

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 10, 2025

Project ID: MMGL-PEO

**Re: Quarter 4, 2024 – Quarterly Progress Report (October through December 2024)
Premier Edible Oils Site (ECSI #2013)**

This memorandum presents the quarterly progress report for the period from October through December 2024 for the Premier Edible Oils (PEO) project site (Site) located at 10400 North Burgard Way in Portland, Oregon (refer to Figure 1). 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 OCTOBER THROUGH DECEMBER 2024

- Scrubbed accumulated sediment from the air sparge well screens from October 28 through October 30, 2024. Loose sediment was pumped from the wells and removed as investigation derived waste from the Site for disposal.
- Replaced absorbent socks in wells that historically or recently exhibited non-aqueous phase liquid on October 28, 2024, and December 3, 2024.
- Performed monthly maintenance of the air sparge system in November and December 2024. Monthly maintenance logs are included in Attachment 1.
- Held a meeting with representatives from ODEQ, U.S. Environmental Protection Agency (USEPA), and the 5 Tribes on October 25, 2024, to discuss the Proposal for Modifications to the Performance Monitoring memorandum.
- Addressed two sets of comments from USEPA and the 5 Tribes on the Proposal for Modifications to the Performance Monitoring memorandum and submitted the final memorandum to ODEQ on December 12, 2024. Received advance approval for the proposed changes on December 3, 2024.
- Conducted the 26th semi-annual performance monitoring event at the Site on December 4, 5, and 10, 2024. The reduced scope of performance monitoring was

implemented per the modifications proposed in the Proposal for Modifications to the Performance Monitoring memorandum, approved via email by ODEQ on December 3, 2024. Groundwater elevations for December 2024 are summarized in Table 1. Groundwater analytical results for this event will be included in the 2024 Annual Performance Monitoring Report.

ACTIVITIES PLANNED JANUARY THROUGH MARCH 2025

- Meet with ODEQ on February 6, 2025, to discuss the ecological risk assessment for the Site.
- Prepare and submit the 2024 Annual Performance Monitoring Report in March 2024.
- Redevelop well MW-11.
- Perform air sparge system optimization activities, as necessary.

SAMPLING, TEST RESULTS, AND OTHER DATA GENERATED OCTOBER THROUGH DECEMBER 2024

- Performed semiannual water level measurements on December 4, 2024 (refer to Table 1).
- Received analytical results collected in December 2024. Data are currently being validated and will be included in the 2024 Annual Performance Monitoring Report.

PROBLEMS EXPERIENCED OCTOBER THROUGH DECEMBER 2024

- None.

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

LIST OF ATTACHMENTS

Table 1 Groundwater Elevations December 2024
Figure 1 Site Plan and Monitoring Well Locations
Attachment 1 November and December Air Sparge Maintenance Logs

Table

Table 1
Groundwater Elevations December 2024

Groundwater Monitoring	Well Depth (ft bgs)	Screened Interval (ft bgs)	Screen Zone	TOC Elevation	Depth to Water December 3, 2024 (ft bgs)	Groundwater Elevation Q4 (December 3, 2024)	Depth to NAPL (ft bgs)	NAPL Thickness (ft)
MW-02	26	11–26	shallow	31.18	20.89	10.29	--	--
MW-03	26	11–26	shallow	31.67	20.13	11.54	--	--
MW-06	27	12–27	shallow	31.23	20.75	10.48	--	--
MW-08	27	12–27	shallow	30.93	21.62	9.31	--	--
MW-11	27	12–27	shallow	31.06	20.20	10.86	-- (1)	--
MW-18	27	12–27	shallow	30.87	20.81	10.06	--	--
MW-19	27	12–27	shallow	31.70	21.52	10.18	--	--
MW-21	27	12–27	shallow	31.36	13.91	17.45	--	--
MW-24A	27	12–27	shallow	34.36	20.49	13.87	--	--
MW-25	27	unknown	shallow	31.78	22.14	9.64	--	--
MW-26	39	34–39	deep	31.89	24.05	7.84	--	--
MW-27	40	35–40	deep	31.46	20.12	11.34	--	--
MW-28A	29	14–29	shallow	31.81	18.40	13.41	--	--
MW-29	30	13–28	shallow	31.90	19.69	12.21	--	--
MW-30	28	13–28	shallow	31.05	21.49	9.56	--	--
MW-31	28	13–28	shallow	30.77	21.08	9.69	--	--
MW-32	40	35–40	deep	31.08	22.10	8.98	--	--
MW-33	40	35–40	deep	30.88	22.35	8.53	--	--
MW-34	28	13–28	shallow	30.72	20.95	9.77	--	--
MW-35	40	35–40	deep	30.83	22.72	8.11	--	--
MW-36	30	25–30	shallow	30.16	19.79	10.37	--	--
MW-37	40	35–40	deep	31.27	23.48	7.79	--	--
MW-38	27	13–27	shallow	31.54	19.72	11.82	-- (2)	--
MW-39	30	25–30	shallow	31.08	22.01	9.07	-- (2)	--
MW-40	40	35–40	deep	33.96	25.70	8.26	--	--
MW-41	27	13–27	shallow	33.80	19.59	14.21	--	--
MW-42	40	35–40	deep	31.94	22.75	9.19	--	--
MW-43	30	15–30	shallow	31.39	22.34	9.05	-- (2)	--
MW-44	25	10–25	shallow	30.98	21.00	9.98	--	--
MW-45	30	15–30	shallow	34.15	21.35	12.8	--	--

