PORSF
113.245.1V58

NPDES 1200-Z General Permit for Storm Water Runoff
Discharge Monitoring Report

Complete report and send once a year by July 15 to:
Oregon DEQ

Legal Name:

Site/File ID #:

Common Name: SCHNITZER STEEL

County:

Facility Location:

Reporting period: July 1, _____ to June 30, _____

Twice a Year Sampling

Monitor for the following pollutants at the monitoring points specified in your Storm Water Pollution Control Plan (SWPCP). Add more sheets if you have more than three monitoring points.

Pollutant Sample 2/Year, Each Monitoring Point[1]	Date of Sample	Monitoring Points #	#	#
Total copper – If value exceeds 0.1 mg/l, review/revision of SWPCP required				
Total lead – If value exceeds 0.4 mg/l, review/revision of SWPCP required				
Total zinc – If value exceeds 0.6 mg/l, review/revision of SWPCP required				
pH – If value is outside of 5.5 to 9.0 S.U., review/revision of SWPCP required[2]				
Total suspended solids – If value exceeds 130 mg/l, review/revision of SWPCP required[2]				
Oil and grease– If value exceeds 10 mg/l, review/revision of SWPCP required[2]				
E. coli – If value exceeds 406 counts/100 ml, review/revision of SWPCP required. Only applies to landfills accepting septage/biosolids and sewage treatment plants.				

See reverse side for additional visual monitoring and signature for report.

[1] Monitoring frequency may be reduced under some circumstances – refer to page 10 of your permit. If monitoring requirements have been waived, please write in "WAIVED" for that pollutant.
[2] Separate effluent limits for these pollutants apply for coal fired power plants, cement plants, and/or roofing or asphalt paving operations.

USEPA SF
1336475
SCHN00245423

Monthly Visual Observations

Parameter and Requirements	Monitoring #		Monitoring #		Monitoring #	
	Sample Date	Results	Sample Date	Results	Sample Date	Results
Oil and Grease Sheen - No visible sheen allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						
Floating Solids (associated with industrial activities) – No visible discharge allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						

Note – If there are any monitored results that exceed the benchmark values, you must review and revise as necessary your SWPCP within 60 days of exceeding the benchmark. SWPCP revisions must be submitted to DEQ within 14 days of completion.

Signature Requirement

I certify, under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature of Responsible Official: _____

Name and Title (Please Print): _____

Date of Signature: _____ **Telephone:** _____

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

Water Pollution Control Laboratory

6543 N. Burlington Avenue, Room 217, Portland, Oregon 97203 ▪ Sam Adams, Commissioner ▪ Dean Marriott, Director

June 23, 2006

MATT CUSMA
PO BOX 10047
PORTLAND, OR 97296

Subject: 1200-Z or 1300-J NPDES Permit annual monitoring data submission deadline: **July 15, 2006**

Dear MATT CUSMA:

PLEASE IGNORE IF YOU HAVE ALREADY SUBMITTED YOUR COMPLETE MONITORING DATA REPORT TO BOTH THE CITY OF PORTLAND AND THE DEPARTMENT OF ENVIRONMENTAL QUALITY.

The 1200-Z Stormwater Permits require sampling two stormwater events per rain-year, between July 1 and June 30, at all designated site sampling locations. These monitoring data must be submitted to both the Oregon Department of Environmental Quality (DEQ) and the City of Portland (City) per Schedule B.3 of the permit. If you were required to review your Storm Water Pollution Control Plan (SWPCP) due to benchmark exceedences, submit your report with the monitoring data. Monthly visual monitoring data are required to be submitted ONLY to the DEQ.

You must submit your Annual Report to both the DEQ and City by **July 15, 2006**.

1. Monitoring results for all sampling events, including:
   a. Monitoring report form given on the back of this letter
   b. Laboratory reports
   c. Chains of Custody

2. Stormwater Pollution Control Plan (SWPCP) review (Only required if benchmark exceedences have occurred).

Additionally, please submit ONLY to DEQ:

1. Monthly visual monitoring data.

To:

Mr. Dennis Jurries
Oregon Department of Environmental Quality
Northwest Water Quality Division
2020 SW 4th Avenue, suite 400
Portland, OR 97201-4987

Mr. Aaron Wieting
City of Portland
Industrial Stormwater Program
6543 N Burlington Avenue
Portland, OR 97203-5452

If you have any questions regarding this matter, please contact me at (503) 823-7088 or Dennis Jurries at (503) 823-7577.

Sincerely,

Aaron Wieting
Industrial Stormwater Program

City of Portland
Environment Services
Industrial Stormwater

INDUSTRIAL STORMWATER PROGRAM
NPDES 1200-Z MONITORING REPORT

Industry Name: SCHNITZER STEEL INTERNATIONAL
Site Address: PO BOX 10047

The Permittee shall monitor stormwater **twice** per year (October – December) and (January – April for the parameters outlined in their NPDES 1200-Z Stormwater discharge Permit Schedule B.1.a. The Permittee shall perform visual observations on a **monthly** basis as outlined in Schedule B of the Permit. The Permittee shall submit monitoring data results to the City and the DEQ as stated in Schedule D.2.

Stormwater samples were taken for the above Permittee, on these days and at these sample points:

Sampling Dates	Sampling Points

The Permittee shall submit by **July 15** of each year a copy of the **laboratory analysis reports,** which show analytical methods and detection limits, for stormwater samples collected for the previous monitoring year (July 1-June 30).

☐ **Monitoring Waiver Reduction Notification:**

Check the box if your facility is exercising a waiver of monitoring based on meeting benchmarks listed in Schedule A.9, AND site conditions have not changed to impact stormwater runoff. Note: This does not exclude your facility from notifying DEQ about the waiver of monitoring. Please read Schedule B of the permit to clearly understand the monitor waiver reduction guidelines. If waiver request is for select pollutants, list the parameters excluded from monitoring:_____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware hat there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:_____

Title:_____

Date:_____

Monthly Visual Observations

Parameter and Requirements	Monitoring #		Monitoring #		Monitoring #	
	Sample Date	Results	Sample Date	Results	Sample Date	Results
Oil and Grease Sheen - No visible sheen allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						
Floating Solids (associated with industrial activities) – No visible discharge allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						

Note – If there are any monitored results that exceed the benchmark values, you must review and revise as necessary your SWPCP within 60 days of exceeding the benchmark. SWPCP revisions must be submitted to DEQ within 14 days of completion.

Signature Requirement

I certify, under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature of Responsible Official: _____

Name and Title (Please Print): _____

Date of Signature: _____ **Telephone:** _____

NPDES 1200-Z General Permit for Storm Water Runoff
Discharge Monitoring Report

Complete report and send once a year by July 15 to:
Oregon DEQ

Legal Name: EDMOND CORP.

Site/File ID #:

Common Name: SCHNITZER STEEL

County:

Facility Location:

Reporting period: July 1, _____ to June 30, ____

Twice a Year Sampling

Monitor for the following pollutants at the monitoring points specified in your Storm Water Pollution Control Plan (SWPCP). Add more sheets if you have more than three monitoring points.

Pollutant Sample 2/Year, Each Monitoring Point[1]	Date of Sample	Monitoring Points #_____	#_____	#_____
Total copper – If value exceeds 0.1 mg/l, review/revision of SWPCP required				
Total lead – If value exceeds 0.4 mg/l, review/revision of SWPCP required				
Total zinc – If value exceeds 0.6 mg/l, review/revision of SWPCP required				
pH – If value is outside of 5.5 to 9.0 S.U., review/revision of SWPCP required[2]				
Total suspended solids – If value exceeds 130 mg/l, review/revision of SWPCP required[2]				
Oil and grease– If value exceeds 10 mg/l, review/revision of SWPCP required[2]				
E. coli – If value exceeds 406 counts/100 ml, review/revision of SWPCP required. Only applies to landfills accepting septage/biosolids and sewage treatment plants.				

See reverse side for additional visual monitoring and signature for report.

[1]Monitoring frequency may be reduced under some circumstances – refer to page 10 of your permit. If monitoring requirements have been waived, please write in "WAIVED" for that pollutant.
[2] Separate effluent limits for these pollutants apply for coal fired power plants, cement plants, and/or roofing or asphalt paving operations.

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

James F [illegible]
Inspector Signature

December 3, 2007
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Filters present	X					
Grates in good condition	X					
Other	—	—	NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement		X	Post Construction	Speak with Management	—	
Condition/repair		X	" "	" "		
Swept/free of buildup		X	" "	" "		
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other		X	Construction Debris Piles	Speak with Management	—	
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

[signature]
Inspector Signature

November 9, 2007
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Filters present	X					
Grates in good condition	X					
Other	—	—	NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement		X	Post Construction	Speak with Management	—	—
Condition/repair		X	" "	" "	—	—
Swept/free of buildup		X	" "	" "	—	—
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other		X	Construction Debris Piles	Speak with Management	—	—
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245432

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [illegible]

Date: October 11, 2007

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Filters present	X					
Grates in good condition	X					
Other	—	—	NA		—	
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement		X	Post Construction	Speak with Management	—	
Condition/repair		X	↓			
Swept/free of buildup		X				
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other		X	Construction Debris Piles	Speak with Management	—	
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [signature]

Date: 9-18-07

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Filters present	X					
Grates in good condition	X					
Other	—	—	NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement		X	Construction	Speak with Management	—	
Condition/repair		X	Construction	" "	—	
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other		X	Construction Debris Piles	Speak with Management	—	
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [signature]

Date: August 22, 2007

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Filters present	X					
Grates in good condition	X					
Other	—	—	NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement		X				
Condition/repair		X	Construction ongoing	Reinspect after complete	—	
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other		X	Construction Debris Piles	Talk with Engineering Team	—	
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

James L. [illegible]
Inspector Signature

July 8, 2007
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Filters present	X					
Grates in good condition	X					
Other	—	—	NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair		X	Construction on-going	Re-inspect after complete	—	—
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other		X	Construction debris piles	Talk with Engineering Team		
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [illegible]

Date: June 13, 2007

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Filters present	X					
Grates in good condition	X					
Other	—	—	NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	—	—	NA - Vehicles stored on concrete slabs			
Pavement	X					
Condition/repair		X	Construction ongoing	Re-inspect after construction	—	
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X	X	Construction debris piles	Talk with contractors		
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [signature]

Date: May 20, 2007

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Filters present	X					
Grates in good condition	X					
Other	—	—	NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	—	—	NA			
Pavement	X					
Condition/repair		X	Construction on-going	Re-inspect after construction	—	—
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other		X	Construction debris piles	talk with contractors	21 May 07	gig
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

James F. [illegible]
Inspector Signature

April 23, 2007
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Filters present	X					
Grates in good condition	X					
Other	—	—	NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair		X	On-going construction	Re-inspect after construction	—	—
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	—	—	NA			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [illegible]

Date: 12 March 2007

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Filters present	X					
Grates in good condition	X					
Other	—	—	NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	—	—	NA			
Pavement		X	Construction on-going	Re-inspect after construction		
Condition/repair		X				
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	—	—	NA			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

9 February 2007
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Filters present	X					
Grates in good condition	X					
Other			NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place			NA			
Pavement		X	Construction on-going	ok after construction complete		
Condition/repair		X				
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

January 31, 2007
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Filters present	X					
Grates in good condition	X					
Other	—	—	NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement		X	Construction on-going	ck after complete		
Condition/repair		X	" "	" "		
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

Inspector Signature

December 1, 2006
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)			Not Applicable			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other			Not Applicable			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245443

Inspector Signature

November 13, 2006
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X		Several locations covered with scrap	Observe as available	on-going	[illegible]
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
~~Stencils legible (where appropriate)~~			Not Applicable			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
~~Other~~			Not Applicable			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245444

Inspector Signature

October 15, 2006
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X		Several locations covered with scrap	Observe when uncovered	on-going	JFP
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
~~Stencils legible (where appropriate)~~			Not Applicable			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X		Several locations covered with plate	None		
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
~~Other~~			Not Applicable			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245445

Inspector Signature

September 26, 2006
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X		Several locations covered with scrap	Observe when uncovered	on-going	[illegible]
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
~~Stencils legible (where appropriate)~~			Not Applicable			
Vehicles/Equipment	X					
Oil leaks	X		None observed			
Drip pans in place	X					
Pavement	X					
Condition/repair	X		Several locations covered with plate	None		
Swept/free of buildup	X		OK - CCS nightly			
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
~~Other~~			Not Applicable			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245446

Inspector Signature

August 26, 2006
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)			Not Applicable			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair		X	Needs work	Potholes need fixing		
Swept/free of buildup		X		More sweeping		
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other			Not Applicable			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245447

Inspector Signature

July 18, 2006
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
~~Stencils legible (where appropriate)~~			Not Applicable			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair		X	Needs additional work	Fix Potholes		
Swept/free of buildup		X	Needs additional work	More Sweeping		
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other			Not Applicable			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245448

Inspector Signature

June 30, 2006
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
~~Stencils legible (where appropriate)~~						
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
~~Other~~						
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

Jim Jakubiak
Inspector Signature

May 19, 2006
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
~~Stencils legible (where appropriate)~~						
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
~~Other~~			NA			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245450

Inspector Signature

April 11, 2006
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
~~Stencils legible (where appropriate)~~						
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
~~Other~~						
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245451

Inspector Signature

March 7, 2006
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present / Socks	X		Need to replace some			
Grates in good condition	X		Need to ck scrap pile grates when visible			
~~Stencils legible (where appropriate)~~						
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X		None needed			
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other						
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245452

J. Jakubiak
Inspector Signature

February 22, 2006
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present / socks	X		Need socks at some locations			
Grates in good condition	X					
~~Stencils legible (where appropriate)~~						
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
~~Other~~						
Spill response kits	X					
Unnacceptable or suspect materials		X	Need to talk with construction			
Containers	X		Team			
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245453

Inspector Signature

January 9, 2006
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X		Some in scrap pile areas need checking			
~~Stencils legible (where appropriate)~~						
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X		No Drips, No pans, OK			
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
~~Other~~						
Spill response kits	X					
Unnacceptable or suspect materials		X	Need to have construction crew make improvements			
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245454

Inspector Signature

Dec 17, 2005
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
~~Stencils legible (where appropriate)~~						
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
~~Other~~						
Spill response kits	X					
Unnacceptable or suspect materials		X	Talk with Josh & Jimmie			
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245455

Inspector Signature

November 25, 2005
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
~~Stencils legible (where appropriate)~~						
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other		X	Need to talk with J.P. & J.W.			
Spill response kits	X					
Unnacceptable or suspect materials		X	Need to talk with J.P. & J.W.			
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245456

Inspector Signature

October 5, 2005
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
~~Stencils legible (where appropriate)~~						
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X		Need to talk with construction crews			
Trailer sweep-off bins	X					
Trash dumpsters	X					
~~Other~~						
Spill response kits	X					
Unnacceptable or suspect materials	X		Need to talk with construction crews			
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245457

Inspector Signature

September 21, 2005
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
~~Stencils legible (where appropriate)~~						
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
~~Other~~						
Spill response kits	X		Need to check with Heath F. about shredder kit			
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245458

Inspector Signature

August 12, 2005
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present /socks	X					
Grates in good condition	X					
~~Stencils legible (where appropriate)~~	—	—				
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X		None needed			
Pavement	X		Checked with Larry S. - CCS still sweeps everyday.			
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X		Need to talk with construction crew.			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Property labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245459

Inspector Signature

July 11, 2005
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present / Socks	X					
Grates in good condition	X					
Stencils legible (where appropriate)	—	—	NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	—	—	NA			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245460

Inspector Signature

June 15, 2005
Date

(Day)

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	—	—	Not Applicable			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	—		Not Applicable			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245461

Inspector Signature

May 23, 2005
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)			NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other			NA			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245462

Inspector Signature

April 19, 2005
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)			NA			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other			NA			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245463

Inspector Signature

March 16, 2005
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present / Socks	X					
Grates in good condition	X					
Stencils legible (where appropriate)	—		Not Applicable			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X		Not Applicable - Yard Looks Good		3-19-05	JJ
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245464

Inspector Signature

February 13, 2005
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present/Socks	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	Can't see			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X		Think about doing overall spring clean up in yard			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245465

Inspector Signature

January 17, 2005
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present / Socks	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	Can't see stencils			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245466

Inspector Signature

December 13, 2004
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present / Socks	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	Can't see stencils	Reevaluate whether this is needed		
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245467

Inspector Signature

November 18, 2004
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present / Socks	X		Socks present			
Grates in good condition	X					
Stencils legible (where appropriate)	X				Nov. 1	JJ
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

Inspector Signature

October 13, 2004
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	Can't see stencils	Talk with maintance again		
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

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SCHN00245469

Inspector Signature

9-16-04
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present / Socks	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	Not observable			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

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SCHN00245470

Inspector Signature

August 16, 2004
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X		Not Applicable - Socks acceptable			
Grates in good condition	X					
Stencils legible (where appropriate)		X	Can't see stencils - wore out			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other			Not Applicable			
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

NR

SCHN00245471

Inspector Signature

July 12, 2004
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X		Plates in-place at numerous locations		7/31/04	JG
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245472

Inspector Signature

June 11, 2004
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X		Plates in-place @ numerous locations		7-31-01	CG
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245473

Inspector Signature

May 8, 2004
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X		Catch basin in Basin 3 plugged	Need to unplug, vacuum		
Skimmers present	X					
Grates in good condition	X		Need to fabricate new cover - SW Management Unit - Building B			
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X		See previous inspection			
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

* All catch basins and systems cleaned in late April early May 2004. Sand replaced in all filter systems.

