

# 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:** April 8, 2025

**Project ID:** MMGL-PEO

**Re: Quarter 1, 2025—Quarterly Progress Report (January through March 2025)  
Premier Edible Oils Site (ECSI #2013)**

This memorandum presents the quarterly progress report for the period from January through March 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 JANUARY THROUGH MARCH 2025

- Performed monthly maintenance of the air sparge system in January, February, and March 2025. Monthly maintenance logs are included in Attachment 1.
- Met with ODEQ on February 6, 2025, to discuss the ecological risk assessment for the Site.
- Began development of an Ecological Risk Assessment Memorandum.
- Prepared and submitted the 2024 Annual Groundwater Performance Monitoring Data Report on March 21, 2025.

## ACTIVITIES PLANNED APRIL THROUGH JUNE 2025

- Redevelop well MW-11.
- Perform air sparge system monthly maintenance activities.
- Perform air sparge system optimization activities, as necessary.
- Finalize and submit the Ecological Risk Assessment Memorandum.
- Perform semiannual groundwater monitoring in April.

**SAMPLING, TEST RESULTS, AND OTHER DATA GENERATED JANUARY THROUGH MARCH 2025**

- None

**PROBLEMS EXPERIENCED JANUARY THROUGH MARCH 2025**

- None.

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

**LIST OF ATTACHMENTS**

Attachment 1 Q1 2025 Air Sparge Maintenance Logs

**Attachment 1**  
**Q1 2025 Air Sparge Maintenance Logs**

# Monthly Inspection Checklist

Date: 1.17.2025

PEO Air Sparge Matt Slobig

<b>System Function</b>	Deep blower Hour	2890			
	Deep blower speed	75%			
	Shallow blower Hour	22560			
	Shallow blower speed	75%			
	Deep Heat Exchanger Hour	46419			
	Shallow Heat exchanger Hour	22563			
<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?				
<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: 0 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>					

# Monthly Inspection Checklist

Date: 21.19.2025

PEO Air Sparge Matt Slobig

<b>System Function</b>	Deep blower Hour	3749			
	Deep blower speed	75%			
	Shallow blower Hour	23419			
	Shallow blower speed	75%			
	Deep Heat Exchanger Hour	47278			
	Shallow Heat exchanger Hour	23422			
<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: 0			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>					
All system is looking good					

# Monthly Inspection Checklist

Date: 3.12.2025

PEO Air Sparge Matt Slobig

<b>System Function</b>	Deep blower Hour	4285			
	Deep blower speed	75			
	Shallow blower Hour	23,955			
	Shallow blower speed	75			
	Deep Heat Exchanger Hour	47,814			
	Shallow Heat exchanger Hour	23,958			
<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			changed out 3 of 4 filters need bigger circular filter and used the last smaller circular filter
	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?				
<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: 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>					
Need to get more of the bigger circular filters\ Did not have a spare					
Need to get more smaller circular filters i used the last one					