

Memorandum

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

Copies: Mat Cusma, Radius Recycling

From: Amanda McKay, Floyd|Snider

Date: April 10, 2025

Project No: SSI-BIP DEQ

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

This memorandum presents the project status report for the period January through March 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 JANUARY THROUGH MARCH 2025

- Submitted project status report to ODEQ on January 8, 2025.
- Continued implementation of the Wheel Wash Effectiveness Monitoring Plan and submitted first semiannual Wheel Wash Monitoring Status Report to ODEQ on January 15, 2025.
- Performed the second quarterly Tract A quarterly inspection on March 13, 2025.
- Collected a Tract A stormwater sample on March 13, 2025, as part of Tract A stormwater system performance monitoring per the Tract A Operations and Maintenance Plan.
- Continued drafting the Air Deposition Study Data Report.
- Continued drafting the Stormwater Outfall Monitoring Data Report.
- Presented preliminary stormwater and storm solids loading calculations in the quarterly meeting with U.S. Environmental Protection Agency and ODEQ on February 5, 2025.

ACTIVITIES PLANNED APRIL THROUGH JUNE 2025

- Submit project status report to ODEQ.
- Continue implementation of the Wheel Wash Effectiveness Monitoring Plan.

- Submit the Air Deposition Study Data Report.
- Submit the Stormwater Outfall Monitoring Data Report.
- Receive ODEQ comments on the Stormwater Source Control Measures and Evaluation Data Report.
- Continue Tract A stormwater system performance monitoring per the Tract A Operations and Maintenance Plan.

SAMPLING, TEST RESULTS, AND OTHER DATA GENERATED JANUARY THROUGH MARCH 2025

- Completed in-house and external validation of the August to September air deposition sampling analytical data. Data are loaded to the internal database.
- Completed loading of the May/June 2024 air deposition sampling data to the internal database.
- Completed loading of the June 2024 MW-118 hot spot delineation soil data to the internal database.
- Received the Tract A November 2024 stormwater sample results. In-house and external validation is complete. Loading to the internal database 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 subsequent project deliverables.

PROBLEMS EXPERIENCED JANUARY THROUGH MARCH 2025

No problems were experienced in this reporting period.

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

Sincerely,

FLOYD | SNIDER



Amanda McKay, M.S.
Associate Principal