

# 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:** July 10, 2025

**Project ID:** MMGL-PEO

**Re: Quarter 2, 2025—Quarterly Progress Report (April through June 2025)  
Premier Edible Oils Site (ECSI #2013)**

This memorandum presents the quarterly progress report for the period from April through June 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 APRIL THROUGH JUNE 2025

- Performed monthly maintenance of the air sparge system in April, May, and June 2025. Monthly maintenance logs are included in Attachment 1.
- Performed semiannual groundwater depth measurements on May 13, 2025, and semiannual groundwater monitoring between May 14 and May 22, 2025.
- Redeveloped monitoring well MW-11 on May 22, 2025.
- Prepared and submitted the Request for Confirmation of Assumptions for Future Ecological Risk Assessment memorandum to ODEQ on May 15, 2025.
- Submitted the excel version of data tables from the Request for Confirmation of Assumptions for Future Ecological Risk Assessment memorandum to ODEQ on June 26, 2025.

## ACTIVITIES PLANNED JULY THROUGH SEPTEMBER 2025

- Replace air sparge trailer fan in July.
- Perform air sparge system monthly maintenance activities.
- Perform air sparge system optimization activities, as necessary.

- Data validation of May 2025 groundwater analytical results and subsequent database loading.

#### **SAMPLING, TEST RESULTS, AND OTHER DATA GENERATED APRIL THROUGH JUNE 2025**

- Collected groundwater depth measurements from active monitoring wells on May 13, 2025.
- Collected semiannual groundwater samples between May 14 and May 22, 2025.
- Received analytical results from the May 2025 groundwater monitoring in June. Data validation is in progress, pending additional lab documentation.

#### **PROBLEMS EXPERIENCED APRIL THROUGH JUNE 2025**

- Access to the air sparge trailer and several wells was blocked by the current tenant during the May 2025 groundwater monitoring event, which delayed sampling.

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

#### **LIST OF ATTACHMENTS**

Attachment 1 Q2 2025 Air Sparge Maintenance Logs

**Attachment 1**  
**Q2 2025 Air Sparge Maintenance Logs**

# Monthly Inspection Checklist

Date: 4.11.2025

PEO Air Sparge Matt Slobig

<b>System Function</b>	Deep blower Hour	5003			
	Deep blower speed	75%			
	Shallow blower Hour	24673			
	Shallow blower speed	75%			
	Deep Heat Exchanger Hour	48531			
	Shallow Heat exchanger Hour	24676			
<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		Product:
	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 is looking good nothing to report					

# Monthly Inspection Checklist

Date: 5.28.2025

PEO Air Sparge Matt Slobig

<b>System Function</b>	Deep blower Hour	5479			
	Deep blower speed	75%			
	Shallow blower Hour	24846			
	Shallow blower speed	75%			
	Deep Heat Exchanger Hour	49008			
	Shallow Heat exchanger Hour	24850			
<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?			1.5	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 was of for 2 weeks due to Bridgwater taking water samples					

# Monthly Inspection Checklist

Date: 6.30.2025

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					
i did start the system today and will watch the temperature may have to turn off later this week					