SCHN00245474

Inspector Signature

April 19, 2004
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X		Need to repair broken cover - Building B	Replace Cover - SW Management		
Stencils legible (where appropriate)		X	Stencil catch basins	Stencil in areas of public	4/28/04	[illegible]
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X		Plates over areas of bad potholes	Repair in dry weather		
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245475

Inspector Signature

March 18, 2004
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	See previous inspections			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X		Several areas of the site have potholes	Repair in dry weather period	4/19/04	JJ
Condition/repair	X		Plates placed over bad potholes			
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X				Verified Completed	
Trailer sweep-off bins	X		Talked with maintenance	Empty next week	4/19/04	JJ
Trash dumpsters	X		Talked with maintenance	Empty next week	4/12/04	JJ
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245476

Inspector Signature

February 8, 2004
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative		X	See 1/29/04 inspection		2/24/04	GH
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	See 1/29/04 inspection			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement		X	See 1/29/04 inspection			
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits			See 1/29/04 inspection		2/24/04	GH
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245477

Inspector Signature

1/29/04
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative		X	Need to unplug catch basin - Basin 3	Clean & vacuum	2/24/04	[illegible]
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	Needs work	Stencil in Spring		
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement		X	Areas need work -	repair potholes		
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits		X	Need to repair spill kit on barge	Repair hole in cover, replace	2/14/04	[illegible]
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245478

Inspector Signature

December 29, 2003
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	Stencil when weather improves	Head new paint		
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X		Checked with maintenance-illegible			
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245479

Inspector Signature

November 17, 2003
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	FADED	Needs new paint		
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

Note: All drains and retention systems cleaned in October 2003. Sand replaced in all filters.

SCHN00245480

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [illegible]

Date: 07 OCT 03

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X				
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

Inspector Signature

July 2, 2003
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X				
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

* Very dry month - little rain

SCHN00245482

Inspector Signature

August 1, 2003
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X				
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X		Repairs made to asphalt			
Condition/repair	X		throughout yard this month			
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

* Very dry month - little rain

SCHN00245483

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [signature]

Date: June 13, 2003

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X		One grate needs repair - bin near gate 5	Replace grate	9/03	[illegible]
Stencils legible (where appropriate)		X	Faded	Need stencil / Repainting		
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X		See comment below			
Floating solids	X		↓			
Oil&Grease sheen	X					
Oil/Water Separators	X		Recently cleaned - good			
Sediment buildup	X		No - see above			

* Very dry month - very little to no rain.

SCHN00245484

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [illegible]

Date: 16 MAY 03

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	FADED	NEED STENCIL / REPAINTING		
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [signature]

Date: 07 APR 03

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	ILLEGIBLE - FADED	NEED STENCIL FOR PAINTING		
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X		REDUCE # OF EMPTIES IN CONT. AREA		May 3, 03	SHY
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

07 MAR 03
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	FADED - ILLEGIBLE	NEEDS REPAINTING		
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X		NEED TO BE EMPTIED - BERTH 5		3/7/03	[illegible]
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X		C/O OUTFALL 2 o/w SEP		3/10/03	[illegible]
Sediment buildup	X					

SCHN00245487

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

17 FEB 03
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)		X	NEED REPAINTING			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245488

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [signature]

Date: 13JAN03

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [illegible]

Date: 10 DEC 02

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245490

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

13 NOV 02
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [signature]

Date: 03OCT02

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	✓					
Unobstructed/operative	✓					
Skimmers present	✓					
Grates in good condition	✓					
Stencils legible (where appropriate)	✓					
Vehicles/Equipment	✓					
Oil leaks	✓					
Drip pans in place	✓		DRIP PANS MUST BE STORED WHEN NOT IN USE			
Pavement	✓					
Condition/repair	✓					
Swept/free of buildup	✓					
Evidence of spill or leakage	✓					
Debris, refuse	✓					
Trailer sweep-off bins		✓	NEED TO BE CLEANED OUT		10/4/02	MJC
Trash dumpsters	✓					
Other	✓					
Spill response kits	✓					
Unnacceptable or suspect materials	✓					
Containers	✓					
Kept closed	✓					
Properly labeled	✓					
In good condition	✓					
No signs of leakage or spillage	✓					
Outfalls	✓					
Floating solids	✓					
Oil&Grease sheen	✓					
Oil/Water Separators	✓					
Sediment buildup	✓					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

[signature] Inspector Signature

September 30, 2002 Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X		Grates scheduled for repair near bulk mat.		10/17/02	JTJ
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X		some areas marked for repair		10/08/02	JTJ
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X		Checked with maintenance - will do		10/2/02	JTJ
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

* Generally dry month. Rained on day of inspection.

SCHN00245493

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

[signature] Inspector Signature

August 30, 2002 Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition		X	med work in area of bulk materials		9/4/02	[initials]
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement						
Condition/repair	X		Some areas marked for repair		10/08/02	[initials]
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X		Clean			
Trash dumpsters	X		Keep lids closed		9/2/02	[initials]
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

* Dry month - no rain

SCHN00245494

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

J. [illegible] — Inspector Signature

July 15, 2002 — Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X		Socks in good condition			
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X		Done this past weekend			
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X		Keep lids closed			
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

July 7, 2002 - Did outfall inspections. No sheen & no discharge.

SCHN00245495

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

June 21, 2002
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X		Need to watch locations by bulk storage			
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245496

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

J. Johnlich
Inspector Signature

May 22, 2002
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

09 APR 02
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X		SOCKS TO BE REPLACED LATER THIS MONTH			
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup		X	SWEEPING NEEDED AT SHREDDER	SCHEDULED THIS AFTERNOON	4/9/02	MJC
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245498

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [illegible]

Date: 11 MAR 02

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

19 FEB 02
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245500

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

07 JAN 02
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	/ Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

13 DEC 01
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245502

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

13 NOV 01
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

29 OCT 01
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative						
Skimmers present						
Grates in good condition						
Stencils legible (where appropriate)						
Vehicles/Equipment						
Oil leaks						
Drip pans in place						
Pavement						
Condition/repair						
Swept/free of buildup						
Evidence of spill or leakage						
Debris, refuse						
Trailer sweep-off bins						
Trash dumpsters						
Other						
Spill response kits						
Unnacceptable or suspect materials						
Containers						
Kept closed						
Properly labeled						
In good condition						
No signs of leakage or spillage						
Outfalls						
Floating solids						
Oil&Grease sheen						
Oil/Water Separators						
Sediment buildup	X					

SCHN00245504

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

26 SEP 01
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	/ Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

22 AUG 01
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245506

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

16 JULY 01
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X		NEW ASPHALT OVER SAND FILTERS	NEEDS ATTENTION		
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

J. Johnson
Inspector Signature

June 27, 2001
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245508

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

15 May 2001
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

J. Schulich
Inspector Signature

May 21, 2001
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X		See April Report			
Stencils legible (where appropriate)	X		" " "			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245510

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

J. [illegible] — Inspector Signature

April 10, 2001 — Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X		Needs work	after sw project complete survey all and redo as needed.		
Stencils legible (where appropriate)	X		Needs work			
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	✓					

SCHN00245511

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

27 MAR 01
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245512

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [illegible]

Date: 21 FEB01

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245513

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [illegible]

Date: 18 JAN 01

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins		X	NEED TO BE CLEANED OUT		4/19/01	MJP
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [illegible]

Date: 19 DEC 00

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245515

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [illegible]

Date: 23 NOV 00

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

20 OCT 00
Date

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

10 SEP 2000
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X		DUMPSTER AT BERTH 5 NEEDS EMPTY		11SEP00	MJC
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

18 AUG 00
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X		NO DISCHARGE OBSERVED			
Oil&Grease sheen	X		" " "			
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245519

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

03 JUL 00
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X		NO OBSERVED DISCHARGE			
Oil&Grease sheen	X		" " "			
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245520

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

13 JUN 00
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: _____ Date: 11 MAY 00

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245522

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: [signature]

Date: 14 APR 00

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins		X	NEW PILLOWS NEEDED IN FRONT OF SCRAP OFFICE	REPLACE	4/28/00	[illegible]
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other		X	DOCK CURB NEEDS LITTER N/U	GET VAC SWEEPER ONSITE	4/19/00	[illegible]
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245523

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature: _____ Date: 10 MAR 00

MONTHLY INSPECTION ITEMS						
Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

14 FEB 2000
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	✓					
Unobstructed/operative	✓					
Skimmers present	✓					
Grates in good condition	✓					
Stencils legible (where appropriate)	✓					
Vehicles/Equipment	✓					
Oil leaks	✓					
Drip pans in place	✓					
Pavement	✓					
Condition/repair	✓					
Swept/free of buildup	✓					
Evidence of spill or leakage	✓					
Debris, refuse	✓					
Trailer sweep-off bins	✓					
Trash dumpsters	✓					
Other	✓					
Spill response kits	✓					
Unnacceptable or suspect materials	✓					
Containers	✓					
Kept closed	✓					
Properly labeled	✓					
In good condition	✓					
No signs of leakage or spillage	✓					
Outfalls	✓					
Floating solids	✓					
Oil&Grease sheen	✓					
Oil/Water Separators	✓					
Sediment buildup	✓					

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

12 JAN 00
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place	X					
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245526

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

[signature]
Inspector Signature

21 DEC 99
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place		X	NOT IN USE UNDER DUMP TRUCKS	SPOKE W/ FOREMAN RE USE	12/22/99	[initials]
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters		X	FULL	EMPTIED	12/21/99	[initials]
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X		NOT RAINING			
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245527

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

30 NOV 99
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status: Acceptable	Status: Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	✓					
Unobstructed/operative	✓					
Skimmers present	✓					
Grates in good condition	✓					
Stencils legible (where appropriate)	✓					
Vehicles/Equipment	✓					
Oil leaks	✓					
Drip pans in place	✓					
Pavement	✓					
Condition/repair	✓					
Swept/free of buildup	✓					
Evidence of spill or leakage	✓					
Debris, refuse	✓					
Trailer sweep-off bins	✓					
Trash dumpsters	✓					
Other	✓					
Spill response kits	✓					
Unnacceptable or suspect materials	✓					
Containers	✓					
Kept closed	✓					
Properly labeled	✓					
In good condition	✓					
No signs of leakage or spillage	✓					
Outfalls	✓					
Floating solids	✓					
Oil&Grease sheen	✓					
Oil/Water Separators	✓					
Sediment buildup	✓					

SCHN00245528

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

15 NOV 99
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present	X					
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place		X		NEED TO HAVE PANS PLACED	11/17/99	[illegible]
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X		NO DISCHARGE			
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X					

SCHN00245529

SITE INSPECTION CHECKLIST
SCHNITZER STEEL PRODUCTS CO. - INTERNATIONAL TERMINALS
Stormwater Pollution Prevention Plan

Inspector Signature

27 OCT 99
Date

MONTHLY INSPECTION ITEMS

Inspection Items	Status Acceptable	Status Unacceptable	Comments	Recommended Corrective Action	Date Completed	Initials
Catch Basins	X					
Unobstructed/operative	X					
Skimmers present		X	SOME BASINS NEED CLEANING	GET ALL VAC OUT TO PUMP	10/28/99	W/C
Grates in good condition	X					
Stencils legible (where appropriate)	X					
Vehicles/Equipment	X					
Oil leaks	X					
Drip pans in place		X	DRIP PANS ON ORDER	ORDERED DRIP PANS	11/12/99	W/C
Pavement	X					
Condition/repair	X					
Swept/free of buildup	X					
Evidence of spill or leakage	X					
Debris, refuse	X					
Trailer sweep-off bins	X					
Trash dumpsters	X					
Other	X					
Spill response kits	X					
Unnacceptable or suspect materials	X					
Containers	X					
Kept closed	X					
Properly labeled	X					
In good condition	X					
No signs of leakage or spillage	X					
Outfalls	X					
Floating solids	X					
Oil&Grease sheen	X					
Oil/Water Separators	X					
Sediment buildup	X		CLEAN OUT ALONG W/ CATCH BASINS		10/28/99	W/C

SCHN00245530

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

Water Pollution Control Laboratory
6543 N. Burlington Ave., Portland, Oregon 97203-5452
(503) 823.5320 fax (503) 823.5559

INDUSTRIAL STORMWATER

NPDES 1200-Z MONITORING REPORT

Industry Name: **SCHNITZER STEEL INTERNATIONAL**

Site Address: **12005 N BURGARD RD, PORTLAND, OR**

The permittee shall monitor stormwater **twice** per year for the parameters outlined in their NPDES 1200-Z Stormwater Discharge Permit Schedule B.1.a., and submit results to the City as stated in Schedule D.2.

Stormwater samples were taken for the above permittee, on these days and at these sample points:

Sample Date(s)	Sample Point(s)

The permittee shall submit by **July 15** of each year a copy of the **laboratory analysis reports**, which show analytical methods and detection limits, for stormwater samples collected for the previous monitoring year (July 1-June 30).

❑ **Monitoring Waiver Reduction Notification:**
Check the box if your facility is exercising a waiver of monitoring based on meeting benchmarks listed in Schedule A.9., AND site conditions have not changed to impact stormwater run-off. Note: This does not exclude your facility from notifying DEQ about the waiver of monitoring. Please read Schedule B of the permit to clearly understand the monitor waiver reduction guidelines. If waiver request is for select pollutants, list the parameters excluded from monitoring: _____.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Title: _____

Date: _____

CITY OF PORTLAND
ENVIRONMENTAL SERVICES
Water Pollution Control Laboratory
6543 N. Burlington Ave., Portland, Oregon 97203-5452
(503) 823.5320 fax (503) 823.5959

June 28, 2005

MATT CUSMA
SCHNITZER STEEL INTERNATIONAL
PO BOX 10047
PORTLAND OR 97296

Subject: Annual Stormwater Monitoring Data Submittal

Dear MATT CUSMA:

PLEASE IGNORE THE FOLLOWING IF YOU HAVE ALREADY SUBMITTED YOUR COMPLETE MONITORING DATA PACKET TO BOTH THE CITY AND THE DEQ. As the holder of a 1200-Z NPDES Stormwater Permit, you are required to conduct two (2) monitoring events per sample point between July 1 and June 30. Your permit requires copies of your monitoring data to be submitted to the Oregon Department of Environmental Quality (DEQ) and the City of Portland. In addition, the permit requires that a copy of your monthly visual observations be sent to the DEQ. It is not necessary to submit copies of your monthly visual monitoring data to the City

Please complete the Monitoring Report Form (copy for future use) on the back of this sheet and submit it with your laboratory reports and chain of custody forms to the City. **If there were any exceedances of your benchmarks for either of your required sampling events, submit the required review of your Stormwater Pollution Control Plan (SWPCP) with this report. The data submittal deadline is July 15, 2005.**

Please submit your monitoring results and a copy of the visual observations to:

Mr. Dennis Jurries
Oregon Department of Environmental Quality
Northwest Water Quality Division
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987

Please submit your monitoring results (lab reports and chain of custody) and Monitoring Report Form to:

Attention: Wieting, Aaron
City of Portland
Industrial Stormwater Program
6543 N Burlington Avenue
Portland, OR 97203-5452

If you have any questions regarding this matter, please contact me at 503.823.7383 or Dennis Jurries of DEQ at 503.229.5937. Thank you.

