

MEMORANDUM | June 17, 2026

TO Jim Orr and David Lacey, Oregon Department of Environmental Quality (DEQ)

FROM Peter Shanahan, HydroAnalysis LLC (HALLC); Jennifer Hart and Gail Fricano, Industrial Economics, Inc. (IEc)

SUBJECT Five Tribe review of “Storm Water and Ground Water Source Control Evaluation Report” for the Lampros Steel upland site, dated April 27, 2026

This memorandum, submitted on behalf of the Five Tribes,¹ reviews the *Storm Water and Ground Water Source Control Evaluation Report* (SCE Report) for the Lampros Steel upland site prepared by EVREN Northwest, Inc. on behalf of Johnson-Lampros Warehouse LLC (EVREN Northwest 2026).

General Comments

1. We concur with the findings of the SCE Report that no further investigation and/or remedial action is required at this site provided that ongoing stormwater management continues and no new releases occur on site. Samples collected for both stormwater and groundwater show only low levels of contaminants of interest, and none pose a threat of recontamination.

Specific Comments

2. Section 2.2 indicates that there is a covered fuel station on the site but includes no mention of storage tanks. Those are eventually described in Section 3.2.1. We recommend that Section 2.2 describe the former underground storage tanks (USTs) and existing above ground storage tanks (ASTs), their disposition, and any contamination discovered in the area of the USTs. Locations of former and existing tanks should be shown on appropriate site maps.
3. The report is confusing with respect to the division of the site into separate drainage basins. Section 2.7.1 references the “northeast and northwest drainage basins,” and Section 2.7.2 references the “southern drainage basin.” Similarly, Section 2.7.2 identifies one source control measure as “Dividing the site into four sub-basins, allowing for more focused source control solutions and performance monitoring.” However, Section 2.8 states “The subject site consists of one large drainage basin.” We recommend these discrepancies be corrected and Figure 3 be modified to show the division of the site into separate drainage basins to the extent there are such.
4. Section 2.7.2 identifies another source control measure as “Prohibiting vehicle cleaning, maintenance, and repair activities.” This appears to be contradicted by the text of Section 2.2

¹ The five tribes are the Confederated Tribes of the Grand Ronde Community of Oregon, the Nez Perce Tribe, the Confederated Tribes of Siletz Indians, the Confederated Tribes of the Umatilla Indian Reservation, and the Confederated Tribes of the Warm Springs Reservation of Oregon.

which states, “A 6-acre portion of the site is operated by Shippers Transport Express for storage of trailers and some routine trailer maintenance including minor brakes repair, wheel/tire assembly replacement, electrical service, air pressure testing, lockdown and landing gear service.” We recommend this apparent contradiction be reconciled.

5. Section 2.7.2 states “In November 2019, Krystar filter inserts were installed in all catch basins in the southern drainage basin (see Figure 3).” The southern drainage basin is not delineated or labeled in Figure 3, making it unclear which catch basins are referenced in this text. We recommend that the catch basins be identified by number in the text.
6. Section 2.7.2 indicates that catch basin cleaning is conducted every two months (starting December 2019) and monthly (without indicating a date), creating ambiguity as to the current frequency of cleaning. We recommend a date be given for the change to monthly cleaning and that language be added to indicate if that remains the current frequency.
7. Section 2.7.3 states “Since completion of the 2021 source control measure implementation, off-site sources have been eliminated...” We recommend saying that stormwater from off-site sources have been diverted around the on-site system.
8. Section 2.8 identifies “An asphalt berm located along N. Burgard way [sic] on the northeastern property boundary”; however, Figure 3 seems to show two separate surface barriers.
9. Section 2.8 identifies two trench drains as part of the stormwater system, but no trench drains are shown on Figure 3.
10. The description in Section 2.8 of the stormwater treatment vault as “The PerkFilter™ is a media-filled cartridge filtration device...” fails to describe the means by which stormwater is treated. We recommend, at minimum, indicating that the product uses “zeolite-perlite-carbon (ZPC) filter media” as indicated by Washington Ecology (2026) and that the manufacturer attributes treatment to “sedimentation, filtration and sorption” (OldCastle 2025). Further, we recommend describing the specific treatment mechanisms that address each of the identified contaminants of interest.
11. Section 5.0 lists components that are not described in the text or shown in figures. We recommend more description be provided for the following:
 - i. Drain and oil-water separator (OWS) near the fuel station; we recommend describing how the “plugged” OWS is emptied and the schedule for inspecting and emptying.
 - ii. Secondary containment; we recommend describing secondary containment features and the tanks and other infrastructure associated with those features in the text and also showing them on Figure 3.
12. Section 6.2 indicates that monitoring wells were drilled on site. Well logs should be provided in an appendix to the report.

Editorial Comments

13. There are numerous typographical and grammatical errors throughout the report. We recommend the report be proofread before it is resubmitted.

14. Throughout the report, stormwater and groundwater are spelled variously with one word or two words.
15. On page 4, Cascadia Associated should be Cascadia Associates.
16. Section 2.7.3 describes installation of a storm-water treatment vault while Figure 3 shows a stormwater management vault. We recommend using consistent terminology and spelling.
17. Replace “down-gradient” with “downstream” when describing storm sewer connections in Section 2.7.3.

References

- EVREN Northwest, Inc. (EVREN Northwest). 2026. Storm Water and Ground Water Source Control Evaluation Report (Post Source Control Measures Performance Monitoring), Lampros Steel, 9040 North Burgard Way, Portland, Oregon 97203. Prepared for: Johnson-Lampros Warehouse LLC. EVREN Northwest, Inc., Portland, Oregon. April 27, 2026.
- OldCastle Infrastructure (OldCastle). 2025. PerkFilter™ Media Filtration. June 2025.
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- Washington State Department of Ecology (Washington Ecology). 2026. General Use Level Designation for Basic and Phosphorus Treatment for Oldcastle Precast, Inc., PerkFilter™ (using ZPC Filter Media). April 2026.
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