

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: October 7, 2024

Project No: SSI-BIP DEQ

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

This memorandum presents the project status report for the period July through September 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 JULY THROUGH SEPTEMBER 2024

- Began implementation of the Wheel Wash Effectiveness Monitoring Plan on July 1, 2024.
- Submitted project status report to ODEQ on July 10, 2024.
- Performed the Tract A quarterly inspection on July 19, 2024.
- Submitted the Tract A Stormwater Data Report on July 25, 2024.
- Collected air samples in accordance with the Air Deposition Study Work Plan on September 10, 2024.

ACTIVITIES PLANNED OCTOBER THROUGH DECEMBER 2024

- Submit project status report to ODEQ.
- Continue implementation the Wheel Wash Effectiveness Monitoring Plan and submit status update on the project to ODEQ.
- Commence drafting the Air Deposition Study 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 JULY THROUGH SEPTEMBER 2024

- Received all validated Tract A stormwater data in July 2024.
- Completed in-house validation for the May/June 2024 air deposition sampling. External validation for the May/June 2024 air deposition sampling and laboratory analysis for the September air deposition sampling is in progress.
- Received external validation results for March 2024 stormwater solids data.
- Received external data validation for the April 2024 groundwater sampling.

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 USEPA and ODEQ in other project deliverables.

PROBLEMS EXPERIENCED JULY THROUGH SEPTEMBER 2024

Significant concerns from truck drivers have been received since the implementation of the Wheel Wash Effectiveness Monitoring Plan on July 1, 2024. To address these concerns, several modifications to the approach and exit ramps had to be made. The modifications will be addressed in a forthcoming project status update, and the first semi-annual wheel wash monitoring report will be submitted in January 2025.

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

Sincerely,

FLOYD | SNIDER



Amanda McKay
Senior Scientist