Sincerely,

Wieting, Aaron

NPDES 1200-Z General Permit for Storm Water Runoff

Discharge Monitoring Report

Complete report and send once a year by July 15 to:
Oregon DEQ

Legal Name:

Site/File ID #:

Common Name: SCHNITZER STEEL

County:

Facility Location:

Reporting period: July 1, _____ to June 30, ____

Twice a Year Sampling

Monitor for the following pollutants at the monitoring points specified in your Storm Water Pollution Control Plan (SWPCP). Add more sheets if you have more than three monitoring points.

Pollutant Sample 2/Year, Each Monitoring Point[1]	Date of Sample	Monitoring Points #	#	#
Total copper – If value exceeds 0.1 mg/l, review/revision of SWPCP required				
Total lead – If value exceeds 0.4 mg/l, review/revision of SWPCP required				
Total zinc – If value exceeds 0.6 mg/l, review/revision of SWPCP required				
pH – If value is outside of 5.5 to 9.0 S.U., review/revision of SWPCP required[2]				
Total suspended solids – If value exceeds 130 mg/l, review/revision of SWPCP required[2]				
Oil and grease– If value exceeds 10 mg/l, review/revision of SWPCP required[2]				
E. coli – If value exceeds 406 counts/100 ml, review/revision of SWPCP required. Only applies to landfills accepting septage/biosolids and sewage treatment plants.				

See reverse side for additional visual monitoring and signature for report.

[1] Monitoring frequency may be reduced under some circumstances – refer to page 10 of your permit. If monitoring requirements have been waived, please write in "WAIVED" for that pollutant.
[2] Separate effluent limits for these pollutants apply for coal fired power plants, cement plants, and/or roofing or asphalt paving operations.

Monthly Visual Observations

Parameter and Requirements	Monitoring #		Monitoring #		Monitoring #	
	Sample Date	Results	Sample Date	Results	Sample Date	Results
Oil and Grease Sheen - No visible sheen allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
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Note – If there are any monitored results that exceed the benchmark values, you must review and revise as necessary your SWPCP within 60 days of exceeding the benchmark. SWPCP revisions must be submitted to DEQ within 14 days of completion.

Signature Requirement

I certify, under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature of Responsible Official: _____

Name and Title (Please Print): _____

Date of Signature: _____ **Telephone:** _____

NPDES 1200-Z General Permit for Storm Water Runoff

Discharge Monitoring Report

Complete report and send once a year by July 15 to:
Oregon DEQ

Legal Name:

Site/File ID #:

Common Name: SCHNITZER STEEL

County:

Facility Location:

Reporting period: July 1, _____ to June 30, ____

Twice a Year Sampling

Monitor for the following pollutants at the monitoring points specified in your Storm Water Pollution Control Plan (SWPCP). Add more sheets if you have more than three monitoring points.

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		#	#	#
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See reverse side for additional visual monitoring and signature for report.

[1]Monitoring frequency may be reduced under some circumstances – refer to page 10 of your permit. If monitoring requirements have been waived, please write in "WAIVED" for that pollutant.
[2] Separate effluent limits for these pollutants apply for coal fired power plants, cement plants, and/or roofing or asphalt paving operations.

Monthly Visual Observations

Parameter and Requirements	Monitoring #1		Monitoring #2		Monitoring #3	
	Sample Date	Results	Sample Date	Results	Sample Date	Results
Oil and Grease Sheen - No visible sheen allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
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Signature of Responsible Official: _____

Name and Title (Please Print): _____

Date of Signature: _____ **Telephone:** _____

NPDES 1200-Z General Permit for Storm Water Runoff
Discharge Monitoring Report

Complete report and send once a year by July 15 to:
Oregon DEQ

Legal Name:

Site/File ID #:

Common Name: SCHNITZER STEEL

County:

Facility Location:

Reporting period: July 1, _____ to June 30, _____

Twice a Year Sampling

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NPDES 1200-Z General Permit for Storm Water Runoff
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Common Name: SCHNITZER STEEL

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Signature of Responsible Official: _____

Name and Title (Please Print): _____

Date of Signature: _____ **Telephone:** _____

NPDES 1200-Z General Permit for Storm Water Runoff
Discharge Monitoring Report

Complete report and send once a year by July 15 to:
Oregon DEQ

Legal Name:

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Signature of Responsible Official: _____

Name and Title (Please Print): _____

Date of Signature: _____ **Telephone:** _____

SCHN00245548

CITY OF PORTLAND
ENVIRONMENTAL SERVICES
Water Pollution Control Laboratory
6543 N. Burlington Ave., Portland, Oregon 97203-5452
(503) 823-5600

June 12, 2000

Mr. Mathew Cusma
Schnitzer Steel Industries, Inc.
PO Box 10047
Portland, OR 97296-0047

Subject: Facility Storm Water Inspection

Dear Mr. Cusma:

City of Portland staff recently conducted an inspection of your facility, located at 12005 N. Burgard, for compliance with contained in its NPDES 1200-Z Storm Water Permit. Overall, the results of the inspection were satisfactory and Schnitzer Steel Industries appears to be meeting the conditions of their permit.

During the inspection, we discussed several items that your company needs to address.

1. Maintain cleaning of catch basins and catch basin filters.

2. Continue efforts to improve general site maintenance.

3. Submit your 1999-2000 storm water monitoring data to both the City and the Oregon Department of Environmental Quality (DEQ) by July 15, 2000.

Per your request, enclosed is a copy of the City's Stormwater Inspection Form.

It was a pleasure to meet you and your assistance with the inspection is appreciated. If you have any questions regarding this matter, please contact me at (503) 823-7807. Thank you.

Sincerely,

Brett Hulstrom

BRETT M. HULSTROM
Industrial Storm Water Section

BMH:bmh

Enclosure

SCHNITZER STEEL PRODUCTS CO.

P.O. Box 10047
Portland, OR 97296-0047
Phone: (503) 286-5771
(800) 888-5571
Fax: (503) 286-6948

October 6, 2003

Mr. Aaron Wieting, RG, CHMM
City of Portland
Bureau of Environmental Services
6543 N Burlington Avenue
Portland, Oregon 97203-5452

Dear Aaron,

Enclosed are revised inserts for the Schnitzer Steel Products Co. Stormwater Pollution Control Plan. These items have been revised in response to your letter dated August 13, 2003 to Jim Jakubiak, following up on our Annual Facility Stormwater Inspection.

Enclosed are the following:

Site Map: Waste material (ASR) storage and loading areas and product (scrap) receiving and unloading areas have been labeled. The area occupied by Calbag Metals has also been labeled. Stormwater monitoring occurs at the outfalls, which are identified on the map (revised Table 1 provides additional sampling details).

Table 1: The table has been expanded to identify the stormwater monitoring locations and the rationale for reducing the number of locations based on areas serving similar activities and having substantially identical effluents. Additional changes have been made to the table to reflect recent stormwater system upgrades at the Burgard site.

If you have any questions about the enclosed revisions, please do not hesitate to call me directly (503/286-6944).

Sincerely,

SCHNITZER STEEL PRODUCTS CO.

MATHEW J. CUSMA
Environmental Administrator

cc: Dennis Jurries, DEQ

GENERAL PERMIT
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
STORM WATER DISCHARGE PERMIT

Department of Environmental Quality
811 Southwest Sixth Avenue, Portland, OR 97204
Telephone: (503) 229-5279
Issued pursuant to ORS 468B.050 and The Federal Clean Water Act

ISSUED TO:

Issued 3/10/98 GEN12Z MULTNOMAH/NWR
File No. 108103 ORR60-0289

Schnitzer Steel Industries, Inc.
PO Box 10047
Portland OR 97210
Site: 12005 N Burgard Rd., Portland 97213

SOURCES COVERED BY THIS PERMIT

Facilities identified in 40 Code of Federal Regulation (CFR) §122.26(b)(14)(i -ix, xi) with storm water discharges. Construction activities, asphalt mix batch plants, concrete batch plants and Standard Industrial Classification code 14, *Mining and Quarrying of Nonmetallic Minerals, Except Fuels* are excluded from this permit. These activities are regulated under separate permits.

See Table 1: Sources Covered, pages 2-3, for more information on the CFR regulated industries covered by this permit.

Michael T. Llewelyn, Administrator
Water Quality Division

JULY 22, 1997
Date

PERMITTED ACTIVITIES

Until this permit expires or is modified or revoked, the permittee is authorized to construct, install, modify, or operate storm water treatment and/or control facilities, and to discharge storm water to public waters in conformance with all the requirements, limitations, and conditions set forth in the attached schedules as follows:

			Page
Schedule A	-	Storm Water Pollution Control Plan, Additional Requirements, Limitations, and Benchmarks	4-8
Schedule B	-	Monitoring and Reporting Requirements	9-10
Schedule C	-	Compliance Conditions and Schedules	11
Schedule D	-	Special Conditions	12
Schedule F	-	General Conditions	13

Unless authorized by another NPDES permit, all other direct and indirect discharges to public waters are prohibited.

TABLE 1: Sources Covered

Previous Permit Type	Sources Covered
1200-D	Facilities with the following primary Standard Industrial Classification codes: 21 Tobacco Products 22 Textile Mill Products 23 Apparel and Other Finished Products Made From Fabrics and Similar Material 27 Printing, Publishing and Allied Industries 4221 Farm Product Warehousing and Storage 4222 Refrigerated Warehousing and Storage 4225 General Warehousing and Storage Facilities with SIC codes 22, 23, 27, 4221, 4222, and 4225 are only required to apply for permit if storm water is exposed to material handling equipment or activities, raw materials, intermediate products, final products, waste materials, by-products, or industrial machinery.
1200-F	Facilities with primary Standard Industrial Classification code 20 Food and Kindred Products. Facilities with this SIC code are only required to apply for permit if storm water is exposed to material handling equipment or activities, raw materials, intermediate products, final products, waste materials, by-products, or industrial machinery.
1200-G	Landfills, land application sites and open dumps.
1200-H	Facilities with the following primary Standard Industrial Classification codes: 28 Chemicals and Allied Products (excluding 2874 Phosphate Fertilizer Manufacturing) 29 Petroleum Refining and Related Industries 30 Rubber and Miscellaneous Plastics Products 31 Leather and Leather Products 32 Stone, Clay, Glass, and Concrete Products 33 Primary Metal Industries and Steam Electric Power Generation including coal handling sites. Facilities with SIC codes 283, 285, 30, 31 (except 311), and 323 are only required to apply for permit if storm water is exposed to material handling equipment or activities, raw materials, intermediate products, final products, waste materials, by-products, or industrial machinery.
1200-L	Facilities with the following primary Standard Industrial Classification codes: 34 Fabricated Metal Products, Except Machinery and Transportation Equipment 35 Industrial and Commercial Machinery and Computer Equipment 36 Electronic and Other Electrical Equipment and Components, Except Computer Equipment 37 Transportation Equipment 38 Measuring, Analyzing, and Controlling Instruments; Photographic, Medical and Optical Goods; Watches and Clocks 39 Miscellaneous Manufacturing Industries Facilities with SIC codes 34 (except 3441), 35, 36, 37 (except 373), 38, and 39 are only required to apply for permit if storm water is exposed to material handling equipment or activities, raw materials, intermediate products, final products, waste materials, by-products, or industrial machinery.

TABLE 1: Sources Covered (cont.)

Previous Permit Type	Sources Covered
1200-M	Facilities with the following primary Standard Industrial Classification codes: 10 Metal Mining 12 Coal Mining 13 Oil and Gas Extraction
1200-P	Facilities with primary Standard Industrial Classification code 26 Paper and Allied Products. Facilities with SIC codes 265 and 267 are only required to apply for permit if storm water is exposed to material handling equipment or activities, raw materials, intermediate products, final products, waste materials, by-products, or industrial machinery.
1200-R	Hazardous Waste Treatment, Storage and Disposal Facilities, and facilities with primary Standard Industrial Classification codes 5015 Motor Vehicle Parts, Used, and 5093 Scrap and Waste Materials.
1200-S	Treatment works treating domestic sewage or any other sewage sludge or wastewater treatment device or system, used in the storage, recycling, and reclamation of municipal or domestic sewage (including land dedicated to the disposal of sewage sludge that are located within the confines of the facility) with the design flow capacity of 1.0 mgd or more, or required to have a pretreatment program under 40 CFR § 403.
1200-T	Facilities with the following primary Standard Industrial Classification codes that have vehicle maintenance shops (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), equipment cleaning operations, or airport deicing operations: 40 Railroad Transportation 41 Local and Suburban Transit and Interurban Highway Passenger Transportation 42 Motor Freight Transportation and Warehousing (excluding 4221 Farm Product Warehousing and Storage, 4222 Refrigerated Warehousing and Storage, and 4225 General Warehousing and Storage) 43 United States Postal Service 44 Water Transportation 45 Transportation by Air 5171 Petroleum Bulk Stations and Terminals
1200-W	Facilities with the following primary Standard Industrial Classification codes: 24 Lumber and Wood Products, Except Furniture (excluding 2491 Wood Preserving and 2411 Logging) 25 Furniture and Fixtures Facilities with SIC codes 2434 and 25 are only required to apply for permit if storm water is exposed to material handling equipment or activities, raw materials, intermediate products, final products, waste materials, by-products, or industrial machinery.

SCHEDULE A
STORM WATER POLLUTION CONTROL PLAN

1. **Preparation and Implementation of the Storm Water Pollution Control Plan (SWPCP)**
   a) The SWPCP shall be prepared by a person knowledgeable in storm water management and familiar with the facility.
   b) The SWPCP shall be signed in accordance with 40 CFR §122.22. Updates and revisions to the SWPCP shall also be signed in this manner. The SWPCP shall be signed as follows:
      i) For a Corporation - By a principal executive officer of at least the level of vice president;
      ii) For a Partnership or Sole Proprietorship - By a general partner or the proprietor, respectively; or
      iii) For a Municipality, State, Federal, or other Public Facility - By either a principal executive officer or ranking elected official.
   c) The SWPCP shall be prepared and implemented according to the time frames set forth in Schedule C.
   d) The SWPCP shall be kept current and updated as necessary to reflect any changes in facility operation.
   e) The SWPCP and updates to the SWPCP shall be submitted to the Department in accordance with Schedule B.3.
   f) A copy of the SWPCP shall be kept at the facility and made available upon request to government agencies responsible for storm water management in the permittee's area.

