

January 26, 2026

Via Electronic Mail

Mr. Ray Hoy
Oregon Department of Environmental Quality – Northwest Region
700 NE Multnomah St., Suite 600
Portland, OR 97232

**SUBJECT: FOURTH QUARTER 2025 PROGRESS REPORT
 (October through December 2025)
 Vigor Industrial LLC**

Dear Mr. Hoy:

Floyd|Snider is submitting this Quarterly Progress Report (QPR) on behalf of Vigor Industrial LLC (Vigor) to summarize stormwater source control activities performed during the fourth quarter of 2025 at the Vigor facility located at 5555 N. Channel Avenue in Portland, Oregon. This report also summarizes National Pollutant Discharge Elimination System (NPDES) 1200-Z Permit compliance activities conducted during the second quarter (October through December) of the 2024/2025 monitoring year.

Paragraph 7(H) of the Order on Consent between the Oregon Department of Environmental Quality (ODEQ) and Vigor (ODEQ No. OPV-NWR-16-05), dated December 19, 2016 (Consent Order), requires submittal of QPRs. The following progress report summarizes activities for the fourth quarter of 2025 (October 1 through December 31, 2025).

ACTIONS TAKEN DURING THE FOURTH QUARTER OF 2025

Consent Order Requirements

- On November 3, 2025, Vigor attended a meeting with ODEQ to discuss the Post-Contingency Source Control Measures Stormwater Data Report that was submitted on August 29, 2025.
- On November 7, 2025, Vigor transmitted a corrected version of a report table associated with the Post-Contingency Source Control Measures Stormwater Data Report, and transmitted an updated copy of the Consent Order Source Control Measures tracking table to ODEQ.
- In December, catch basins in Basin R were sampled individually to further evaluate the source of elevated copper concentrations in this basin.
- Vigor began revising the Recontamination Evaluation Work Plan to reflect work completed under the Consent Order between 2018 and 2024.

National Pollutant Discharge Elimination System Permit Requirements

- In October, catch basin media were replaced as needed according to the schedule in the Stormwater Pollution Control Plan (SWPCP) Operations and Maintenance Plan and inspection results in Basins M and O.
- On November 15, 2025, Vigor submitted its Discharge Monitoring Report (DMR) for the first quarter (July to September 2025) of the 2025/2026 monitoring year in accordance with the NPDES 1200-Z Permit.
- On November 20, 2025, stormwater lines in Group R were jetted as a Tier 1 Corrective Action in response to copper and zinc benchmark exceedances in a sample collected on November 5, 2025.
- On November 30, 2025, Vigor updated its SWPCP to reflect current sampling locations at the facility.
- In November, Vigor installed treatment media and an ERTEC Environmental Systems (ERTEC) mat to protect catch basin from associated construction dust and runoff in Basin R1.
- In December, treatment media layers were adjusted by placing smaller media bags on top to limit overflow and bypass of the treatment inserts in Pier D as a Tier 1 Corrective Action in response to copper benchmark exceedance in a sample collected on November 6, 2025.
- On December 4, 2025, the scupper insert seals along Pier C were resealed as a Tier 1 Corrective Action in response to copper benchmark exceedance in a sample collected on November 6, 2025. Additionally, coconut mats were added to the Pier C scuppers in response to copper benchmark exceedance in a sample collected on December 8, 2025.
- In December, fabric filters and ERTEC mats were modified in high traffic areas within Basin M as a Tier 1 Corrective Action in response to copper benchmark exceedances in samples collected on November 25, 2025, and December 18, 2025, respectively.
- On December 12, 2025, a plexiglass catch basin modification was installed to create a faux weir wall in the effluent pipe to increase the catch basin sump depth at the Basin T sample point as a Tier 1 Corrective Action in response to copper and zinc benchmark exceedances in a sample collected on November 25, 2025.
- Vigor continued Year 5 Monitoring in accordance with the NPDES 1200-Z Permit.
- Vigor completed the installation of a telemetry system for the Electrocoagulation (EC) System, which provides flow rate data and alerts for each lift station, and routes stormwater to the EC System.

