

Memorandum

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

Copies: Mat Cusma, Schnitzer Steel Industries, Inc.

From: Amanda McKay, Floyd|Snider

Date: October 12, 2023

Project No: SSI-BIP DEQ

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

This memorandum presents the project status report for the period July through September 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 JULY THROUGH SEPTEMBER 2023

- Submitted project status report to ODEQ on July 10, 2023.
- Completed construction of the wheel wash at the Schnitzer Scale Access Road gate on September 12, 2023.
- Received ODEQ comments on the Tract A Operations and Maintenance Plan on September 15, 2023.
- Received ODEQ approval of the Wheel Wash Effectiveness Monitoring Plan on September 19, 2023. The activities to occur after implementation of the Wheel Wash Effectiveness Monitoring Plan are in discussion.
- Provided stormwater dioxin/furan dataset to ODEQ on September 26, 2023.
- Commenced implementation of the Groundwater Investigation Report and Work Plan Addendum on September 27 and 28, 2023, including hot spot investigation near groundwater well MW-118 and deployment of passive samplers.
- Deployed air samplers in accordance with the Air Deposition Study Work Plan on September 29, 2023.

- Continued implementation of the Flow Monitoring Work Plan and Stormwater Outfall Monitoring Plan.

ACTIVITIES PLANNED OCTOBER THROUGH DECEMBER 2023

- Submit project status report to ODEQ.
- Complete startup activities and commence implementation of the Wheel Wash Effectiveness Monitoring Plan and Tract A Operations and Maintenance Plan.
- Retrieve passive samplers for analysis in accordance with the Groundwater Investigation Report and Work Plan Addendum.
- Continue air deposition sampling in accordance with the Air Deposition Study Work Plan in August 2023.
- Perform 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.

SAMPLING, TEST RESULTS, AND OTHER DATA GENERATED JULY THROUGH SEPTEMBER 2023

Received the following validated datasets:

- Stormwater data from the April 2023 monitoring event

Stormwater data from the June and July 2023 monitoring events has been partially received, with dioxins/furans and PCB congeners outstanding.

Sampling, test results, and other stormwater data generated in accordance with the Stormwater Outfall Monitoring Plan will be submitted to USEPA and ODEQ in other project deliverables.

PROBLEMS EXPERIENCED JULY THROUGH SEPTEMBER 2023

First-flush stormwater grab samples were not collected because the storm commenced in the middle of the night on a weekend. A programming error occurred on the composite samplers that additionally prevented collection of composite samples during this storm.

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

Sincerely,

FLOYD | SNIDER



Amanda McKay
Senior Scientist