

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: October 13, 2025

Project No: SSI-BIP DEQ

Re: Burgard Industrial Park Project Status Report—Third Quarter 2025

This memorandum presents the project status report for the period July through September 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 JULY THROUGH SEPTEMBER 2025

- Submitted the Air Deposition Study Data Report to the U.S. Environmental Protection Agency (USEPA) on July 7.
- Submitted the Q2 2025 project status report to ODEQ on July 14.
- Submitted the second semiannual Wheel Wash Monitoring Report for 2025 on July 3, followed by a revised report on August 13.
- Performed maintenance work on Tract A biotreatment stormwater planters on August 20 in response to monthly maintenance observations in Q2 that indicated reduced infiltration due to sediment accumulation. Work included excavation of 2 to 4 inches of accumulated sediment from each planter. An approximately 1-foot-wide strip of grass was left along the length of each planter to promote propagation.
- Continued implementation of the Wheel Wash Effectiveness Monitoring Plan.
- Received USEPA comments on the River Mile 3.5 East Stormwater Outfall Monitoring Data Report on September 12.

ACTIVITIES PLANNED OCTOBER THROUGH DECEMBER 2025

- Continue implementation of the Wheel Wash Effectiveness Monitoring Plan.
- Receive ODEQ comments on the Stormwater Source Control Measures and Evaluation Data Report and the River Mile 3.5 East Stormwater Outfall Monitoring Data Report.
- Finalize Tract A data validation and database loading and begin drafting the Tract A stormwater system performance monitoring report for the second year of monitoring.
- Continue Tract A quarterly maintenance inspections.

SAMPLING, TEST RESULTS, AND OTHER DATA GENERATED JULY THROUGH SEPTEMBER 2025

- Received the Tract A March 2025 stormwater sample results. In-house and external data validation and database loading are complete.
- Received the Tract A May 2025 stormwater sample results. In-house and external data validation and database loading are complete.
- Received the Tract A June 2025 stormwater sample results. In-house and external data validation is in progress.

Sampling, test results, and data generated in accordance with the Tract A performance monitoring will be submitted to ODEQ as part of the second year monitoring report.

PROBLEMS EXPERIENCED JULY THROUGH SEPTEMBER 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