

Memorandum

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

Copies: Mat Cusma, Radius Recycling

From: Allison Geiselbrecht, Floyd|Snider

Date: January 8, 2025

Project No: SSI-BIP DEQ

Re: Burgard Industrial Park Project Status Report—Fourth Quarter 2024

This memorandum presents the project status report for the period October through December 2024 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 2024

- Continued implementation of the Wheel Wash Effectiveness Monitoring Plan.
- Submitted project status report to ODEQ on October 7, 2024.
- Performed the Tract A quarterly inspection on November 11, 2024.
- Collected Tract A stormwater samples on November 11, 2024, as part of Tract A stormwater system performance monitoring per the Tract A Operations and Maintenance Plan.
- Began drafting the Air Deposition Study Data Report.

ACTIVITIES PLANNED JANUARY THROUGH MARCH 2025

- Submit project status report to ODEQ.
- Continue implementation of the Wheel Wash Effectiveness Monitoring Plan and submit the first semiannual wheel wash monitoring status report to ODEQ.
- Continue drafting the Air Deposition Study Data Report.
- Continue drafting 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 OCTOBER THROUGH DECEMBER 2024

- Received the August to September air deposition sampling analytical data in October and November 2024. In-house and external validation for these data is in progress.
- Completed partial loading of the May/June 2024 air deposition sampling data to the internal database. External validation is in progress.
- June 2024 MW-118 hot spot delineation soil data have been received and are undergoing in-house validation. External validation is complete.
- Received the Tract A November 2024 stormwater sample results.

Sampling, test results, and data generated in accordance with the Stormwater Outfall Monitoring Plan, Groundwater Investigation Report and Work Plan Addendum, and Air Deposition Study Work Plan will be submitted to the U.S. Environmental Protection Agency and ODEQ as part of subsequent project deliverables.

PROBLEMS EXPERIENCED OCTOBER THROUGH DECEMBER 2024

None.

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

Sincerely,
FLOYD | SNIDER



Allison Geiselbrecht, Ph.D.
Principal