2. **Storm Water Pollution Control Plan Requirements**
   a) **Site Description** The SWPCP shall contain the following information:
      i) A description of the industrial activities conducted at the site. Include a description of the significant materials (see Schedule D.3, Definitions) that are stored, used, treated and/or disposed of in a manner that allows exposure to storm water. Also describe the methods of storage, usage, treatment and/or disposal.
      ii) A general location map showing the location of the site in relation to surrounding properties, transportation routes, surface waters and other relevant features.
      iii) A site map including the following:
         (1) drainage patterns
         (2) drainage and discharge structures
         (3) outline of the drainage area for each storm water outfall
         (4) paved areas and buildings within each drainage area
         (5) areas used for outdoor manufacturing, treatment, storage, and/or disposal of significant materials
         (6) existing structural control measures for reducing pollutants in storm water runoff
         (7) material loading and access areas
         (8) hazardous waste treatment, storage and disposal facilities
         (9) location of wells including waste injection wells, seepage pits, drywells, etc.
         (10) location of springs, wetlands and other surface water bodies.
      iv) Estimates of the amount of impervious surface area (including paved areas and building roofs) relative to the total area drained by each storm water outfall.
      v) For each area of the site where a reasonable potential exists for contributing pollutants to storm water runoff, identify the potential pollutants that could be present in storm water discharges.
      vi) The name(s) of the receiving water(s) for storm water drainage. If drainage is to a municipal storm sewer system, the name(s) of the ultimate receiving waters and the name of the municipality.

vii) Identification of the discharge outfall(s) and the point(s) where storm water monitoring will occur as required by Schedule B. If multiple discharge outfalls exist but will not all be monitored (as allowed in Schedule B.1.c), a description supporting this approach shall also be included.

b) **Site Controls** The permittee shall maintain existing controls and/or develop new controls appropriate for the site. The purpose of these controls is to eliminate or minimize the exposure of pollutants to storm water. In developing a control strategy, the SWPCP shall have the following minimum components. A description of each component shall be included in the SWPCP.

i) *Storm Water Best Management Practices* If technically and economically feasible, the following best management practices shall be employed at the site. A schedule for implementation of these practices shall be included in the SWPCP if the practice has not already been accomplished. This schedule must be consistent with the requirements for developing and implementing the SWPCP in Schedule C of the permit.

(1) Containment - All hazardous materials (see Schedule D.3, Definitions) shall be stored within berms or other secondary containment devices to prevent leaks and spills from contaminating storm water. If the use of berms or secondary containment devices is not possible, then hazardous materials shall be stored in areas that do not drain to the storm sewer system.

(2) Oil and Grease - Oil/Water separators, booms, skimmers or other methods shall be employed to eliminate or minimize oil and grease contamination of storm water discharges.

(3) Waste Chemicals and Material Disposal - Wastes shall be recycled or properly disposed of in a manner to eliminate or minimize exposure of pollutants to storm water. All waste contained in bins or dumpsters where there is a potential for drainage of storm water through the waste shall be covered to prevent exposure of storm water to these pollutants. Acceptable covers include, but are not limited to, storage of bins or dumpsters under roofed areas and use of lids or temporary covers such as tarps.

(4) Erosion and Sediment Control - Erosion control methods such as vegetating exposed areas, graveling or paving shall be employed to minimize erosion of soil at the site. Sediment control methods such as detention facilities, sediment control fences, vegetated filter strips, bioswales, or grassy swales shall be employed to minimize sediment loads in storm water discharges. For activities that involve land disturbance, the permittee shall contact the local municipality to determine if there are other applicable requirements.

(5) Debris Control - Screens, booms, settling ponds, or other methods shall be employed to eliminate or minimize debris in storm water discharges.

(6) Storm Water Diversion - Storm water shall be diverted away from fueling, manufacturing, treatment, storage, and disposal areas to prevent exposure of uncontaminated storm water to potential pollutants.

(7) Covering Activities - Fueling, manufacturing, treatment, storage, and disposal areas shall be covered to prevent exposure of storm water to potential pollutants. Acceptable covers include, but are not limited to, permanent structures such as roofs or buildings and temporary covers such as tarps.

(8) Housekeeping - Areas that may contribute pollutants to storm water shall be kept clean. Sweeping, prompt clean up of spills and leaks, and proper maintenance of vehicles shall be employed to eliminate or minimize exposure of storm water to pollutants.

ii) *Spill Prevention and Response Procedures* Methods to prevent spills along with clean-up and notification procedures shall be included in the SWPCP. These methods and procedures shall be made available to appropriate personnel. The required clean up material shall be on-site or readily available. Spills prevention plans required by other regulations may be substituted for this provision providing that storm water management concerns are adequately addressed.

iii) *Preventative Maintenance* A preventative maintenance program shall be implemented to ensure the effective operation of all storm water best management practices. At a minimum the program shall include:
   (1) Monthly inspections of areas where potential spills of significant materials or industrial activities could impact storm water runoff.
   (2) Monthly inspections of storm water control measures, structures, catch basins, and treatment facilities.
   (3) Cleaning, maintenance and/or repair of all materials handling and storage areas and all storm water control measures, structures, catch basins, and treatment facilities as needed upon discovery.

iv) *Employee Education* An employee orientation and education program shall be developed and maintained to inform personnel of the components and goals of the SWPCP. The program shall also address spill response procedures and the necessity of good housekeeping practices. A schedule for employee education shall be included in the SWPCP.

c) **Record Keeping and Internal Reporting Procedures** The following information shall be recorded and maintained at the facility and provided to the Department and other government agencies upon request. This information does not need to be submitted as part of the SWPCP.
   i) Inspection, maintenance, repair and education activities as required by the SWPCP.
   ii) Spills or leaks of significant materials that impacted or had the potential to impact storm water or surface waters. Include the corrective actions to clean up the spill or leak as well as measures to prevent future problems of the same nature.

ADDITIONAL REQUIREMENTS

3. **Oregon Administrative Rule (OAR) 340-44-50, Waste Disposal Wells for Surface Drainage** OAR 340-44-50 requires that waste disposal wells for storm drainage only be used in those areas where there is an adequate confinement barrier or filtration medium between the well and an underground source of drinking water; and where construction of surface discharging storm sewers is not practical. In addition, this rule requires the following:
   a) New storm drainage disposal wells shall be as shallow as possible but shall not exceed a depth of 100 feet.
   b) Disposal wells shall be located at least 500 feet from domestic water wells.
   c) Using a disposal well for agricultural drainage is prohibited.
   d) Using a disposal well for surface drainage in areas where toxic chemicals or petroleum products are stored or handled is prohibited unless there is containment around the product area which will prevent spills and leaks from entering the well.
   e) Any owner or operator of the disposal well shall have available a means of temporarily plugging or blocking the well in the event of an accident of spill.
   f) Any area that is drained by a disposal well shall be kept clean of petroleum products and other organic or chemical wastes as much as practicable to minimize the degree of contamination of the storm water drainage.

4. **Oregon Administrative Rule 340-41-26(3)(a)(D), Surface Water Temperature Management Plan** Individual storm water discharges are not expected to cause a measurable increase in stream temperature. Compliance with this permit meets the requirement of OAR 340-41-26(3)(a)(D) to develop and implement a surface water temperature management plan. If it is determined that storm discharges in a particular basin are impacting a Total Maximum Daily Load for temperature, then permittees in this basin will be required to implement additional management practices to reduce the temperature of the discharges. These practices include, but are not limited to, increased vegetation to provide for shading, underground conveyance systems or detention vaults, and filter treatment systems to reduce detention times.

5. **Storm Water Only** This permit only regulates the discharge of storm water. It does not authorize the discharge or on-site disposal of process wastewater, wash water, boiler blowdown, cooling water, air conditioning condensate, deicing residues, or any other non-storm discharges associated with the facility.

   Any other wastewater discharge or disposal must be permitted in a separate permit. A separate Department permit may not be required if the wastewater is reused or recycled without discharge or disposal, or discharged to the sanitary sewer with approval from the local sanitary authority.

6. **Specific River Basin Requirements** The permittee shall comply with any Oregon Administrative Rule requirements for storm water management specific to the applicable river basin.

7. **Water Quality Standards** The ultimate goal for permittees is to comply with water quality standards in OAR 340-41. In instances where a storm water discharge adversely impacts water quality, the Department may require the facility to implement additional management practices, apply for an individual permit, or take other appropriate action.

CODE OF FEDERAL REGULATION STORM WATER DISCHARGE LIMITATIONS

8. The permittee with the following activities shall be in compliance with the applicable limitations at the time of permit assignment:

CFR Industry Category	Parameter	Limitation	
Cement manufacturing facilities for runoff from material storage piles (40 CFR §411)	pH Total Suspended Solids (TSS)	6.0 - 9.0 SU 50 mg/l	
Steam powered electric power generation facilities with coal handling and storage facilities (40 CFR §423)	TSS	50 mg/l, Daily Maximum	
Manufacturing of asphalt paving and roofing emulsions (40 CFR §443)	Oil & Grease	20 mg/l, Daily Maximum	15 mg/l, 30 Day Average
	pH	6.0 - 9.0 SU	

STORM WATER DISCHARGE BENCHMARKS

9. **Benchmarks** Benchmarks are guideline concentrations not limitations. They are designed to assist the permittee in determining if the implementation of their SWPCP is reducing pollutant concentrations to below levels of concern. For facilities that are subject to federal limitations, benchmarks apply to only those pollutants that are not limited by the federal regulations. The following benchmarks apply to each point source discharge of storm water associated with industrial activity:

Parameter	Benchmark
Total Copper	0.1 mg/l
Total Lead	0.4 mg/l
Total Zinc	0.6 mg/l
pH	5.5 - 9 S.U.
Total Suspended Solids	130 mg/l
Oil & Grease	10 mg/l
** E. coli	406 counts/100 ml
Floating Solids (associated with industrial activities)	No Visible Discharge
Oil & Grease Sheen	No Visible Sheen

** The benchmark for E. coli applies only to landfills, if septage and sewage biosolids are disposed at the site, and sewage treatment plants.

10. **Review of SWPCP** If benchmarks are not achieved, the permittee shall review their SWPCP within 60 days of receiving sampling results. The purpose of this review is to determine if the SWPCP is being followed and to identify any additional technically and economically feasible site controls that need to be implemented to further improve the quality of storm water discharges. These site controls include best management practices, spill prevention and response procedures, preventative maintenance, and employee education procedures as described in Schedule A.2.b.

    a) **SWPCP Revision** Any newly identified site controls shall be implemented in a timely manner and incorporated into the SWPCP as an update. A new SWPCP is not required. If no additional site controls are identified, the permittee shall state as such in an update to the SWPCP.

    b) **SWPCP Revision Submittal** Results of this review shall be submitted to the Department in accordance with Schedule B.3 and made available upon request to government agencies responsible for storm water management in the permittee's area.

    c) **Background or Natural Conditions** If the permittee demonstrates that background or natural conditions not associated with industrial activities at the site cause an exceedance of a benchmark, then no further modifications to the SWPCP are required for that parameter. Upon successful demonstration of natural or background conditions through monitoring of the same storm event used to evaluate benchmarks the permittee would be eligible for the monitoring reduction as outlined in Schedule B.2.

SCHEDULE B
MONITORING AND REPORTING REQUIREMENTS

1. **Minimum Monitoring Requirements**

a) All permittees shall monitor storm water associated with industrial activity for the following:

GRAB SAMPLES OF STORM WATER	
Parameter	Frequency
Total Copper	Twice per Year
Total Lead	Twice per Year
Total Zinc	Twice per Year
pH	Twice per Year
Total Suspended Solids	Twice per Year
Oil & Grease	Twice per Year
**E. coli	Twice per Year

**The monitoring for E.coli applies only to landfills, if septage and sewage biosolids are disposed at the site, and sewage treatment plants.

VISUAL MONITORING OF STORM WATER	
Parameter	Frequency
Floating Solids (associated with industrial activities)	Once a Month (when discharging)
Oil & Grease Sheen	Once a Month (when discharging)

b) **Grab Samples** Grab samples that are representative of the discharge shall be taken at least 60 days apart. It is preferred, but not required, that one sample be collected in the fall and one in the spring. Compositing of samples from different drainage areas is not allowed.

c) **Multiple Point Source Discharges** The permittee may reduce the number of storm water monitoring points provided the outfalls have substantially identical effluents. Substantially identical effluents are discharges from drainage areas serving similar activities where the discharges are expected to be similar in composition. Outfalls serving areas with no exposure of storm water to industrial activities are not required to be monitored.

d) **Monitoring Location** All samples shall be taken at monitoring points specified in the SWPCP before the storm water joins or is diluted by any other wastestream, body of water or substance.

e) **No Exposure** If there is no exposure of storm water to material handling equipment or activities, raw materials, intermediate products, final products, waste materials, by-products, or industrial machinery at the site, monitoring is not required. The permittee shall submit an annual statement certifying as such in lieu of monitoring (refer to Schedule B.3.b). If exposure cannot be prevented, the permittee shall comply with Schedule B.

2. **Monitoring Reduction**
   a) **Visual Observations** There is no reduction allowed of the required visual observations.

   b) **Grab Samples** The permittee is not required to conduct sampling if the benchmarks specified in Schedule A.9 are met, or if the exceedance is due to natural or background conditions for at least four consecutive storm water monitoring events over 24 continuous months. Note that there is no reduction in monitoring allowed for facilities subject to limitations under CFR (Schedule A.8).
      i) Results from sampling events cannot be averaged to meet the benchmarks.
      ii) Monitoring waivers may be allowed for individual parameters.
      iii) Parameters in exceedance or not previously sampled shall be monitored as required in Schedule B.1 until the monitoring waiver condition above is met.
      iv) Monitoring data from the previous permit period may be used to meet the waiver requirement. This data shall be evaluated against the benchmarks specified in this permit.
      v) Monitoring data from the same storm event shall be used to demonstrate that background or natural conditions not associated with industrial activities at the site are contributing to the exceedance of a benchmark.
      vi) The permittee shall submit written notification to the Department when exercising the monitoring waiver condition (refer to Schedule B.3.c).

   c) **Reinstatement of Monitoring Requirements**
      i) The permittee shall conduct monitoring as specified in Schedule B.1 if changes to site conditions are expected to impact storm water discharge characteristics.
      ii) The Department may reinstate monitoring requirements as specified in Schedule B.1 if prior monitoring efforts were improper or results were incorrect.
      iii) Monitoring may also be reinstated if future sampling efforts indicate benchmarks are being exceeded.

3. **Reporting Requirements** The permittee shall submit the following to the appropriate DEQ regional office:
   a) **Monitoring Data** The permittee shall submit by July 15 of each year grab sampling and visual monitoring data for the previous monitoring period (July 1- June 30). If there was insufficient rainfall to collect samples, the permittee shall notify the Department by July 15 of each year.

   b) **No Exposure Certification** The permittee shall submit an annual certification by July 15 of each year if monitoring is not required due to no exposure of storm water to industrial activities. The certification shall state that site conditions have been evaluated and the facility meets the requirements of Schedule B.1.e.

   c) **Monitoring Reduction Notification** The permittee shall submit written notification when exercising the monitoring reduction condition in Schedule B.2.b.

   d) **SWPCP Update/Completion** The permittee shall prepare or update the SWPCP in accordance with Schedule C of the permit. The permittee shall submit an updated or completed SWPCP within 14 days after completion.

   e) **SWPCP Revision** The permittee shall submit any revisions to the SWPCP required by Schedule A.10 within 14 days after the SWPCP is revised. If the Department does not review and comment on the revised SWPCP within 30 days, the permittee shall implement the revisions as proposed.

SCHEDULE C
COMPLIANCE CONDITIONS AND SCHEDULES

1. **Existing Permittee** (for a facility with an NPDES storm water discharge permit assigned prior to September 30, 1996):

   a) Not later than 90 days after receiving this permit, the existing permittee shall revise and begin implementation of their SWPCP to meet any new permit requirements.

   b) Except for site controls that require capital improvements (see Schedule D.3, Definitions), the SWPCP shall be implemented within 90 days after revision of SWPCP. Site control activities that require capital improvements shall be completed in accordance with the schedule set forth in the SWPCP.

2. **New Permittee with Existing Facility** (for a facility operating prior to September 30, 1996, without an NPDES storm water discharge permit):

   a) Not later than 90 days after receiving this permit, the new permittee shall prepare and begin implementation of their SWPCP.

   b) Except for site controls that require capital improvements (see Schedule D.3, Definitions), the SWPCP shall be implemented within 90 days after completion of SWPCP. Site control activities that require capital improvements shall be completed in accordance with the schedule set forth in the SWPCP.

3. **New Facility** (for a facility beginning operation after September 30, 1996):

   a) Prior to starting operations, a new facility shall prepare and begin implementation of their SWPCP.

   b) Except for site controls that require capital improvements (see Schedule D.3, Definitions), the SWPCP shall be implemented within 90 days after beginning operation. Site control activities that require capital improvements shall be completed in accordance with the schedule set forth in the SWPCP.

