

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: January 8, 2023

Project No: SSI-BIP DEQ

Re: Burgard Industrial Park Project Status Report—Fourth Quarter 2023

This memorandum presents the project status report for the period October through December 2023 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 2023

- Provided follow-up information to the Five Tribes via ODEQ regarding the Tract A treatment technology on October 4, 2023.
- Received ODEQ approval of the Tract A Operations and Maintenance Plan on October 9, 2023.
- Continued implementation of the Groundwater Investigation Report and Work Plan Addendum on October 9, 2023, including retrieval of passive samplers for analysis.
- Submitted project status report to ODEQ on October 12, 2023.
- Collected air samples in accordance with the Air Deposition Study Work Plan on October 25, 2023.
- Updated the Wheel Wash Effectiveness Monitoring Plan to incorporate comments from the Five Tribes per ODEQ request on October 27, 2023.
- Collected first Tract A performance monitoring sample on December 5, 2023.
- Attended monthly meeting with ODEQ and USEPA on December 6, 2023, and provided summary meeting notes on December 18, 2023.

- Continued implementation of the Flow Monitoring Work Plan and Stormwater Outfall Monitoring Plan. The flow meter locations were reconfigured in December 2023 to address ongoing issues with the composite samplers.

ACTIVITIES PLANNED JANUARY THROUGH MARCH 2024

- Submit project status report to ODEQ.
- Continue implementation of the Wheel Wash Effectiveness Monitoring Plan.
- Continue implementation of the Tract A Operations and Maintenance Plan.
- Continue air deposition sampling in accordance with the Air Deposition Study Work Plan in August 2023.
- Continue stormwater grab and composite sampling per the Stormwater Outfall Monitoring Work Plan approved by the U.S. Environmental Protection Agency (USEPA) on June 30, 2022.
- Receive ODEQ comments on the Stormwater Source Control Measures and Evaluation Data Report.
- Continue implementation of the Groundwater Investigation Report and Work Plan Addendum on October 9, 2023, specifically annual groundwater monitoring.
- Receive Tract A performance monitoring sample data and begin data validation.
- Receive air deposition sample results from October sampling event and begin data validation.
- Present results from soil sampling and passive sampler pilot testing, implemented as part of the Groundwater Investigation Report and Work Plan Addendum.

SAMPLING, TEST RESULTS, AND OTHER DATA GENERATED OCTOBER THROUGH DECEMBER 2023

- Collected and received October 2023 stormwater event dataset.
- Completed in-house validation (includes all data except dioxins/furans and PCB congeners) for June, July, August, and October 2023 stormwater events.
- Received validated dioxins/furans and PCB congener stormwater datasets from the third-party validator for March, June, July, and August 2023 stormwater events. The October 2023 dataset is undergoing validation.
- Collected and received partial 2023 air deposition datasets and weather data.
- Received and validated September 2023 soil dataset from the MW-118 hot spot delineation.

Sampling, test results, and other stormwater 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. When available, Tract A performance monitoring data will be submitted with the quarterly Project Status Report.

PROBLEMS EXPERIENCED OCTOBER THROUGH DEECMBER 2023

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
Senior Scientist