ACTIONS SCHEDULED FOR THE FIRST QUARTER OF 2026

- Vigor will submit the DMR for the second quarter (October to December 2025) of the NPDES 1200-Z Permit by February 15, 2026.
- Vigor will conduct stormwater sampling during the third quarter (January to March 2026) of the 2025/2026 monitoring year per the NPDES 1200-Z Permit.
- Vigor anticipates meeting with ODEQ to discuss the revised Recontamination Evaluation Work Plan.

SUMMARY OF DATA COLLECTED AND ACTIONS TAKEN

- Stormwater grab samples were collected during storm events in November and December. Two samples each were collected to represent discharge from Group M, Basin Q, Basin R, Group P, Pier D (PD29), Pier C, Group N6, Basin R1, and Basin T. Analytical results are shown in Table 1.
- Vigor has completed the Consent Order collection of four representative EC System performance monitoring samples after Phase 1 and Phase 2 of construction were completed in December 2024. Vigor continues to collect and report performance monitoring samples at the EC System for internal tracking purposes. Stormwater performance monitoring samples were collected from the EC System in Group Q during the fourth quarter of 2025. Analytical results and removal efficiency data are shown in Table 2.
- Influent samples were collected at CB-200, CB-201, CB-202, and CB-203 in Basin R as a source-tracing effort to better understand potential causes for elevated results in Basin R because it appears that the roof is not a source of copper. Analytical results for these additional samples are shown in Table 3.

Sincerely,

FLOYD | SNIDER



Emily Jones, PE
Associate Principal, Director of Quality

Encl. Table 1 Stormwater Grab Sample Analytical Data
Table 2 Stormwater Performance Monitoring Sample Analytical Data
Table 3 Building 72 Source Tracing Influent Sample Analytical Data

Copies: Harrison Holzgang, Vigor Industrial LLC
Alan Sprott, Vigor Industrial LLC
David Lacey, Oregon Department of Environmental Quality
Laura Hanna, USEPA Region X
Angelica Greene, City of Portland Bureau of Environmental Services

Tables

Table 1
Stormwater Grab Sample Analytical Data

Location Name				Group M		Outfall R		Group P		Group Q		Pier D (PD29)		
Sample Name				M(001)-112525	M(001)-121825	R(004)-110525	R(004)-120825	P(005)-110625	P(005)-120825	EC(007)-110625-Eff	Q(007)-121925-Eff	PD-29(008)-110625	PD-29(008)-120825	
Sample Date				11/25/2025	12/18/2025	11/5/2025	12/8/2025	11/6/2025	12/8/2025	11/6/2025	12/19/2025	11/6/2025	12/8/2025	
Analyte ⁽¹⁾	CAS No.	Consent Order Screening Criteria ⁽²⁾	2021 to 2025 1200-Z Permit Benchmarks/Impairment Reference Concentrations ⁽³⁾	Unit										
Conventionals														
pH	pH	--	5.50–9.00	S.U.	6.97	7.76	7.02	7.55	7.31	7.64	6.70	6.23	7.52	7.46
Nitrate + Nitrite (as Nitrogen)	--	--	10.0	mg/L	0.0840	0.0310	0.186	0.0570	0.125	0.0720	0.133	0.0510	0.0560	0.0220
Total Suspended Solids	TSS	--	30.0	mg/L	2.00 J	9.00 J	30.0	17.0	<10.0	2.00 J	<10.0	5.00 J	<10.0	7.00 J
Total Metals														
Aluminum	7429-90-5	87.0	1,100	µg/L	182	90.7	289	808	172	115	839	441	99.0	73.8
Copper	7440-50-8	2.70	15.0	µg/L	17.7	21.2	133	362	14.1	12.3	5.46	4.62	23.9	12.1
Iron	7439-89-6	--	10,000	µg/L	201	233	667	1,990	159	164	569	439	100	76.9
Lead	7439-92-1	0.540	240	µg/L	0.887	1.13	1.39	3.82	0.308	0.554	<1.00 ⁽⁴⁾	0.101	0.695	0.277
Zinc	7440-66-6	36.0	240	µg/L	114 J	101	353	291	37.6	26.6	19.2	19.4	53.1	41.5

Notes:

-- Not applicable.

Italics Non-detect exceedance of the screening criteria.

RED BOLD Detected exceedance of the screening criterion.

RED BOLD Detected exceedance of both the screening criterion and the benchmark.