4. **New Permittee Discharging to Clackamas River, McKenzie River above Hayden Bridge (River Mile 15) or North Santiam River.** Not later than 180 days after receiving this permit, new permittees discharging to Clackamas River, McKenzie River above Hayden Bridge (river mile 15) or North Santiam River shall submit to the Department a monitoring and water quality evaluation program. This program shall be effective in evaluating the in-stream impacts of the discharge as required by OAR 340-41-470. Within 30 days after Department approval, the permittee shall implement the monitoring and water quality evaluation program. New permittees are defined to include potential or existing dischargers that did not have a permit, and existing dischargers that have a permit but request an increased load limitation.

SCHEDULE D
SPECIAL CONDITIONS

1. **Releases in Excess of Reportable Quantities.** This permit does not relieve the permittee of the reporting requirements of 40 CFR §117 Determination of Reportable Quantities for Hazardous Substances and 40 CFR §302 Designation, Reportable Quantities, and Notification.

2. **Availability of SWPCP and Monitoring Data.** The Storm Water Pollution Control Plan and/or storm water monitoring data shall be made available to government agencies responsible for storm water management in the permittee's area.

3. **Definitions**

   a) *Capital Improvements* means the following improvements that require capital expenditures:
      i) Treatment best management practices including but not limited to settling basins, oil/water separation equipment, catch basins, grassy swales, and detention/retention basins.
      ii) Manufacturing modifications that incur capital expenditures, including process changes for reduction of pollutants or wastes at the source.
      iii) Concrete pads, dikes and conveyance or pumping systems utilized for collection and transfer of storm water to treatment systems.
      iv) Roofs and appropriate covers for manufacturing areas.

   b) *Hazardous Materials* as defined in 40 CFR §302 Designation, Reportable Quantities, and Notification.

   c) *Material Handling Activities* include the storage, loading and unloading, transportation or conveyance of raw material, intermediate product, finished product, by-product or waste product.

   d) *Point Source* means a discharge from any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, or conduit.

   e) *Significant Materials* includes, but is not limited to: raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under section 101(14) of CERCLA; any chemical that a facility is required to report pursuant to section 313 of title III of SARA; fertilizers; pesticides; and waste products such as ash, slag, and sludge that have the potential to be released with storm water discharges.

SCHEDULE F
NPDES GENERAL CONDITIONS

SECTION A. STANDARD CONDITIONS

1. Duty to Comply

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of Oregon Revised Statutes (ORS) 468B.025 and is grounds for enforcement action; for permit termination, suspension, or modification; or for denial of a permit renewal application.

2. Penalties for Water Pollution and Permit Condition Violations

Oregon Law (ORS 468.140) allows the Director to impose civil penalties up to $10,000 per day for violation of a term, condition, or requirement of a permit.

Under ORS 468.943, unlawful water pollution, if committed by a person with criminal negligence, is punishable by a fine of up to $25,000 or by imprisonment for not more than one year, or by both. Each day on which a violation occurs or continues is a separately punishable offense.

Under ORS 468.946, a person who knowingly discharges, places or causes to be placed any waste into the waters of the state or in a location where the waste is likely to escape into the waters of the state, is subject to a Class B felony punishable by a fine not to exceed $200,000 and up to 10 years in prison.

3. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment. In addition, upon request of the Department, the permittee shall correct any adverse impact on the environment or human health resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

4. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and have the permit renewed. The application shall be submitted at least 180 days before the expiration date of this permit.

The Director may grant permission to submit an application less than 180 days in advance but no later than the permit expiration date.

5. Permit Actions

This permit may be modified, suspended, revoked and reissued, or terminated for cause including, but not limited to, the following:

a. Violation of any term, condition, or requirement of this permit, a rule, or a statute;
b. Obtaining this permit by misrepresentation or failure to disclose fully all material facts; or
c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

The filing of a request by the permittee for a permit modification or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

6. Toxic Pollutants

The permittee shall comply with any applicable effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants within the time provided in the regulations that establish those standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

7. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

8. Permit References

Except for effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants and standards for sewage sludge use or disposal established under Section 405(d) of the Clean Water Act, all rules and statutes referred to in this permit are those in effect on the date this permit is issued.

SECTION B. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls, and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

2. Duty to Halt or Reduce Activity

For industrial or commercial facilities, upon reduction, loss, or failure of the treatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control production or all discharges or both until the facility is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment facility fails or is reduced or lost. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Bypass of Treatment Facilities

a. Definitions
   (1) "Bypass" means intentional diversion of waste streams from any portion of the treatment facility. The term "bypass" does not include nonuse of singular or multiple units or processes of a treatment works when the nonuse is insignificant to the quality and/or quantity of the effluent produced by the treatment works. The term "bypass" does not apply if the diversion does not cause effluent limitations to be exceeded, provided the diversion is to allow essential maintenance to assure efficient operation.
   (2) "Severe property damage" means substantial physical damage to property, damage to the treatment facilities or treatment processes which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

b. Prohibition of bypass.
   (1) Bypass is prohibited unless:
      (a) Bypass was necessary to prevent loss of life, personal injury, or severe property damage;
      (b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and
      (c) The permittee submitted notices and requests as required under General Condition B.3.c.
   (2) The Director may approve an anticipated bypass, after considering its adverse effects and any alternatives to bypassing, when the Director determines that it will meet the three conditions listed above in General Condition B.3.b.(1).

c. Notice and request for bypass.
   (1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior written notice, if possible at least ten days before the date of the bypass.
   (2) Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in General Condition D.5.

4. Upset

a. Definition. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operation error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventative maintenance, or careless or improper operation.

b. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of General Condition B.4.c are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

c. Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
   (1) An upset occurred and that the permittee can identify the causes(s) of the upset;
   (2) The permitted facility was at the time being properly operated;
   (3) The permittee submitted notice of the upset as required in General Condition D.5, hereof (24-hour notice); and
   (4) The permittee complied with any remedial measures required under General Condition A.3 hereof.

d. Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

5. Treatment of Single Operational Event

For purposes of this permit, A Single Operational Event which leads to simultaneous violations of more than one pollutant parameter shall be treated as a single violation. A single operational event is an exceptional incident which causes simultaneous, unintentional, unknowing (not the result of a knowing act or omission), temporary noncompliance with more than one Clean Water Act effluent discharge pollutant parameter. A single operational event does not include Clean Water Act violations involving discharge without a NPDES permit or noncompliance to the extent caused by improperly designed or inadequate treatment facilities. Each day of a single operational event is a violation.

6. Overflows from Wastewater Conveyance Systems and Associated Pump Stations

a. Definitions
   (1) "Overflow" means the diversion and discharge of waste streams from any portion of the wastewater conveyance system including pump stations, through a designed overflow device or structure, other than discharges to the wastewater treatment facility.
   (2) "Severe property damage" means substantial physical damage to property, damage to the conveyance system or pump station which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of an overflow.
   (3) "Uncontrolled overflow" means the diversion of waste streams other than through a designed overflow device or structure, for example to overflowing manholes or overflowing into residences, commercial establishments, or industries that may be connected to a conveyance system.

b. Prohibition of overflows. Overflows are prohibited unless:
   (1) Overflows were unavoidable to prevent an uncontrolled overflow, loss of life, personal injury, or severe property damage;
   (2) There were no feasible alternatives to the overflows, such as the use of auxiliary pumping or conveyance systems, or maximization of conveyance system storage; and
   (3) The overflows are the result of an upset as defined in General Condition B.4. and meeting all requirements of this condition.

c. Uncontrolled overflows are prohibited where wastewater is likely to escape or be carried into the waters of the State by any means.

d. Reporting required. Unless otherwise specified in writing by the Department, all overflows and uncontrolled overflows must be reported orally to the Department within 24 hours from the time the permittee becomes aware of the overflow. Reporting procedures are described in more detail in General Condition D.5.

7. Public Notification of Effluent Violation or Overflow

If effluent limitations specified in this permit are exceeded or an overflow occurs, upon request by the Department, the permittee shall take such steps as are necessary to alert the public about the extent and nature of the discharge. Such steps may include, but are not limited to, posting of the river at access points and other places, news releases, and paid announcements on radio and television.

8. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in such a manner as to prevent any pollutant from such materials from entering public waters, causing nuisance conditions, or creating a public health hazard.

SECTION C. MONITORING AND RECORDS

1. Representative Sampling

Sampling and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring points specified in this permit and shall be taken, unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body of water, or substance. Monitoring points shall not be changed without notification to and the approval of the Director.

2. Flow Measurements

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than $\pm$ 10 percent from true discharge rates throughout the range of expected discharge volumes.

3. Monitoring Procedures

Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit.

4. Penalties of Tampering

The Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate, any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than two years, or by both. If a conviction of a person is for a violation committed after a first conviction of such person, punishment is a fine not more than $20,000 per day of violation, or by imprisonment of not more than four years or both.

5. Reporting of Monitoring Results

Monitoring results shall be summarized each month on a Discharge Monitoring Report form approved by the Department. The reports shall be submitted monthly and are to be mailed, delivered or otherwise transmitted by the 15th day of the following month unless specifically approved otherwise in Schedule B of this permit.

6. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR 136 or as specified in this permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the Discharge Monitoring Report. Such increased frequency shall also be indicated. For a pollutant parameter that may be sampled more than once per day (e.g., Total Chlorine Residual), only the average daily value shall be recorded unless otherwise specified in this permit.

7. Averaging of Measurements

Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean, except for bacteria which shall be averaged as specified in this permit.

8. Retention of Records

Except for records of monitoring information required by this permit related to the permittee's sewage sludge use and disposal activities, which shall be retained for a period of at least five years (or longer as required by 40 CFR part 503), the permittee shall retain records of all monitoring information, including all calibration and maintenance records of all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report or application. This period may be extended by request of the Director at any time.

9. Records Contents

Records of monitoring information shall include:
a. The date, exact place, time and methods of sampling or measurements;
b. The individual(s) who performed the sampling or measurements;
c. The date(s) analyses were performed;
d. The individual(s) who performed the analyses;
e. The analytical techniques or methods used; and
f. The results of such analyses.

10. Inspection and Entry

The permittee shall allow the Director, or an authorized representative upon the presentation of credentials to:

a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit, and
d. Sample or monitor at reasonable times, for the purpose of assuring permit compliance or as otherwise authorized by state law, any substances or parameters at any location.

SECTION D. REPORTING REQUIREMENTS

1. Planned Changes

The permittee shall comply with Oregon Administrative Rules (OAR) 340, Division 52, "Review of Plans and Specifications". Except where exempted under OAR 340-52, no construction, installation, or modification involving disposal systems, treatment works, sewerage systems, or common sewers shall be commenced until the plans and specifications are submitted to and approved by the Department. The permittee shall give notice to the Department as soon as possible of any planned physical alternations or additions to the permitted facility.

2. Anticipated Noncompliance

The permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

3. Transfers

This permit may be transferred to a new permittee provided the transferee acquires a property interest in the permitted activity and agrees in writing to fully comply with all the terms and conditions of the permit and the rules of the Commission. No permit shall be transferred to a third party without prior written approval from the Director. The permittee shall notify the Department when a transfer of property interest takes place.

4. Compliance Schedule

Reports of compliance or noncompliance with, or any progress reports on interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date. Any reports of noncompliance shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirements.

5. Twenty-Four Hour Reporting

The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally (by telephone) within 24 hours, unless otherwise specified in this permit, from the time the permittee becomes aware of the circumstances. During normal business hours, the Department's Regional office shall be called. Outside of normal business hours, the Department shall be contacted at 1-800-452-0311 (Oregon Emergency Response System).

A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. If the permittee is establishing an affirmative defense of upset or bypass to any offense under ORS 468.922 to 468.946, and in which case if the original reporting notice was oral, delivered written notice must be made to the Department or other agency with regulatory jurisdiction within 4 (four) calendar days. The written submission shall contain:

a. A description of the noncompliance and its cause;
b. The period of noncompliance, including exact dates and times;
c. The estimated time noncompliance is expected to continue if it has not been corrected;
d. Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance; and
e. Public notification steps taken, pursuant to General Condition B.7.

The following shall be included as information which must be reported within 24 hours under this paragraph:

a. Any unanticipated bypass which exceeds any effluent limitation in this permit.
b. Any upset which exceeds any effluent limitation in this permit.
c. Violation of maximum daily discharge limitation for any of the pollutants listed by the Director in this permit.

The Department may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

6. Other Noncompliance

The permittee shall report all instances of noncompliance not reported under General Condition D.4 or D.5, at the time monitoring reports are submitted. The reports shall contain:

a. A description of the noncompliance and its cause;
b. The period of noncompliance, including exact dates and times;
c. The estimated time noncompliance is expected to continue if it has not been corrected; and
d. Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

7. Duty to Provide Information

The permittee shall furnish to the Department, within a reasonable time, any information which the Department may request to determine compliance with this permit. The permittee shall also furnish to the Department, upon request, copies of records required to be kept by this permit.

Other Information: When the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or any report to the Department, it shall promptly submit such facts or information.

8. Signatory Requirements

All applications, reports or information submitted to the Department shall be signed and certified in accordance with 40 CFR 122.22.

9. Falsification of Reports

Under ORS 468.953, any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance, is subject to a Class C felony punishable by a fine not to exceed $100,000 per violation and up to 5 years in prison.

10. Changes to Indirect Dischargers - **[Applicable to Publicly Owned Treatment Works (POTW) only]**

The permittee must provide adequate notice to the Department of the following:

a. Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to section 301 or 306 of the Clean Water Act if it were directly discharging those pollutants and;

b. Any substantial change in the volume or character of pollutants being introduced into the POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.

c. For the purposes of this paragraph, adequate notice shall include information on (i) the quality and quantity of effluent introduced into the POTW, and (ii) any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

11. Changes to Discharges of Toxic Pollutant - [Applicable to existing manufacturing, commercial, mining, and silvicultural dischargers only]

The permittee must notify the Department as soon as they know or have reason to believe of the following:

a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:
   (1) One hundred micrograms per liter (100 µg/l);
   (2) Two hundred micrograms per liter (200 µg/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 µg/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;
   (3) Five (5) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR 122.21(g)(7); or
   (4) The level established by the Department in accordance with 40 CFR 122.44(f).

b. That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":
   (1) Five hundred micrograms per liter (500 µg/l);
   (2) One milligram per liter (1 mg/l) for antimony;
   (3) Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR 122.21(g)(7); or
   (4) The level established by the Department in accordance with 40 CFR 122.44(f).

SECTION E. DEFINITIONS

1. BOD means five-day biochemical oxygen demand.
2. TSS means total suspended solids.
3. mg/l means milligrams per liter.
4. kg means kilograms.
5. m^3/d means cubic meters per day.
6. MGD means million gallons per day.
7. Composite sample means a sample formed by collecting and mixing discrete samples taken periodically and based on time or flow.
8. FC means fecal coliform bacteria.
9. Technology based permit effluent limitations means technology-based treatment requirements as defined in 40 CFR 125.3, and concentration and mass load effluent limitations that are based on minimum design criteria specified in OAR 340-41.
10. CBOD means five day carbonaceous biochemical oxygen demand.
11. Grab sample means an individual discrete sample collected over a period of time not to exceed 15 minutes.
12. Quarter means January through March, April through June, July through September, or October through December.
13. Month means calendar month.
14. Week means a calendar week of Sunday through Saturday.
15. Total residual chlorine means combined chlorine forms plus free residual chlorine.
16. The term "bacteria" includes but is not limited to fecal coliform bacteria, total coliform bacteria, and E. coli bacteria.
17. POTW means a publicly owned treatment works.

