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Memorandum

To: Erin McDonnell, Jim Orr, and David Lacey, Oregon Department of Environmental Quality

Copies: Mat Cusma, Schnitzer Steel Industries, Inc.

From: Amanda McKay, Floyd|Snider

Date: January 13, 2023

Project No: SSI-BIP DEQ

Re: **Burgard Industrial Park Project Status Report—Fourth Quarter 2022**

This memorandum presents the project status report for the period October through December 2022 for the Burgard Industrial Park (BIP) Source Control project in Portland, Oregon. This status report is prepared in accordance with the June 16, 2000, Voluntary Agreement (WMCVC-NWR-0015) between Schnitzer Steel Industries, Inc., and the Oregon Department of Environmental Quality (ODEQ).

WORK COMPLETED OCTOBER THROUGH DECEMBER 2022

- Removed transducers from monitoring wells and downloaded transducer data from monitoring wells collected between May and October 2022, completing 1 year of transducer data collection.
- Attended monthly meetings with ODEQ and U.S. Environmental Protection Agency (USEPA) on October 3 and December 5, 2022, to discuss source control status.
- Conducted the fourth round of groundwater monitoring at the BIP from October 3 to 7, 2022.
- Submitted project status report to ODEQ on October 4, 2022.
- Collected a discharge sample from presumed Outfall 19 on October 13, 2022.
- Updated the submittal date of the Groundwater Investigation Report and Work Plan Addendum to January 2023, which was approved by USEPA and ODEQ on October 25, 2022.
- Placed stormwater solids samplers in discharge points for Basins 18, 21, and 23 on November 8, 2022.
- Submitted the revised Air Deposition Study Work Plan on December 12, 2022.
- Completed construction of the Tract A stormwater source control measures project in December 2022.
- Developed Tract A Operations and Maintenance Plan.

- Ongoing coordination with the City of Portland Bureau of Development Services for requests regarding permitting for the wheel wash at the Schnitzer Scale and Northwest Pipe Access Road gate.

ACTIVITIES PLANNED JANUARY THROUGH MARCH 2023

- Submit project status report to ODEQ.
- Ongoing attendance of monthly status meetings with ODEQ and USEPA.
- Submit the Tract A Operations and Maintenance Plan in January 2023.
- Submit Groundwater Investigation Report and Work Plan Addendum in January 2023.
- Submit the Stormwater Source Control Measures and Evaluation Data Report in March 2023, assuming receipt of all validated data.
- Revise the Air Deposition Study Work Plan based on ODEQ and USEPA response to comments.
- Complete the third round of flow observations at Lot 7/8 to determine efficacy of flow-through planter.
- Commence construction of the wheel wash at the Schnitzer Scale and Northwest Pipe Access Road gate, assuming receipt of City of Portland permits.
- Perform stormwater grab and composite sampling per the Stormwater Outfall Monitoring Work Plan approved by USEPA on June 30, 2022.

SAMPLING, TEST RESULTS, AND OTHER DATA GENERATED OCTOBER THROUGH DECEMBER 2022

Received the following datasets:

- Groundwater results from the third and fourth monitoring event were received and are currently in validation stages. Seep data collected during the fourth monitoring event have also been received and are pending validation.
- Data for the March 2022 Basin 18 surface soil sampling event are currently being validated by EcoChem.
- Data for the 2022 stormwater sampling events proposed in the Stormwater Source Control Measures and Evaluation Work Plan are currently being validated by EcoChem.

Sampling, test results, and other data generated will be submitted to ODEQ in other project deliverables.

PROBLEMS EXPERIENCED OCTOBER THROUGH DECEMBER 2022

PCB congeners analysis continue to be delayed with turnaround times up to 6 months. Additionally, validation of the data packages continue to be lengthy (as long as 2 to 3 months), requiring significant coordination between the laboratory and data validator.

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

Sincerely,
FLOYD | SNIDER

Amanda McKay
Senior Scientist