

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 14, 2024

Project ID: MMGL-PEO

**Re: Quarter 3, 2024 – Quarterly Progress Report (July through September 2024)
Premier Edible Oils Site (ECSI #2013)**

This memorandum presents the quarterly progress report for the period from July through September 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 SEPTEMBER THROUGH JULY 2024

- Oversaw replacement of the blower for the deep air sparge system on July 15, 2024. Installation and maintenance on the deep system continued through July 30, after which the system was determined to be fully operational.
- Performed monthly maintenance of the air sparge system in August and September 2024.
- Collected quarterly depth-to-water measurements at all Site wells on September 5, 2024. This is the 73rd synoptic water level event conducted at the Site since installation of the groundwater barrier wall (GWBW). Groundwater elevations for September 2024 are summarized in Table 1. A depth-to-water measurement could not be collected from well MW-11 due to the presence of a hard crust within the well screen.
- Installed absorbent socks in wells that historically or recently exhibited non-aqueous phase liquid (NAPL) on September 5, 2024.
- Submitted the Proposal for Modifications to the Performance Monitoring memorandum to ODEQ on September 30, 2024.

ACTIVITIES PLANNED OCTOBER THROUGH DECEMBER 2024

- Meet with ODEQ, U.S. Environmental Protection Agency, and representatives from the tribes on October 25, 2024, to discuss the proposal to the Performance Monitoring Plan.
- Conduct the second 2024 semiannual groundwater monitoring event and quarterly groundwater level measurements for the fourth quarter before the end of 2024.
- Redevelop well MW-11.
- Perform air sparge system optimization activities, as necessary.
- Begin preparing the 2025 Annual Groundwater Monitoring Report.

SAMPLING, TEST RESULTS, AND OTHER DATA GENERATED APRIL THROUGH SEPTEMBER 2024

- None.

PROBLEMS EXPERIENCED JULY THROUGH SEPTEMBER 2024

- None.

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

LIST OF ATTACHMENTS

Table 1	Groundwater Elevations September 2024
Figure 1	Site Plan and Monitoring Well Locations

Table

Table 1
Groundwater Elevations September 2024

Groundwater Monitoring Well	Well Depth (ft bgs)	Screened Interval (ft bgs)	Screen Zone	TOC Elevation (ft NAVD 88)	Depth to Water September 5, 2024 (ft bgs)	Groundwater Elevation Q2 (September 5, 2024; ft NAVD 88)	Depth to NAPL (ft bgs)	NAPL Thickness (ft)
MW-02	26	11–26	shallow	31.18	22.7	8.48	--	--
MW-03	26	11–26	shallow	31.67	21.37	10.3	--	--
MW-06	27	12–27	shallow	31.23	22.2	9.03	--	--
MW-08	27	12–27	shallow	30.93	22.30	8.63	--	--
MW-11	27	12–27	shallow	31.06	NM ⁽¹⁾	--	--	--
MW-18	27	12–27	shallow	30.87	22.39	8.48	--	--
MW-19	27	12–27	shallow	31.70	23.04	8.66	--	--
MW-21	27	12–27	shallow	31.36	14.58	16.78	--	--
MW-24A	27	12–27	shallow	34.36	21.12	13.24	--	--
MW-25	27	unknown	shallow	31.78	22.98	8.8	--	--
MW-26	39	34–39	deep	31.89	23.34	8.55	--	--
MW-27	40	35–40	deep	31.46	22.94	8.52	--	--
MW-28A	29	14–29	shallow	31.81	18.34	13.47	--	--
MW-29	30	13–28	shallow	31.90	20.32	11.58	--	--
MW-30	28	13–28	shallow	31.05	22.48	8.57	--	--
MW-31	28	13–28	shallow	30.77	22.32	8.45	--	--
MW-32	40	35–40	deep	31.08	23.19	7.89	--	--
MW-33	40	35–40	deep	30.88	22.62	8.26	--	--
MW-34	28	13–28	shallow	30.72	22.23	8.49	--	--
MW-35	40	35–40	deep	30.83	22.24	8.59	--	--
MW-36	30	25–30	shallow	30.16	21.74	8.42	--	--
MW-37	40	35–40	deep	31.27	22.79	8.48	--	--
MW-38	27	13–27	shallow	31.54	21.19	10.35	--	--
MW-39	30	25–30	shallow	31.08	22.10	8.98	--	--
MW-40	40	35–40	deep	33.96	25.70	8.26	--	--
MW-41	27	13–27	shallow	33.80	20.12	13.68	--	--
MW-42	40	35–40	deep	31.94	23.65	8.29	--	--
MW-43	30	15–30	shallow	31.39	23.20	8.19	23.17	0.03
MW-44	25	10–25	shallow	30.98	22.40	8.58	--	--
MW-45	30	15–30	shallow	34.15	25.82	8.33	--	--

Note:

1 A measurement could not be collected from MW-11 due to the presence of a hard crust within the well screen.

Abbreviations:

- bgs Below ground surface
- ft Feet
- NAPL Non-aqueous phase liquid
- NAVD 88 North American Vertical Datum of 1988
- NM Not measured
- PVC Polyvinyl chloride
- TOC Top of casing

Figure