State of Oregon
Department of Environmental Quality — Memorandum

Date: April 16, 1997

To: Stephanie Hallock, Acting Water Quality Administrator

From: Rajeev Kapur, Water Quality Division

Subject: Summary of Written Comments Received on the Proposed Renewal of the General Storm Water Permits (1200-A & 1200-Z)

The following is a summary of written comments received during the public comment period on the proposed renewal of the general storm water permits referenced above. Public hearings were held in Portland, Eugene, Pendleton and Bend on March 12, 1997. Comments received by the April 7, 1997 due date are summarized below. The oral testimony provided at the hearings are summarized in the Presiding Officer's Reports.

SUMMARY OF COMMENTS

1. **Jon T. Haydon, Biomass One, L.P.**
   2350 Avenue 'G', White City, OR 97503
   Biomass One provided comments on the proposed 1200-Z general permit. They agree with the removal of the PE signatory requirement for preparation of the Storm Water Pollution Control Plan (SWPCP). They also agree with the option to demonstrate that background or natural conditions do contribute Total Suspended Solids (TSS) and oil residue in storm water. Biomass requested a clarification as to whether the best management practices (BMPs) are "required" or "required if applicable". Visual monitoring should be required only during months where at least one storm event produces runoff.

2. (b) (6) [redacted]., Portland, OR 97231
   The Department should require the submittal of the SWPCPs. This will make the plans readily available to the public and will enable the general public to get more involved in the storm water program. Background levels should not be used to further degrade state waters. Benchmarks without enforceable limits will degrade water quality and providing monitoring waivers is risky.

3. **Timothy R. Todd, Schnitzer Steel Products Co.**
   P. O. Box 10047, Portland, OR 97296-0047
   Schnitzer Steel provided comments on the 1200-Z permit. The permit should provide additional flexibility such as that provided in EPA's multi-sector permit. EPA's multi-sector permit does not require analytical monitoring. Analytical monitoring does not provide meaningful information regarding the quality of the storm water discharged. Instead resources should be directed at implementing BMPs. If monitoring is required, a single indicator pollutant should be used. Use of benchmarks concentrations to establish a basis for further monitoring is beyond the scope of this permit. Thus, benchmarks are not significantly different than effluent limits. They impose high

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costs and provide little benefit compared to implementation of BMPs. Under the proposed permit, steel recycling facilities may be required to cover portions of their operations. EPA's permit states that such covers are inappropriate. The proposed permit should be modified to allow non-storm water discharges such as those allowed in EPA's permit (lawn irrigation, water from springs, clean ground water, etc.).

The permit requirement to maintain a record of spills and leaks for three years is beyond the scope of existing state and federal requirements. Since a list of reportable quantities of hazardous substances is required by rule, this requirement is not necessary. The permit requires secondary containment of hazardous substances; this requirement may be interpreted to include scrap iron and steel. The permit should be modified to specify that secondary containment is required for storage of hazardous waste or other narrowly defined hazardous materials.

4. (b) (6)
[redacted]., Portland, OR 97231
Public outreach programs should be developed to get citizen groups more involved in storm water issues. The Department should consider forming a citizen advisory committee to review policy, management practices, and technological changes. SWPCPs should be submitted to the Department. This will provide public access to these plans and will enable the general public to get more involved in the storm water program. The permit should continue to require compliance with specific river basin rules and should retain the prohibition to prevent the discharge of toxic pollutants in toxic amounts. The permit should also include annual allowable quantities of pollutants that can be discharged by a facility. These values can be established by using site specific mixing zone calculations. The permit should be revised to include limits for oil & grease, temperature, turbidity and TSS. The monitoring waiver should be removed because site conditions can change, which can result in vastly different discharge characteristics.

5. **E. Callison, Director, West Multnomah Soil and Water Conservation District Board**
2115 SE Morrison St., Portland, OR 97214
Poorly managed surface runoff causes structural damage in streams and is also a major source of toxic pollutants. The Department should consider overhauling these permits in light of Northwest Environmental Advocates' (NEA) comments.

6. **Allen H. Throop, Department of Geology and Mineral Industries (DOGAMI)**
Pacific Blvd. SE, Albany, OR 97321
The annual permit year should end on June 30 with reports to be submitted within the next fifteen (15 days). This will allow the 1200-A permit renewals to coincide with the renewal of our permit for a site.

7. **John La Riviere, Abiqua Engineering, Inc.**
912 12th Street SE, Salem, OR 97302

The permit does not state what defines whether a person is knowledgeable in storm water management. Bioswales are an effective method for treating storm water and should be included as a specific BMP. The 30-day average limit for oil & grease Asphalt Paving and Roofing Emulsion Manufacturers is meaningless if samples are collected 60 days apart. Metals monitoring has been included for some sources that did not previously have them. What is the basis for this and does the Department have supporting data to require this? The requirement to re-evaluate BMPs based on

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one data point is unreasonable. Failure to meet benchmarks could be the result of many factors, and is not necessarily an indicator that the SWPCP is inadequate.

Debris benchmark - how do you determine compliance with this? If previous monitoring indicates that the site has met benchmarks, can the monitoring waiver be implemented? If some parameters meet benchmarks, can the monitoring waiver be implemented for those parameters? Permittees should summarize visual monitoring data on annual reports but keep written observations on file. Storm water monitoring should be kept on a water year basis rather than a calendar year because it is easy to interpret data and variations between fall and winter sampling events.

8. (b) (6) [redacted], **Port of Portland**
P. O. Box 3529, Portland, OR 97208
The Port supports the change in the PE signatory requirements. Preventative maintenance activities are labor intensive and should be required only during the wet season. However, at some facilities, monthly inspections of catch basins are not possible. In these situations, an annual inspection of control measures prior to the onset of the wet season is adequate when coupled with the visual monthly monitoring requirement. The signatory requirements will help improve SWPCP implementation by getting "buy off" and understanding from management.

The federal regulations allow non-storm water discharges such as air-conditioning condensate. The storm water only requirement in the proposed permits is in direct conflict with federal storm water regulations. The Port supports the benchmark concept and believes that the values are reasonable. The Port also supports the monitoring waiver which will enable resources to be directed to other storm water issues. The proposed permit should clarify whether the annual report includes visual monitoring observations. The permit does not require flow measurement, however, the general conditions contain a provision that deals with this topic. This provision should be eliminated.

9. **Paul Slyman, DEQ**
811 SW Sixth Ave., Portland, OR 97204
Composters are concerned with site controls aspect of the BMPs. They are concerned how these BMPs are to be applied in large acreage composting operations. Specifically, composters are concerned with the BMPs that require diversion structures and roofing/cover.

10. **Jack Hoeck, Rexius Forest By-Products, Inc.**
750 Chambers Street, Eugene, OR 97402
Mr. Hoeck is concerned about the site controls aspect of the BMPs. The proposed language states that certain areas shall be covered or storm water shall be diverted from areas, etc. The latitude that available in the existing permit (wherever possible, practicable) is no longer allowed in the proposed permit. The only latitude allowed in the proposed permit is in the introductory portion of the site controls section which has the phrase, "if appropriate given site specific conditions". This language is ambiguous and the language in the existing permit should be retained.

11. **Jennifer L. Bushman, Port of Portland**
P. O. Box 3529, Portland, OR 97208
The Port supports the change in the PE signatory requirements. Preventative maintenance activities are labor intensive and should be required only during the wet season. However, at some facilities, monthly inspections of catch basins are not possible. In these situations, an annual inspection of control measures prior to the onset of the wet season is adequate when coupled with the visual

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monthly monitoring requirement. The signatory requirements will help improve SWPCP implementation by getting understanding and commitment from management.

The federal regulations allow non-storm water discharges such as air-conditioning condensate. The storm water only requirement in the proposed permits is in direct conflict with federal storm water regulations. The Port supports the benchmark concept and believes that the values are reasonable. The Port also supports the monitoring waiver which will enable resources to be directed to other storm water issues. The proposed permit should clarify whether the annual report requires the submittal of visual monitoring observations. The permit does not require flow measurement, however, the general conditions contain a provision that deals with this topic. This provision should be eliminated.

12. **Brian Dalton, Dalton Rock**
P. O. Box 27, Dallas, OR 97338
The sampling requirement for copper, lead and zinc is not related to demonstrated problems at these facilities and impose an unnecessary burden on our operation.

13. **Laurence Tuttle, Center of Environmental Equity**
610 SW Alder, Suite 1021, Portland, OR 97205
Language should be included in the proposed 1200-Z permit which would require information regarding the applicant, its affiliates and subsidiaries for metal mining operations. The Department should not begin processing permits unless an applicant verifies that they, their affiliates, or their subsidiaries are not in violation of permits, orders and other requirements. EPA and other state agencies have interpreted 40 CFR 440.130 to mean that mining facilities are designed to a 10-year, 24 hour precipitation event. These facilities are held harmless for all subsequent discharges through the storm water system. Such a loophole is an incentive to discharge industrial waste through the storm water system.

14. **Albert Guenther, Oak Lodge Sanitary District**
14611 SE River Road, Milwaukie, OR 97267-1198
Inspections should be reduced to semi-annually; inspection of these areas during the dry weather months isn't necessary. The permit is silent on how exceedances due to background or natural conditions are to be demonstrated. This could lead to a continual update of the SWPCP.

15. **Frank Fleck, Pennzoil Products Company**
440 N. Columbia Blvd., Portland, OR 97217-1094
Pennzoil supports the combining of the general storm water permits, the reduction in the number of pollutants to be monitored, and the option for reduced monitoring. The permit needs to be clarified to state how benchmarks will be enforced. The permit does not state what would be considered background or natural sources of pollutants. This information and the details of the demonstration process itself should be added to the permit. The permit should be revised to include a provision that states that no additional BMPs are needed where a facility exceeds one or more of the benchmarks but finds that additional control measures are not technically or economically feasible. The proposed storm water permit prepared by the State of California includes such language. EPA has elected not to establish storm water effluent limits for facilities in our industrial category (SIC 2992). DEQ should either reconsider establishing effluent limits or benchmarks that are more stringent than the

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federal rules or provide an explanation why more stringent standards are necessary. The benchmark for zinc should be 0.6 mg/l not 0.5 mg/l.

16. **Gareth S. Ott, City of Gresham**
1333 NW Eastman Pkwy, Gresham, OR 97030-3813
Under "containment" in Schedule A, the term "hazardous substances" is used; however, the definition in Schedule D uses the term "hazardous materials". To meet the debris benchmark, storm water screening would be necessary. This will be costly and maintenance intensive. The BMPs under "storm water diversion" and "covering activities" structures would require the City to install roofs over existing fueling facilities and modify drainage to comply with these BMPs. Under this requirement, machinery may also have to be covered. The City is not sure of the benefits of these modifications.

It is difficult to meet the "no visible sheen" benchmark for parking lots. All parking lots may need to have oil/water separators to meet this benchmark. This benchmark is vague and needs clarification. Reevaluating and updating the SWPCP based on an exceedance of this benchmark is impractical. The use of the "no exposure" provision will not be applicable if "industrial machinery" is on site. Does industrial machinery include trucks, trailers, loaders, etc.?

17. **Tom Badrick, OECO Corporation**
4607 SE International Way, Milwaukie, OR 97222
OECO supports DEQ's efforts to streamline the process and limit the number of regulatory obligations placed on businesses while maintaining environmental stewardship. OECO also supports the efforts to consolidate the industrial storm water permits into a single one, 1200-Z.

18. **Kathleen Woods, Mt. Hood Chemical Corporation**
4444 NW Yeon Ave., Portland, OR 97210
Mt. Hood Chemical Corporation supports the changes proposed in the 1200-Z permit.

19. **Michael Campbell, Stoel Rives**
Both the 1200-A and the 1200-Z should include a provision that would authorize discharges from wastewater treatment and storage ponds during exceptional storm events. A one or two year storm event may be appropriate in defining an exceptional storm event. 40 CFR 411, Subpart C applies only to runoff from materials at facilities that manufacture cement, not runoff from materials at concrete batch plants and similar facilities where cement is not manufactured but is used as a raw material in the production of concrete. No facility subject to requirements under 40 CFR 411, subpart C would be eligible for coverage under the proposed 1200-A permit. Therefore, DEQ should delete the reference to 40 CFR 411 in the 1200-A permit.

20. **Kevin Godbout, Weyerhaeuser**
Corporate Headquarters, Tacoma, WA 98477
In general, Weyerhaeuser supports most of the changes proposed by DEQ in the proposed 1200-Z permit. However, the TSS benchmark is unachievable for wood products operations and should be eliminated. Alternatively, DEQ could develop a benchmark based on EPA's findings in the Federal Register, Volume 58, No.222, Friday, November 19, 1993. It is unclear if DEQ has given adequate consideration to meshing the benchmark concept with surface water quality standards. There is also an unresolved set of complex issues dealing with BMPs, mixing zones, points of compliance, design

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storm events, compliance with state groundwater standards and state requirements that exceed federal requirements.

21. **Aaron Wieting, Century West Engineering Corporation**
825 NE Multnomah, Suite 425, Portland, OR 97232
To streamline the permitting process, the DEQ should allow non-storm water discharges such as those allowed in EPA's multi-sector permit in its permit.

22. **Bret Bruhn, Praegitzer Industries**
1270 SE Monmouth Cutoff, Dallas, OR 97338
The benchmarks for the metals are quite stringent. The use of acute concentrations with a 5:1 dilution is extremely conservative. Industries with trace discharges of these metals account for much less than one-fifth of the storm runoff in a given drainage basin and we are not aware of any damage to aquatic ecosystems due to these discharges. Benchmarks for floating solids and debris are questionable. Maintaining landscaped areas is desirable to reduce storm water impacts but would contribute twigs, leaves, bark dust, etc. and thus, violate the floating solids & debris benchmark.

23. **H. Steve Clarke, Chemical Waste Management of the Northwest, Inc.**
17629 Cedar Springs Lane, Arlington, OR 97812
Overall, Chemical Waste Management (CWM) supports the changes to the general storm water permits. They also support the change which would allow a person knowledgeable in storm water management to develop the SWPCP. CWM strongly supports the benchmark concept but believes that the benchmarks concentrations for TSS and metals are low. High TSS levels and naturally occurring metals concentrations are generated from the infrequent runoff events in eastern Oregon. CWM suggests that the benchmarks in the proposed permits include a statement that allows for a percent reduction using BMPs, which would allow facilities to demonstrate the effectiveness of BMPs even though a benchmark may be exceeded.

CWM is concerned about the criteria for reevaluating the SWPCP. A single exceedance of a benchmark should not trigger a reevaluation of the SWPCP. The permit should allow for repeat sampling to confirm the exceedance before requiring a reevaluation. The permit should also include a condition to enable facilities to demonstrate that in place BMPs significantly reduce pollutant loads rather than triggering an automatic update of the SWPCP if a benchmark is exceeded. The monitoring reduction provision should be clarified to state that it applies to facilities that meet benchmarks **and** to those that demonstrate that exceedances are caused by background or natural conditions.

24. **Kathryn VanNatta, Northwest Pulp & Paper**
1300 114th Ave. SE, Bellevue, WA 98004
The TSS benchmark is unachievable for wood products operations and should be eliminated. Alternatively, DEQ could develop a benchmark based on EPA's findings in the Federal Register, Volume 58, No. 222, Friday, November 19, 1993. It is unclear if DEQ has given adequate consideration to meshing the benchmark concept with surface water quality standards. There is also an unresolved set of complex issues dealing with BMPs, mixing zones, points of compliance, design storm events, compliance with state groundwater standards and state requirements that exceed federal requirements.

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25. (b) (6)
[redacted], Portland, OR 97206
The issues regarding untested parameters raised by Dana McCullough and Portland Bureau of Environmental Services at the public hearing in Portland is an important point. The decision to reduce monitoring is based on an incomplete data set as many potentially serious polluters have not obtained permits or collected storm water data. The monitoring reduction should be given only to those facilities that have participated in providing monitoring data. Others should be required to adhere to the previous monitoring requirements until they can demonstrate that the contaminants in their storm water is the same as those generated by other facilities.

