

# 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:** October 13, 2025

**Project ID:** MMGL-PEO

**Re: Quarter 3, 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 July through September 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 (formerly Schnitzer Investment Corp.) and the Oregon Department of Environmental Quality (ODEQ).

## **WORK COMPLETED JULY THROUGH SEPTEMBER 2025**

- Submitted the Q2 2025 Quarterly Progress Report on July 10, 2025.
- Performed monthly maintenance of the air sparge system in July, August, and September 2025. Monthly maintenance logs are included in Attachment 1.
- Replaced air sparge trailer fan on July 28. The sparge system was down during July due to overheating caused by the fan failure.
- Installed new fuses for fan on August 22. The system was on intermittently until August 22 and worked properly the rest of August and September after fuse replacement.
- Removed absorbent socks from monitoring wells on August 6 to observe the rate of non-aqueous phase liquid (NAPL) accumulation.
- Checked NAPL accumulation in select groundwater monitoring wells (MW-38, MW-39, and MW-43) on August 15, August 22, and September 24, following removal of absorbent socks. No NAPL was observed during the visits.

#### **ACTIVITIES PLANNED OCTOBER THROUGH DECEMBER 2025**

- Continue investigating current electrical issues with the air sparge system.
- Perform air sparge system monthly maintenance activities.
- Perform air sparge system optimization activities, as necessary.
- Perform semiannual groundwater monitoring in October.

#### **SAMPLING, TEST RESULTS, AND OTHER DATA GENERATED JULY THROUGH SEPTEMBER 2025**

- Completed data validation and database load of the analytical results from the May 2025 groundwater monitoring.

#### **PROBLEMS EXPERIENCED JULY THROUGH SEPTEMBER 2025**

- None.

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

#### **LIST OF ATTACHMENTS**

Attachment 1 Q3 2025 Air Sparge Maintenance Logs

**Attachment 1**  
**Q3 2025 Air Sparge Maintenance Logs**

# Monthly Inspection Checklist

Date: 7.30.2025

PEO Air Sparge Matt Slobig

<b>System Function</b>	Deep blower Hour	5626			
	Deep blower speed	75%			
	Shallow blower Hour	24954			
	Shallow blower speed	75%			
	Deep Heat Exchanger Hour	49155			
	Shallow Heat exchanger Hour	24957			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>Trailer</b>	Trailer Secure?	x			
	Warning system connected to internet?	x			
	Warning system working?	x			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>Air Sparge System</b>	Oil change?		x		Next Month
	Is shallow zone operating upon arrival?		x		
	Is deep zone operating upon arrival?		x		
	Is above ground piping free from damage?	x			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>Air Filters</b>	Air filters change out Deep System	x			
	Air Filter Change out Shallow System	x			
	Are gaskets present and in good condition?	x			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>General Site</b>	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			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>System Optimization Tasks</b>	Clean Meters		x		
	Air Sparge Wells Cleaning?		x		
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>IDW</b>	How many drums onsite?	Purge Water: 1.5			Product: 1
	Are all drums labeled with appropriate non-hazardous waste label?		X		
	Are non-hazardous waste labels filled out correctly?		X		
	Are drums sealed?	X			
	Are liquids stored in closed-top drums only?	X			
	Are drums oriented upright and free from leaks?	X			
<b>Notes:</b>					
System has been off due to exhaust fan going out we got the motor know waiting on the fan bladed they have been back ordered should be arriving in 2 weeks					

# Monthly Inspection Checklist

Date: 8.30.2025

PEO Air Sparge Matt Slobig

<b>System Function</b>	Deep blower Hour	6033			
	Deep blower speed	75%			
	Shallow blower Hour	25126			
	Shallow blower speed	75%			
	Deep Heat Exchanger Hour	49562			
	Shallow Heat exchanger Hour	25126			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>Trailer</b>	Trailer Secure?	x			
	Warning system connected to internet?	x			
	Warning system working?	x			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>Air Sparge System</b>	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			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>Air Filters</b>	Air filters change out Deep System	x			
	Air Filter Change out Shallow System	x			
	Are gaskets present and in good condition?	x			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>General Site</b>	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			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>System Optimization Tasks</b>	Clean Meters		x		
	Air Sparge Wells Cleaning?		x		
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>IDW</b>	How many drums onsite?				Purge Water: 1.5 Product: 1
	Are all drums labeled with appropriate non-hazardous waste label?		X		
	Are non-hazardous waste labels filled out correctly?		X		
	Are drums sealed?	X			
	Are liquids stored in closed-top drums only?	X			
	Are drums oriented upright and free from leaks?	X			

**Notes:**

system was turned back on once new blades were installed ran for a couple days when i arrived noticed system was off due to overheating found that fan was not working shut system down had electrician come out, and we found the new fan motor we install was pulling a couple more amps than the old one had to replace the fuses due to hi temps outside left system off for most of the month may need to look at upgrading exhaust system

# Monthly Inspection Checklist

Date: 9.30.2025

PEO Air Sparge Matt Slobig

<b>System Function</b>	Deep blower Hour	6720			
	Deep blower speed	75%			
	Shallow blower Hour	25816			
	Shallow blower speed	75%			
	Deep Heat Exchanger Hour	50249			
	Shallow Heat exchanger Hour	25813			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>Trailer</b>	Trailer Secure?	x			
	Warning system connected to internet?	x			
	Warning system working?	x			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>Air Sparge System</b>	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			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>Air Filters</b>	Air filters change out Deep System	x			
	Air Filter Change out Shallow System	x			
	Are gaskets present and in good condition?	x			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>General Site</b>	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			
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>System Optimization Tasks</b>	Clean Meters		x		
	Air Sparge Wells Cleaning?		x		
<b>Inspection Area</b>	<b>Inspection Item</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Comments</b>
<b>IDW</b>	How many drums onsite?	Purge Water: 1.5			Product: 1
	Are all drums labeled with appropriate non-hazardous waste label?		X		
	Are non-hazardous waste labels filled out correctly?		X		
	Are drums sealed?	X			
	Are liquids stored in closed-top drums only?	X			
	Are drums oriented upright and free from leaks?	X			
<b>Notes:</b>					