1 Parameters listed are those specified in the Consent Order for requiring source control.

2 Screening Criteria of CULs presented in Table 17 of the 2017 USEPA Portland Harbor Record of Decision or screening level values from Table 3-1 of ODEQ's 2005 Joint Source Control Strategy where a CUL does not exist.

3 Benchmarks and Impairment Pollutant Reference Concentrations as presented in Vigor's 2021–2025 National Pollutant Discharge Elimination System 1200-Z General Industrial Stormwater Permit No. 70596.

4 Laboratory noted that the reporting limit was raised due to matrix interference.

Abbreviations:

CAS Chemical Abstracts Service

CUL Cleanup level

µg/L Micrograms per liter

mg/L Milligrams per liter

ODEQ Oregon Department of Environmental Quality

S.U. Standard Units

USEPA U.S. Environmental Protection Agency

Qualifier:

< Analyte was not detected at the given method detection limit.

J Concentration is an estimate.

Table 1
Stormwater Grab Sample Analytical Data

Location Name					Pier C		N6		Basin R1		Basin T	
Sample Name					PierC(009)- 110625	PIERC(009)- 120825	N6(011)- 112525	N6(011)- 121825	R1(012)- 110525	R1(012)- 120825	T(014)- 112525	T(014)- 121825
Sample Date					11/6/2025	12/8/2025	11/25/2025	12/18/2025	11/5/2025	12/8/2025	11/25/2025	12/18/2025
Analyte ⁽¹⁾	CAS No.	Consent Order Screening Criteria ⁽²⁾	2021 to 2025 1200-Z Permit Benchmarks/Impairment Reference Concentrations ⁽³⁾	Unit								
Conventionals												
pH	pH	--	5.50–9.00	S.U.	8.12	7.60	7.23	6.73	7.12	7.48	7.15	6.89
Nitrate + Nitrite (as Nitrogen)	--	--	10.0	mg/L	0.0280	0.00900 J	0.232	0.0190	0.164	0.148	0.0660	0.0420
Total Suspended Solids	TSS	--	30.0	mg/L	4.00 J	6.00 J	6.00 J	8.00 J	<10.0	<10.0	7.00 J	<10.0
Total Metals												
Aluminum	7429-90-5	87.0	1,100	µg/L	345	65.2	156	164	25.4	26.1	220	613
Copper	7440-50-8	2.70	15.0	µg/L	44.9	18.5	12.5	18.3	92.0	10.2	94.7	334
Iron	7439-89-6	--	10,000	µg/L	77.0	47.3 J	286	1,880	147	372	732	2,060
Lead	7439-92-1	0.540	240	µg/L	0.781	0.613	3.12	2.53	0.122	0.0879 J	2.06	5.53
Zinc	7440-66-6	36.0	240	µg/L	8.09	11.6	58.7 J	174	96.2	39.8	246 J	521

Notes:

-- Not applicable.

Italics Non-detect exceedance of the screening criteria.

RED BOLD Detected exceedance of the screening criterion.

RED BOLD Detected exceedance of both the screening criterion and the benchmark.

1 Parameters listed are those specified in the Consent Order for requiring source control.

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3 Benchmarks and Impairment Pollutant Reference Concentrations as presented in Vigor's 2021–2025 National Pollutant Discharge Elimination System 1200-Z General Industrial Stormwater Permit No. 70596.

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Abbreviations:

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mg/L Milligrams per liter

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S.U. Standard Units

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Qualifier:

< Analyte was not detected at the given method detection limit.

J Concentration is an estimate.

