

# Memorandum

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

**Copies:** Mat Cusma, Radius Recycling

**From:** Sabine Datum, Floyd|Snider

**Date:** January 15, 2026

**Project No:** SSI-BIP DEQ

**Re: Burgard Industrial Park Project Status Report—Fourth Quarter 2025**

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This memorandum presents the project status report for the period October through December 2025 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 2025**

- Submitted the Q3 2025 project status report to ODEQ on October 13.
- Performed Q4 quarterly maintenance inspection at Tract A on October 27. The maintenance log for this visit is attached.
- Continued implementation of the Wheel Wash Effectiveness Monitoring Plan.
- Addressed U.S. Environmental Protection Agency (USEPA) comments on the River Mile 3.5 East Stormwater Outfall Monitoring Data Report and resubmitted to USEPA on December 30.
- Submitted the 2025 Tract A Stormwater Data Report to ODEQ on December 30.

## **ACTIVITIES PLANNED JANUARY THROUGH MARCH 2026**

- Continue implementation of the Wheel Wash Effectiveness Monitoring Plan and submit the semiannual Wheel Wash Monitoring Report for the second half of 2025.
- Receive ODEQ comments on the 2025 Tract A Stormwater Data Report.
- Receive ODEQ comments on the May 2023 Stormwater Source Control Measures and Evaluation Data Report.
- Continue Tract A quarterly maintenance inspections.

**SAMPLING, TEST RESULTS, AND OTHER DATA GENERATED OCTOBER THROUGH DECEMBER 2025**

- Completed June 2025 Tract A stormwater in-house and external data validation.

**PROBLEMS EXPERIENCED OCTOBER THROUGH DECEMBER 2025**

- None.

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

Sincerely,  
FLOYD | SNIDER



Sabine Datum, RG  
Senior Geologist

Encl.: Q4 2025 Tract A Maintenance Log

Tract A O&M Log

Date of Check: 10/27/2025  
 Quarter and Year: 4th Qtr 2025  
 Performed By: J. Pounds  
 Reviewed By: \_\_\_\_\_

Defect	Frequency of Inspection	Observed Y/N	Type of Maintenance Work Performed				Notes	Initials
			Clean Inlets and Outlets	Sediment and Trash Removal	Structural Repairs (type, location)	Other		
<b>Biotreatment Systems</b>								
Trash or debris blocking inlets more than 1/3 of inlet height or blocking flow through system	Quarterly (within 48 hrs of a rain event > 1" in 24 hrs)	No					Planter Inlets look good. Rock placed around	JP
Any evidence of oil, gasoline, or other pollutants in the system	Quarterly	No					Inlets	JP
Sediment accumulation greater than 4 inches or 30% of total capacity as designed or measured	Quarterly	No					—	JP
Signs of reduced infiltration such as ponding lasting longer than 30 hours after a storm event, or a high water mark at the elevation of overflow piping not related to a significant storm event.	Quarterly (within 48 hrs of a rain event > 1" in 24 hrs)	No					Infiltration looks good. grass starting to grow	JP
Structure damage to inlet that impedes efficient and even distribution of water.	Quarterly (within 48 hrs of a rain event > 1" in 24 hrs)	No					No	JP
Signs of pests such as mosquitos or rodents.	Quarterly	No					No	JP

Outside @ 9:30 AM  
Rain,

Date of Check: 10/27/2025  
 Quarter and Year: 4th Quarter 2025  
 Performed By: J. Pounds  
 Reviewed By: \_\_\_\_\_

Tract A O&M Log

Defect	Frequency of Inspection	Observed Y/N	Type of Maintenance Work Performed				Notes	Initials
			Clean Inlets and Outlets	Sediment and Trash Removal	Structural Repairs (type, location)	Other		
<b>Catch Basins</b>								
Trash or debris in any inlet or outlet pipe blocking more than one-third of inlet height, or exceeding 60% of sump depth as measured from the bottom of basin to invert of lowest pipe.	Quarterly	No	-				looks good	JP
Trash or debris in grate blocking more than 20% of inletting capacity.	Quarterly	No	-				CB's look good No trash/debris	JP
Any evidence of oil, gasoline, or other pollutants in the system.	Quarterly	No					No sheen observed	JP
Sediment accumulation exceeding 60% of sump depth as measured from the bottom of basin to invert of lowest pipe or within 6 inches of the lowest pipe invert.	Quarterly	No					Just cleaned	JP
Structure damage to the frame or top slab that would allow material to run into the basin or create a safety hazard.	Quarterly	No						JP

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Tract A O&M Log

Defect	Frequency of inspection	Observed Y/N	Type of Maintenance Work Performed				Notes	Initials
			Clean Inlets and Outlets	Sediment and Trash Removal	Structural Repairs (type, location)	Other		
<b>Outfalls 20/20A</b>								
Visual inspection of Outfalls 20 and 20A to confirm that Tract A stormwater conveyance has been successfully abandoned.	Quarterly, during acceptable target storm conditions <sup>1, 2</sup>	No					No surface water discharge observed	JP

Note:

- 1 Storms predicted to produce more than 0.2 inches of rainfall within a minimum of a 3 hour period and are preceded by at least a 24-hour dry period with less than 0.1 inches of rainfall
- 2 Two inspections total to be performed