Notes:

All elevations were measured in NAVD 88.

1 Trace NAPL observed; absorbent sock installed

2 Trace NAPL observed; absorbent sock changed.

Abbreviations:

bgs Below ground surface

ft Feet

NAPL Non-aqueous phase liquid

NAVD 88 North American Vertical Datum of 1988

TOC Top of casing

Figure



Attachment 1
November and December Air Sparge Maintenance Logs

Monthly Inspection Checklist

Date: 11.1.2024

PEO Air Sparge

System Function	Deep blower Hour				1352
	Deep blower speed				75%
	Shallow blower Hour				21025
	Shallow blower speed				75%
	Deep Heat Exchanger Hour				44881
	Shallow Heat exchanger Hour				21025
Inspection Area	Inspection Item	Y	N	N/A	Comments
Trailer	Trailer Secure?	Y			
	Warning system connected to internet?		N		working on getting this switch to a Telluric account should be set up by 11.6.2024
	Warning system working?		N		
Inspection Area	Inspection Item	Y	N	N/A	Comments
Air Sparge System	Oil change?		N		
	Is shallow zone operating upon arrival?	Y			
	Is deep zone operating upon arrival?	Y			
	Is above ground piping free from damage?	Y			
Inspection Area	Inspection Item	Y	N	N/A	Comments
Air Filters	Air filters change out Deep System	Y			
	Air Filter Change out Shallow System	Y			
	Are gaskets present and in good condition?			N	
Inspection Area	Inspection Item	Y	N	N/A	Comments
General Site	Is site clean of trash and debris?	Y			
	Is there any evidence of construction equipment / vehicles entering exclusion area?		N		
	Is there evidence of leaks / drips / spills?		N		
Inspection Area	Inspection Item	Y	N	N/A	Comments
System Optimization Tasks	Clean Meters		N		
	Air Sparge Wells Cleaning?	Y			
Inspection Area	Inspection Item	Y	N	N/A	Comments
IDW	How many drums onsite?		Purge Water:	9	Product: 1, quarter full
	Are all drums labeled with appropriate non-hazardous waste label?	x			Telluric to dispose in the next couple weeks.
	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:					
Telluric cleaned all Deep and shallow air sparge wells all wells where measured before and after cleaning and we found zero material inside the wells they all measured to the correct depth.					
We removed around 100gl of water from all wells: Started on 10.28.24 finished on 10.31.2024					
Added 1 275 gallon tote to the site					

Monthly Inspection Checklist

Date: 12.12.20204

PEO Air Sparge Matt Slobig

System Function	Deep blower Hour				2,142
	Deep blower speed				75%
	Shallow blower Hour				21,811
	Shallow blower speed				75%
	Deep Heat Exchanger Hour				46,670
	Shallow Heat exchanger Hour				21,814
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		Down Due to well sampling
	Is deep zone operating upon arrival?		X		Down Due to well sampling
	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: 0	Product: 1 55gal barrel
	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 is all back online and work well					