26. **Kathy Sperle, Willamette Industries, Inc.**
P. O. Box 907, Albany, OR 97321
The permit should be revised to record only those spills or leaks of significant materials that have impacted storm water or surface waters. It is unclear how the benchmarks for the metals were developed. The fact sheet does not identify the acute standards that were used and why these are considered to be appropriate in developing benchmarks. The TSS benchmark is unattainable for wood products facilities. The method used for developing the TSS benchmark does not give an accurate representation of our industries' storm water discharges. DEQ should develop a benchmark based on EPA's findings in the Federal Register, Volume 58, No. 222, Friday, November 19, 1993. The permit should be revised so that the SWPCP need not be revised more than one per year and more than 60 days should be allotted for revising the SWPCP. The older permits did not require submittal of written observations - the proposed permit should require that the observations be recorded and kept on file, but not submitted to DEQ.

27. **Rich Angstrom, Oregon Concrete & Aggregate Producers Association, Inc. (OCAPA)**
707 13th Street SE, Suite 115, Salem, OR 97301
OCAPA supports the transfer of responsibilities to the Department of Geology and Mineral Industries (DOGAMI) which is currently being negotiated. The proposed 1200-A permit needs to specify a storm event that the facility is designed for. Monitoring for metals is unnecessary for these facilities and should be eliminated. OCAPA supports the position taken by DOGAMI in its comment letter.

28. **Richard B. Shepard, Applied Ecosystem Services, Inc.**
2404 SW 22nd Street, Troutdale, OR 97060-1247
Monitoring for metals is unnecessary for facilities covered under the 1200-A permit and should be eliminated. The 1200-A should specify a storm event that treatment and storage facilities are designed for. A reasonable requirement for the aggregate industry might be a 10-year, 24-hour storm event west of the Cascades and a 2-year, 24-hour event east of the Cascades. Inserting a design storm would provide a measurable standard for compliance and would reduce potential liability.

29. **Ken Brinkerhoff, C & D Lumber Company**
P. O. Box 27, Riddle, OR 97469
Mr. Brinkerhoff agrees with combining the permits to reduce the number, however, he does not believe that the additional testing requirements for copper, lead and zinc in the 1200-Z permit are warranted.

30. **Wesley Jensen, East Side Plating**

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8400 SE 26th Place, Portland, OR 97202
East Side Plating (ESP) is concerned about the zinc benchmark. Previously sampling indicates that they would not be able to meet this benchmark because of the corrosion of the galvanized roofs at the facility. The only means of protecting these metal roofs is to paint them, which is an expensive proposition. It is unfair for industrial point sources to shoulder these additional costs when there is little or no control placed on residential sources of these pollutants.

31. **Dave Franks, Miller Paint Company**
12812 NE Whitaker Way, Portland, OR 97230
Miller Paint Company agrees with the change which would allow a person knowledgeable in storm water management to develop the SWPCP. They would like clarification of the language in Schedule A, Condition 1(d), which states that the SWPCP be "made available" to DEQ and other government agencies responsible for storm water management in the area. Specifically, they are concerned that requests to mail copies of the SWPCP and the associated Material Safety Data Sheets (MSDS) may be unnecessary and expensive. Miller Paint is concerned that Portland Bureau of Environmental Services (Portland) uses the BMPs to require costly modifications that provide little or no environmental benefit. They are also concerned about Portland's request to include monitoring for temperature in storm water discharges. Monitoring for temperature may be appropriate for some facilities but should not be required for all facilities. Miller Paint is concerned about the Total Maximum Daily Loads and their effect on the benchmarks. They support the monitoring waiver, which will reduce an undue burden on facilities that meet benchmarks.

32. **Dave Zepponi, Northwest Food Processors Association (NWFPA)**
6950 SW Hampton Street, #340, Portland, OR 97223-8329
NWFPA supports the elimination of monitoring for several parameters which were not of concern. They also support the expansion of the pH benchmark range to 5.5 - 9.0 and the use of benchmarks in lieu of effluent limits. NWFPA is concerned about the benchmarks and monitoring for TSS and metals. The TSS benchmark proposed by the Department is not scientific valid and is based on data and assumptions from the urbanized Portland area, which has little relationship to rural Oregon food processors. The 80% reduction used by the Department to calculate the benchmark for TSS is at the top end of the results presented in the Brown & Caldwell Consultants report; the average removal for storm water BMPs was 50%. The TSS benchmark and the associated monitoring should be removed.

However, NWFPA recognizes that TSS and the metals are parameters of concern to DEQ and EPA. NWFPA supports a permanent exemption from the monitoring requirements for TSS and metals after two consecutive sample results are below benchmark levels. Since there is no scientific basis for the TSS benchmark, it should be raised to a level where all food processors are compliant.

33. **Pamela J. Pulliam, City of Eugene**
858 Pearl Street, Eugene, OR 97401
Plans that are prepared by consultants should include a certification that they are knowledgeable in storm water management and are familiar with the specific facility. The SWPCP completion/update condition should be modified to require notification to the local storm water agency. Language should be added under Schedule A, 2.b.(i)(4) that states that erosion control methods be in compliance with local ordinance and regulation. The frequency of preventative maintenance monitoring should be twice per month during the wet weather season (October - May). The City agrees with the storm water only statement in Schedule A, condition 5, however, the permit should

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be revised to include other types of non-storm water discharges. The origin, amount, and whether or not a permit has been obtained for the discharge should be described by the facility.

In general, the City agrees with the benchmark concept. However, the benchmark for lead is too high and should be lowered. Given the number of streams that are water quality limited for dissolved oxygen, benchmarks for biochemical oxygen demand (BOD) and chemical oxygen demand (COD) should also be included. A benchmark for temperature should be added; the suggested benchmark is "no measurable increase in receiving stream temperature". The proposed permit should be modified to clearly establish a mechanism in cases where a facility does not meet benchmarks. Schedule A, condition 8 should require the facility to provide notification to DEQ and the local storm water agency when a benchmark is exceeded. The notification should provide an explanation for the exceedance and time frame to modify the SWPCP should be reduced to 30 days. The notification of the exceedance and the update of the SWPCP could be provided under the SWPCP update/completion reporting requirement in Schedule B.

DEQ should establish escalated enforcement procedures for continual exceedance of benchmarks to prevent industries from maintaining status quo. The facility should monitor for parameters for which the receiving stream is water quality limited. DEQ should reserve the right to add other parameters that may be present in storm water discharges. The sampling frequency should be listed as "twice per monitoring period" instead of "twice per calendar year". The City objects to the reduction or waiver of monitoring requirements. Storm water discharges are highly variable and two grab samples collected over a two-year period should not be the basis to reducing or eliminating the monitoring requirements. Twice per year sampling is not an undue burden and provide an effective means for assessing the BMPs employed by the facility. In situation where the benchmarks are exceeded, the Department should expand Schedule D, condition 2 to allow the examination of additional records such as wastewater discharges, SARA III information, hazardous materials use and storage, etc.

34. **Steve Hensley, American Trucking Association (ATA)**
2200 Mill Road, Alexandria, VA 22314-4677
DEQ should follow EPA's decision in its multi-sector permit that rigorous storm water monitoring is not a cost-effective strategy. Efforts should be focused on implementing storm water pollution prevention controls. DEQ should adopt recommendations of EPA's permit improvement efforts and use them to improve permits in Oregon. DEQ's combined proposed permit is arbitrary and not supported by current data. The one-size-fits-all approach would create overly burdensome requirements for the trucking industry. DEQ should review data and explain why its approach to regulating the trucking industry is different than EPA's. Storm water discharges from trucking facilities should not be placed into the same category as heavy industrial discharges unless pollutant loadings are identical to the heavy industries. Twice per year monitoring and monthly visual inspections are excessive, costly, and time consuming, and does not provide an environmental benefit. DEQ should follow EPA's lead in the multi-sector general permit which requires visual monitoring on a quarterly basis. DEQ should develop a two-tiered permit to reflect the variability in discharges from heavy and light industries.

While the permit states that the benchmarks are not limitations, they are used as such. By requiring re-evaluation of the SWPCP in situations where a facility does not meet the benchmarks, the benchmarks are being used as limits. The permit forces implementation of BMPs to meet

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benchmarks without concern for cost, time, space or liability. The permit does not provide any relief for failure to meet benchmarks and a facility can re-write its SWPCP endlessly. The permit should be modified to include "maximum extent practicable" language and limit the "additional practices or measures" language so facilities are not forced into expensive, endless BMPs.

The benchmark levels are not realistic and reliance on them will produce more work and little environmental benefit. The oil & grease and TSS benchmarks are too low and will create an endless re-write of the SWPCP. DEQ should eliminate the use of benchmarks as limitations and raise them from their current unattainable levels. For oil & grease, the benchmark should be established as a level that is reasonable and achievable by existing methods.

The requirement for the SWPCP to be prepared by "a person knowledgeable in storm water management" is an excessive burden on small trucking companies. This language should either be replaced by "a person knowledgeable of the site or facility" or the phrase "to the maximum extent practicable" be added to the beginning of this sentence. The proposed SWPCP requirements are excessive, expensive, inconsistent with storm water impacts, and troublesome for small businesses. The proposed permit requires structural BMPs, spill prevention and response procedures, compliance with a "no measurable increase in stream temperature" requirement. Requirements that are impossible to comply with or those that are redundant (i.e. spill prevention) should be eliminated.

35. **Mary Stephens, City of Portland - Environmental Services (Portland)**
1120 SW Fifth Ave., #400, Portland, OR 97204-1972
The number and type of facilities covered under the 1200-Z permit is too broad, and the benchmarks and monitoring requirements do not address the range of pollutants contributed by the industries regulated under this permit. Examples of this include airport de-icing operations (high BOD), food and animal products facilities (high fecal coliform and BOD), treatment storage and disposal facilities (metals and organics), landfills (metals, organics, bacteria), high-tech industries (chlorine and ammonia), etc. Portland strongly recommends that the 1200-Z permit be broken into two or three general permits based on activities and materials associated with the facility. Benchmarks and monitoring requirements can then be related to the pollutants that may be discharged from these facilities.

Temperature, dissolved oxygen, fecal coliform and sediment are common parameters for which streams are listed as being "water quality limited" (i.e. not meeting water quality standards). The proposed benchmarks and monitoring requirements do not provide sufficient protection for water quality limited streams. The proposed 1200-Z permit is inconsistent with the intent of Oregon Administrative Rules (OAR) 340-41-026(3)(C) because it does not address the potential discharge of pollutants that may contribute to further decline in water quality. The permit should be revised to require facilities to monitor and comply with benchmarks, total maximum daily loads (TMDLs)/Waste Load Allocations (WLAs), or interim guidelines, whichever is more stringent. In addition, the permit relies too much on self-implementation and does not include provisions for escalating enforcement or requirements.

Containment requirements should include all substances that may impact water quality not just hazardous substances. The permit should specify a specific containment volume for these structures. A temperature benchmark and monitoring requirement should be included. Schedule A, condition 4 of the permit should be revised to state that compliance with this permit does not meet the

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requirements in OAR 340-41-26(3)(D) and the permittee must prepare a temperature management plan. Portland agrees with the storm water only statement in Schedule A, condition 5, however, the permit should be revised to require facilities to list of non-storm water discharges in the SWPCP. The term "wastewater" should be replaced with "non-storm water" as it better reflects the intent of this condition.

In general, Portland supports the benchmark concept, however, the benchmarks do not address cumulative loadings to a receiving stream. In addition, the benchmark for lead is too high and should be reduced to prevent chronic toxicity and sediment contamination. The TSS benchmark should be reduced to 50 mg/l because of the significant pollutants associated with this parameter. The permit should also include benchmarks for BOD or COD. An e.coli benchmark should be included for food manufacturing, storage, rendering, or animal by-products facilities.

Monitoring requirements should be expanded to include temperature, TSS, BOD/COD, and e.coli. The permit should require monitoring and compliance with TMDL parameters. Portland interprets the "no exposure" condition to apply to facilities that are in a non-exemptable category. This provision should require an annual statement in lieu of monitoring. The "no exposure" provision should be expanded to include facilities that do not have discreet sampling points such as business parks that share a common catch basin. Portland strongly opposes the elimination of monitoring requirements.

The permit should require facilities to comply with local requirements for discharge to storm sewers. In addition to monitoring results, the annual report should also require summary of observations, activities at the site, changes, etc. The requirements of the 1700-J permit should be incorporated into the 1200-T permit for situations where vehicle washing is the only activity being conducted at a transportation facility. Portland supports the condition that the SWPCP be prepared by a person knowledgeable in storm water management and not necessarily a registered engineer, geologist or architect. The permit should outline a process that enables local jurisdictions to review and approve SWPCPs prior to issuance of permits and should allow the incorporation of additional activities. The permit should also allow public access to the SWPCP.

Schedule A of the permit states that BMPs shall be implemented if appropriate. The Department should clarify the mechanism that will be used to define when a BMP is "appropriate". BMPs should address material handling and bulk transfer activities, and housekeeping, and should emphasize re-use and recycling to reduce storm water discharges. The Spill Prevention and Response Procedures should state that an ASPP (accidental spill prevention plan) or similar document may be used to meet this requirement if it adequately addresses storm water concerns. Employee education activities should be documented. The SWPCP should identify the person at the facility that is responsible for implementing permit requirements.

Composite sampling for different drainage areas should not be considered to be representative of conditions at the site because it allows dischargers to select areas of the drainage basin that are in the best condition and is not representative of site conditions. Some facilities may not be able to take representative samples of storm water prior to mixing with other wastestreams; this language should be deleted. The following italicized language should be added to all three conditions in Schedule C "... according to the schedule set forth in the SWPCP *and approved by the Department*". Schedule

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D, condition 2 should be expanded to include related documents such as SWPCP notifications, no exposure monitoring waivers, responses to exceeding benchmarks, etc.

36. **Robin Weiner, Institute of Scrap Recycling Industries, Inc. (ISRI)**
1325 G Street, NW, Suite 1000, Washington D. C. 20005-3104
ISRI is concerned that Oregon's storm water permit goes beyond EPA's multi-sector permit in its use of benchmarks as a method of requiring modifications to the SWPCP and requiring implementation of additional BMPs. The proposed permit appears to require covering of certain areas of recycling facilities, and prohibits non-storm water discharges. These requirements are in direct contrast to the approach used by EPA. ISRI also requests that detailed regulatory guidance be provided by DEQ (similar to that provided by EPA) in its final permit to enable scrap processing and recycling facilities to understand and satisfy their obligations. DEQ should consider the costs of imposing new storm water controls on small businesses such as most of the ISRI facilities located in Oregon.

ISRI strongly opposes the imposition of monitoring requirements in the proposed permit due to its significant cost, administrative and economic burdens, limited use, and limited environmental benefits. Information characterizing discharges from these facilities have already been sent to EPA as part of the group application process and additional monitoring is not necessary. The BMPs and other regulatory requirements in the permit also preclude the need for monitoring. Due to the high variability of storm water, previous studies (including EPA's National Urban Runoff Program (NURP) study) have confirmed that monitoring programs have limited success in evaluating the effectiveness of BMPs. For these reasons, many states have either reduced or eliminated monitoring requirements. Eliminating monitoring requirements will enable facilities to focus on implementing BMPs. ISRI believes that the effectiveness of the BMPs can be assessed by site inspections and evaluation procedures.

If monitoring is required, ISRI believes that it should be at a lower frequency, involve fewer parameters, allow for group monitoring options, and exempt small businesses. In this case, monitoring should be required for one year only (one more year if benchmarks are exceeded), and a single indicator parameter such as lead should be sampled. The permit should be revised to prohibit the use of monitoring data in enforcement actions; this data should only be used as a tool to assess the effectiveness of a facility's BMPs.

ISRI supports the sampling waivers provided for "representative discharges" and "no exposure". ISRI also supports the provision that would enable a facility to cease monitoring if benchmarks are met, however, the waiver should be triggered after one sampling event rather than four as proposed by DEQ. Averaging should also be allowed in enabling facilities to meet the benchmarks. A temporary waiver should be granted for facilities that are unable to collect samples due to adverse conditions; the permit should also exempt monitoring for facilities that are inactive or understaffed. ISRI opposes the use of benchmarks as a means to require endless modifications of the SWPCP and implement additional BMPs. In effect, these benchmarks are being used as effluent limits. DEQ's benchmark approach goes well beyond the approach used by EPA, which only uses it as a basis for further monitoring. DEQ should modify the permit to reflect the approach used by EPA.