Table 2
Stormwater Performance Monitoring Sample Analytical Data

Location Name					Q (007)					
Source Control Measure					EC System		Removal Efficiency ⁽¹⁾	EC System		Removal Efficiency ⁽¹⁾
Sample Name					EC(007)-110625-Inf	EC(007)-110625-Eff		Q(007)-121925-Inf	Q(007)-121925-Eff	
Sample Date					11/6/2025	11/6/2025		12/19/2025	12/19/2025	
Analyte ⁽²⁾	CAS No.	Consent Order Screening Criteria ⁽³⁾	2021 to 2025 1200-Z Permit Benchmarks/Impairment Reference Concentrations ⁽⁴⁾	Unit						
Conventionals										
pH	pH	--	--	pH	7.08	6.70		7.29	6.23	
Nitrate + Nitrite (as Nitrogen)	--	--	10.0	mg/L	0.129	0.133	-3.1%	0.0450	0.0510	-13%
Total Suspended Solids	TSS	--	30.0	mg/L	25.0	<10.0	60%	7.00 J	5.00 J	29%
Total Metals										
Aluminum	7429-90-5	87.0	1,100	µg/L	545	839	-54%	221	441	-100%
Copper	7440-50-8	2.70	15.0	µg/L	88.2	5.46	94%	95.0	4.62	95%
Iron	7439-89-6	--	10,000	µg/L	7,080	569	92%	2,030	439	78%
Lead	7439-92-1	0.540	240	µg/L	1.73	<1.00 ⁽⁵⁾	42%	3.53	0.101	97%
Zinc	7440-66-6	36.0	240	µg/L	721	19.2	97%	490	19.4	96%

Notes:

- Blank cells are intentional.
- Not applicable.
- Italics* Non-detect exceedance of the benchmark.
- RED BOLD** Detected exceedance of the screening criterion.
- RED BOLD** Detected exceedance of both the screening criterion and the benchmark.
- 1 Removal Efficiency is not calculated when both the influent and effluent concentration were non-detect. Removal efficiency is estimated when influent concentration is detected and effluent concentration is not detected
- 2 Parameters listed are those specified in the Consent Order for requiring source control.
- 3 Screening Criteria of CULs presented in Table 17 of the 2017 USEPA Portland Harbor Record of Decision or screening level values from Table 3-1 of ODEQ's 2005 Joint Source Control Strategy where a CUL does not exist.
- 4 Benchmarks and Impairment Pollutant Reference Concentrations as presented in Vigor's 2021–2025 National Pollutant Discharge Elimination System 1200-Z General Industrial Stormwater Permit No. 70596
- 5 Laboratory noted that the reporting limit was raised due to matrix interference.

Abbreviations:

- CAS Chemical Abstracts Service
- CUL Cleanup level
- µg/L Micrograms per liter
- mg/L Milligrams per liter
- ODEQ Oregon Department of Environmental Quality
- S.U. Standard Units
- USEPA U.S. Environmental Protection Agency

Qualifier:

- < Analyte was not detected at the given method detection limit.
- J Concentration is an estimate.

Table 3
Building 72 Source Tracing Influent Sample Analytical Data

Location Name					CB-200	CB-201	CB-202	CB-203
Sample Name					CB200-121825-Inf	CB201-121825-Inf	CB202-121825-Inf	CB203-121825-Inf
Sample Date					12/18/2025	12/18/2025	12/18/2025	12/18/2025
Analyte ⁽¹⁾	CAS No.	Consent Order Screening Criteria ⁽²⁾	2021 to 2025 1200-Z Permit Benchmarks or Impairment Reference Concentrations ⁽³⁾	Unit				
Conventionals								
pH	pH	--	--	pH	7.76			
Total Metals								
Aluminum	7429-90-5	87.0	1,100	µg/L	2,190	1,230	84.1	760
Copper	7440-50-8	2.70	15.0	µg/L	960	596	48.9	124
Iron	7439-89-6	--	10,000	µg/L	6,980	3,690	271	3,050
Lead	7439-92-1	0.540	240	µg/L	13.1	6.12	0.697	1.92
Zinc	7440-66-6	36.0	240	µg/L	339	308	126	164

Notes:

Blank cells are intentional.

-- No standard.

RED BOLD Detected exceedance of the screening criterion.

RED BOLD Detected exceedance of both the screening criterion and the benchmark.

1 Parameters listed are those specified in the Consent Order for requiring source control.

2 Screening criteria of CULs presented in Table 17 of the 2017 USEPA Portland Harbor Record of Decision or screening level values from Table 3-1 of ODEQ's 2005 Joint Source Control Strategy where a CUL does not exist.

3 Benchmarks and impairment pollutant reference concentrations are as presented in Vigor's 2021–2025 National Pollutant Discharge Elimination System 1200-Z General Industrial Stormwater Permit No. 70596.

Abbreviations:

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CUL Cleanup level

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