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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: July 10, 2024

Project No: SSI-BIP DEQ

Re: **Burgard Industrial Park Project Status Report—Second Quarter 2024**

This memorandum presents the project status report for the period April through June 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 APRIL THROUGH JUNE 2024

- Submitted project status report to ODEQ on April 9, 2024.
- Collected air samples in accordance with the Air Deposition Study Work Plan on June 28, 2024.
- Collected groundwater samples between April 15 and April 17, 2024, in accordance with the Groundwater Investigation Report and Work Plan Addendum.
- Advanced six direct-push borings on the Schnitzer Steel Metals Recycling Yard (SSMRY) on June 13th and 14th and collected soil samples in accordance with the memorandum *Soil Sampling Results near MW-118 and Proposed Additional Borings*, dated March 21, 2024.
- Installed 20 passive soil gas samplers in the northern portion of the SSMRY on June 6th and 7th and removed them on June 12th. This work was performed in accordance with the memorandum *Re: Passive Soil Gas Sampling Study – First Phase Results and Proposed Second Phase* dated March 25, 2024.
- Finalized the wheel wash system installation and prepared for implementation of the Wheel Wash Effectiveness Monitoring Plan.

ACTIVITIES PLANNED JULY THROUGH SEPTEMBER 2024

- Submit project status report to ODEQ.
- Implement the Wheel Wash Effectiveness Monitoring Plan.

- Continue air deposition sampling in accordance with the Air Deposition Study Work Plan.
- Receive ODEQ comments on the Stormwater Source Control Measures and Evaluation Data Report.
- Finalize the Tract A Stormwater Data report summarizing performance monitoring sample data collected from the Tract A area between December 2023 and February 2024. Submittal to ODEQ is planned for July 2024.

SAMPLING, TEST RESULTS, AND OTHER DATA GENERATED APRIL THROUGH JUNE 2024

- Completed in-house validation for February 2024 Tract A stormwater data. Received validated dioxin/furan and polychlorinated biphenyl (PCB) congeners data from the external validator for January and February 2024 Tract A stormwater data.
- Received external validation results for November 2023 air deposition sampling. Completed in-house validation and received external validation results for the February 2024 air deposition sampling. Laboratory analysis for the May/June 2024 air deposition sampling is in progress.
- Received external validation results for January 2024 stormwater sampling. Completed in-house validation of March 2024 stormwater solids data. External validation for this event is in progress.
- Received April 2024 groundwater data from the analytical laboratory. In-house data validation is complete. External data validation of PCB congener and dioxin/furan data from this sampling event is in progress.

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 JANUARY THROUGH MARCH 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 quarterly monitoring report, upon completion of a full quarter of wheel wash monitoring.

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

Sincerely,
FLOYD | SNIDER

Amanda McKay
Senior Scientist