundwater monitoring analytical data and commenced data validation.

PROBLEMS EXPERIENCED OCTOBER THROUGH DECEMBER 2025

- None.

Please contact me if you have questions regarding the content of this project status report.

LIST OF ATTACHMENTS

Attachment 1 Q4 2025 Air Sparge Maintenance Logs

Attachment 1
Q4 2025 Air Sparge Maintenance Logs

Monthly Inspection Checklist

Date: 10.31.2025

PEO Air Sparge Matt Slobig

System Function	Deep blower Hour	7,222			
	Deep blower speed	75%			
	Shallow blower Hour	26,315			
	Shallow blower speed	75%			
	Deep Heat Exchanger Hour	50,751			
	Shallow Heat exchanger Hour	26,319			
Inspection Area	Inspection Item	Y	N	N/A	Comments
Trailer	Trailer Secure?	x			
	Warning system connected to internet?	x			
	Warning system working?	x			
Inspection Area	Inspection Item	Y	N	N/A	Comments
Air Sparge System	Oil change?		x		
	Is shallow zone operating upon arrival?	x			
	Is deep zone operating upon arrival?	x			
	Is above ground piping free from damage?	x			
Inspection Area	Inspection Item	Y	N	N/A	Comments
Air Filters	Air filters change out Deep System	x			
	Air Filter Change out Shallow System	x			
	Are gaskets present and in good condition?	x			
Inspection Area	Inspection Item	Y	N	N/A	Comments
General Site	Is site clean of trash and debris?	x			
	Is there any evidence of construction equipment / vehicles entering exclusion area?	x			
	Is there evidence of leaks / drips / spills?	x			
Inspection Area	Inspection Item	Y	N	N/A	Comments
System Optimization Tasks	Clean Meters		x		
	Air Sparge Wells Cleaning?		x		
Inspection Area	Inspection Item	Y	N	N/A	Comments
IDW	How many drums onsite?	Purge Water:	2		Product:
	Are all drums labeled with appropriate non-hazardous waste label?			X	
	Are non-hazardous waste labels filled out correctly?	X			#59 #58
	Are drums sealed?	X			
	Are liquids stored in closed-top drums only?	X			
	Are drums oriented upright and free from leaks?	X			
Notes:					
system is working like it should installed new motion light above main door					

Monthly Inspection Checklist

Date: 11.30.25

PEO Air Sparge Matt Slobig

System Function	Deep blower Hour	7,989			
	Deep blower speed	75%			
	Shallow blower Hour	27,083			
	Shallow blower speed	75%			
	Deep Heat Exchanger Hour	51,518			
	Shallow Heat exchanger Hour	27,086			
Inspection Area	Inspection Item	Y	N	N/A	Comments
Trailer	Trailer Secure?	x			
	Warning system connected to internet?	x			
	Warning system working?	x			
Inspection Area	Inspection Item	Y	N	N/A	Comments
Air Sparge System	Oil change?		x		
	Is shallow zone operating upon arrival?	x			
	Is deep zone operating upon arrival?	x			
	Is above ground piping free from damage?	x			
Inspection Area	Inspection Item	Y	N	N/A	Comments
Air Filters	Air filters change out Deep System	x			
	Air Filter Change out Shallow System	x			
	Are gaskets present and in good condition?	x			
Inspection Area	Inspection Item	Y	N	N/A	Comments
General Site	Is site clean of trash and debris?	x			
	Is there any evidence of construction equipment / vehicles entering exclusion area?	x			
	Is there evidence of leaks / drips / spills?	x			
Inspection Area	Inspection Item	Y	N	N/A	Comments
System Optimization Tasks	Clean Meters		x		
	Air Sparge Wells Cleaning?		x		
Inspection Area	Inspection Item	Y	N	N/A	Comments
IDW	How many drums onsite?	Purge Water:	2		Product:
	Are all drums labeled with appropriate non-hazardous waste label?			X	
	Are non-hazardous waste labels filled out correctly?	X			#59 #58
	Are drums sealed?	X			
	Are liquids stored in closed-top drums only?	X			
	Are drums oriented upright and free from leaks?	X			
Notes:					

Monthly Inspection Checklist

Date: 12/29/25

PEO Air Sparge Matt Slobig

System Function	Deep blower Hour	8811			
	Deep blower speed	75%			
	Shallow blower Hour	27904			
	Shallow blower speed	75%			
	Deep Heat Exchanger Hour	52339			
	Shallow Heat exchanger Hour	27,907			
Inspection Area	Inspection Item	Y	N	N/A	Comments
Trailer	Trailer Secure?	x			
	Warning system connected to internet?	x			
	Warning system working?	x			
Inspection Area	Inspection Item	Y	N	N/A	Comments
Air Sparge System	Oil change?		x		
	Is shallow zone operating upon arrival?	x			
	Is deep zone operating upon arrival?	x			
	Is above ground piping free from damage?	x			
Inspection Area	Inspection Item	Y	N	N/A	Comments
Air Filters	Air filters change out Deep System	x			
	Air Filter Change out Shallow System	x			
	Are gaskets present and in good condition?	x			
Inspection Area	Inspection Item	Y	N	N/A	Comments
General Site	Is site clean of trash and debris?	x			
	Is there any evidence of construction equipment / vehicles entering exclusion area?	x			
	Is there evidence of leaks / drips / spills?	x			
Inspection Area	Inspection Item	Y	N	N/A	Comments
System Optimization Tasks	Clean Meters		x		
	Air Sparge Wells Cleaning?		x		
Inspection Area	Inspection Item	Y	N	N/A	Comments
IDW	How many drums onsite?	Purge Water:	2		Product:
	Are all drums labeled with appropriate non-hazardous waste label?			X	
	Are non-hazardous waste labels filled out correctly?	X			#59 #58
	Are drums sealed?	X			
	Are liquids stored in closed-top drums only?	X			
	Are drums oriented upright and free from leaks?	X			
Notes:					
The system is working great. There is one blue drum full of liquid that is not labeled					