The proposed permit appears to require covering of certain areas of scrap processing and recycling facilities; this approach is inconsistent with the conclusion reached by EPA in its multi-sector permit. DEQ should simplify its proposed permit and make it easier for small businesses to comply. This

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can be accomplished by (1) eliminating/reducing monitoring requirements; (2) allowing flexibility in the SWPCP; (3) providing guidance to small businesses regarding DEQ's storm water regulatory program; and (4) mitigating enforcement actions on small businesses in certain instances.

The "storm water only" provision in the proposed permit is an unrealistic approach. DEQ should follow EPA's lead which authorizes discharges from several non-storm water related sources. The general terms and conditions of the permit should allow for modifications and operational flexibility without the need for amending the permit. These conditions should also include a "permit shield" provision to state that discharge requirements are specified in one single permit and this permit need not be modified to include more stringent regulatory controls that may be promulgated prior to expiration of the permit. The provision dealing with the listing of spills and leaks is overly burdensome and unnecessary. This provision should be modified to require listing of spills if releases of oil or hazardous substances exceed reportable quantities under applicable federal laws. Given the site inspections conducted at these facilities, visual monitoring should be performed on a semi-annual basis, if at all. Monitoring waivers should also be allowed for visual monitoring requirements.

The proposed permit states that secondary containment is required for the storage of hazardous materials to prevent leaks and spills from contaminating storm water. ISRI strongly opposes any interpretation of the permit which would require secondary containment for scrap piles. The permit and the fact sheet needs to state that this provision does not apply to scrap piles. This can be clarified by substituting the term "hazardous waste" as defined in the Resource Conservation and Recovery Act for "hazardous substances".

37. **Nina Bell, Northwest Environmental Advocates (NEA)**
133 SW 2nd Ave., #302, Portland, OR 97204
The Department does not appear to have given much consideration to achieve the goal of reducing pollution. The proposed permit removes nearly every protection a normal regulatory program uses to obtain compliance: enforceable limits, self-monitoring, and public records. The concerned public is unable to participate in the implementation of the general permit because of the way the program is administered by DEQ. The permit should be revised to require the permit holder to install signs at each point where its discharge enters public waters. Specific information should be included on the sign, which will enable the public to serve as effective advocate for pollution reduction. It is unclear what type of permit is issued to wood treating facilities. Does DEQ issue individual storm water permits to all wood preserving operations?

By not referencing or requiring facilities to meet water quality standards, the permit fails to meet the requirements of federal law (Section 301 of the Clean Water Act and 40 CFR 122.44 that implement this section). The permit is also inconsistent with Oregon's non-degradation policy, which applies to new or expanded discharges into water quality limited streams (OAR 340-41-026(3)(a)(C). The permit fails entirely to set out any timeframe for implementing BMPs and should be revised to do so. The permit should be revised to require that SWPCPs be submitted to DEQ. This will allow public access to the SWPCP, which is not available at present, and will enable concerned citizens to fully participate in implementing and enforcing this program. This issue is especially important since DEQ does not have the staffing to adequately administer the storm water program.

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The permit should be revised to retain the language that SWPCPs include procedures to meet any Oregon Administrative Rules for a specific river basin. With the large number of water quality streams, it can be assumed that further controls on storm water may be necessary in certain basins. The permit should be revised to retain the statement "no toxics in toxic amounts", which will ensure that permit holders cannot cause violations of the narrative criterion on toxic pollutants. In the absence of this condition, DEQ is helpless to protect public waters from toxic pollutants. The permit should be revised to include a provision that "caps" annual loads of relevant pollutants from the permitted sources not just the elimination of the mixing zone provision.

The condition in the permit that deals with temperature undermines the intent of the standard. The permit should be revised to require permit holders to implement a surface water temperature management plan as the rule requires. NEA disagrees with the use of the benchmarks and with the use of the monitoring waiver. The benchmark for lead should be reduced; the TSS benchmark of 130 mg/l should be converted into a limitation; the oil & grease limit should not be altered based on some sites not being able to meet the limit (the previous permit had a 10 mg/l limit; the proposed permit includes a benchmark value of 15 mg/l). DEQ should evaluate the types of industries that might discharge oil contaminated with toxic materials and target those facilities for special limitations and monitoring.

DEQ notes that turbidity is an indicator or the effectiveness of the SWPCP but the permit does not propose limits or benchmarks for this parameter. Since industrial storm water can contain many other pollutants than those specified in the permit, the SWPCP should require a description of practices or historic uses of the site that will likely result in other pollutants in the storm water discharge. The permit does not comply with 40 CFR 122.26(c)(1)(i)(C), which requires that an application include a certification that all outfalls have been tested or evaluated for the presence of non-storm discharges. Permit holders should be required to monitor for all pollutants for which the receiving stream is determined to be water quality limited.

Conditions requiring an update of the SWPCP are of little use since DEQ has no way of knowing that these plans are upgraded. By requiring submittal of plans, DEQ would ensure compliance. The provision dealing with natural or background conditions needs to be clarified. This provision should be restricted to pH and e.coli; the term background should be defined to not include any pollutant contributed by the site; the permit should state that natural or background conditions do not justify the permit holder's contribution; and the monitoring waiver should not apply as additional data is necessary to address the questions raised regarding natural or background conditions.

The permit should not allow permit holders to decide which outfalls to monitor and which to ignore in the absence of technical justification from DEQ or a water quality expert. NEA strenuously objects to the monitoring waiver and believes that neither the Department nor the public will have any way of ensuring the BMPs are being implemented. The face page of the permit should state that the permit does not, may not or will not apply where certain TMDLs are in place and/or receiving waters are limited by the parameters for which the permit allows discharge.

Attachments:
Comment letters from the people referenced above.

SCHN00245643

SCHNITZER STEEL PRODUCTS CO.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 286-5771 Telex 289875 FAX (503) 286-6948

April 4, 1997

Mr. Raj Kapur
Oregon Department of Environmental Quality
811 Southwest 6th Avenue
Portland, OR 97204

Re: Comments on Draft NPDES General Storm Water Permit No. 1200Z

Dear Mr. Kapur:

Schnitzer Steel Products Co. ("SSP") appreciates the opportunity to submit comments on DEQ's proposed General Storm Water Permit. SSP, which operates steel recycling facilities throughout the U.S., has developed innovative ways of improving storm water quality at our facilities. In fact, the U.S. Environmental Protection Agency ("EPA") presented SSP's General Metals of Tacoma facility with the second place award for Outstanding Storm Water Management in the industrial category in 1995.

Because our recycling operations are nationwide, and our markets are global, SSP's ability to compete depends in large part upon a regulatory climate that is consistent for each state in which we operate. For this reason, we strongly urge DEQ to develop storm water rules and permit standards that are consistent with applicable national trends and federal guidance. We believe that EPA's NPDES Storm Water General Permit for Industrial Activities ("multi-sector permit") provides a good framework for consistency. The multi-sector permit was developed at significant expense by federal staff with broad storm water regulatory experience, and was modified in response to comments from many industrial sectors.

In general, the multi-sector permit allows for much greater flexibility both for the agency and permittees than DEQ's draft permit. SSP believes that by building flexibility into storm water permit provisions, DEQ's administrative burdens will decrease, and compliance will increase. An example of the type of flexibility we envision would be a provision allowing for reasonable permit modification without a formal permit amendment or approval process in the general terms and conditions.

DEQ's draft general permit differs from EPA's multi-sector permit in many other important respects:

- The multi-sector permit does not require analytical monitoring, while the draft DEQ permit requires steel recycling facilities to sample storm water for laboratory analysis at least twice annually. SSP agrees with EPA's determination that analytical monitoring does not provide accurate or meaningful information regarding the overall

quality of an industrial facility's storm water runoff, and that resources directed toward implementation of BMPs are much more effective in reducing pollution from storm water. Moreover, at least 24 other state environmental agencies do not require analytical monitoring of storm water at steel recycling facilities.

If analytical monitoring is to be required in the final permit, SSP strongly believes that it is inappropriate to require a single suite of analytical parameters for a broad range of industrial categories. A single indicator parameter, such as lead, would be adequate to identify problems at steel recycling facilities.

- The use of "benchmark" concentration levels to establish a basis for further monitoring is well beyond the requirements of the multi-sector permit. These "benchmarks" are not significantly different from numerical effluent standards, which impose high compliance costs on industrial facilities while producing little benefit compared to implementation of effective BMPs.

- The draft permit indicates that steel recycling facilities may be required to cover (roof) portions of their facilities, while EPA's multi-sector permit specifically states that such covers would not be appropriate.

- The draft permit allows discharge of storm water only. EPA's multi-sector permit allows for discharge of other water, including water used for lawn irrigation, water from springs, clean groundwater, etc. The draft permit should be modified to broaden the allowed discharges, similar to the multi-sector permit. Discharge of clean non-storm water is reasonable and will significantly reduce the administrative burden required to modify a permit to allow such discharges.

In addition, the draft permit's SWPCP requires industrial facilities to maintain a list of spills or leaks of significant materials for 3 years. This requirement goes well beyond existing state and federal spill reporting requirements, and places an unwarranted new paperwork burden on permittees. Since a comprehensive list of reportable quantities of hazardous substances has been established by rule (OAR 340-108 and 40 CFR Part 302), adding a record keeping requirement with a nebulous definition of reportable spills is not necessary.

Finally, clarification should be made regarding the draft permit requirement that secondary containment be provided for "hazardous substances". SSP is concerned that this will be interpreted to include stockpiles of scrap iron and steel. Secondary

containment of stockpiles at most steel recycling facilities would be costly and impractical, since the stockpiles often contain several thousand tons of material. The permit language should be modified to specify that secondary containment be required only for storage of hazardous waste, or other narrowly defined hazardous materials.

Please contact me at (503) 286- 6944 if you have questions.

Sincerely,
Schnitzer Steel Products Co.

Timothy R. Todd

Timothy R. Todd
Environmental Administrator

Columbia Analytical Services

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

1317 South 13th Ave • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068 DATE 12/3/96 PAGE 1 OF 1

PROJECT NAME: SSPE-SW

PROJECT MANAGER: Tim Todd

COMPANY/ADDRESS: Schnitzer Steel, PO Box 10047, Portland OR 97210 PHONE: 503-736-6[illegible]

SAMPLERS SIGNATURE: Timothy R. Todd

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neutral & Acids GCMS 625/8270	Volatile Organics GCMS 624/8240	Halogenated or Aromatic Volatiles 601/8010	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA418.1	TPH Gas/BTEX Gas/BTEX 8015/8021	TPH 8015 Modified Diesel/Oil hydrocarbon Scan	TPH HCID/ORHCID WA/HCID	TOC Metals	Metals (Cd, Cr, Cu, Pb, Hg, Ni, Zn)	Sat'n Test VOAs Hg	List Sample Dissolved Metals	Chloride	pH Cond/Cl SO4 NO2 NO3	Mercury (Hg)	Total Organic Halides (TOX) 9020 CIAOX	1650A13	TOC	TSS	REMARKS
A	12/3	1945		H2O	4										X	X			X	X	X	X	X	X	
B	(	1940		(	1										X	X			X	X	X	X	X	X	
C	↓	1500			↓										X				X	X	X	X	X	X	
IF	↓	1505		↓											X				X	X	X	X	X	X	

RELINQUISHED BY: Timothy R. Todd
Signature: Timothy Todd
Printed Name: Schnitzer Steel
Firm:
Date/Time: 12/5/96 1800

RECEIVED BY:
Signature:
Printed Name:
Firm:
Date/Time:

RELINQUISHED BY:
Signature:
Printed Name:
Firm:
Date/Time:

RECEIVED BY:
Signature:
Printed Name:
Firm:
Date/Time:

TURNAROUND REQUIREMENTS
24 hr. ___ 48 hr. ___ 5 day
X Standard (10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX preliminary Results
Requested Report Date ___

REPORT REQUIREMENTS
X I. Routine Report
___ II. Report (includes DUP, MS, MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION
P.O.# ___
Bill To ___

SAMPLE RECEIPT
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No: ___

SPECIAL INSTRUCTIONS/COMMENTS:
* Total metals: As, Cd, Cr, Cu, Pb, Hg, Ni, Zn
TSS = EPA method 160.2 TOC = EPA method 415.1
COD = EPA method 410.1 O&G = EPA Method 413.2

WHITE - return to originator; YELLOW - lab; PINK - retained by originator 400-06

SCHN00245669

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CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

DATE 11/27/96 PAGE 1 OF 1

PROJECT NAME: SSI-SW
PROJECT MANAGER: Tim Todd
COMPANY/ADDRESS: P O Box 10047, Portland, OR 97210
PHONE: 503/236-4944
SAMPLERS SIGNATURE: Timothy R. Todd

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Gas/Neu/Acid Organics GC/MS 625/625/270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA418.1 ☐ ORPH ☐ WA418.1 ☐	TPH Gas/BTEX 5030/8015/8020 Gas ☐ BTEX ☐	TPH 8015 Modified Diesel ☐ Hydrocarbon Scan ☐	TPH HCID ☐ WAHCID ☐ ORHCID ☐	TCLP Metals ☐ VOAs ☐ Semi Vol ☐ Pest ☐	Metals (Circle List Below) Grande	X	TH Cond. Cl, SO4, PO4, F, NO2, NO3 (circle)	NH3-N, COD (circle)	Total Organic Halides (TOX 9020) OXON	Total P, TKN, TOC EPA 415.1	TSS	REMARKS
SSI-SW-0	11/27	0835		H2O											X			X		X	X	
SSI-SW-6		0850													X			X		X	X	
SSI-SW-7		0905													X			X		X	X	
SSI-SW-8		0910													X			X		X	X	
SSI-SW-9		0920													X			X		X	X	
SSI-SW-10		0945													X			X		X	X	
SSI-SW-11		0948													X			X		X	X	
SSP-SW-13		1000													X			X		X	X	

RELINQUISHED BY:	RECEIVED BY:
Signature: Timothy R. Todd	Signature:
Printed Name: Timothy Todd	Printed Name:
Firm: Envirotec Steel	Firm:
Date/Time: 11/27/	Date/Time:

RELINQUISHED BY:	RECEIVED BY:
Signature:	Signature:
Printed Name:	Printed Name:
Firm:	Firm:
Date/Time:	Date/Time:

TURNAROUND REQUIREMENTS: 24 hr. ___ 48 hr. ___ 5 day
X Standard (10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX preliminary Results
Requested Report Date: ___

REPORT REQUIREMENTS:
X I. Routine Report
X II. Report (includes DUP, MS, MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O.#: ___
Bill To: ___

SAMPLE RECEIPT:
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No: ___

SPECIAL INSTRUCTIONS/COMMENTS:
* Total metals = As, Cd, Cr, Cu, Pb, Hg, Ni, Zn
Method 200 series
TSS = EPA method 160.2 TOC = EPA method 415.1
COD = EPA method 1201 O&G = EPA method 413.2

WHITE - return to originator, YELLOW - lab, PINK - retained by originator 400-05

SCHN00245670

Columbia Analytical Services™ 1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

DATE 11-20-96 PAGE 1 OF 1

PROJECT NAME: SSI - Stormwater Sampling
PROJECT MANAGER: Tim Todd
COMPANY/ADDRESS: 3700 NW Yeon Avenue, P.O. Box 10047, Portland, Oregon 97210
PHONE: (503) 286-6944
SAMPLERS SIGNATURE: Timothy R. Todd

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Gas/Neu/Acid Organics GC/MS 625/625/1	Volatile Organics GC/MS 624/624/1	Halogenated Organics 601/8010	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA418.1/TPH 418.1	TPH Gas/BTEX 503/8015/8020	TPH 8015 Modified Diesel	TPH HCID/ORHCID WWHCID	TCLP Metals	Metals (Check List Below)	Cyanide	Total P, SO4, PO4, NO3, NO2	Total Kjeldahl N	Total Organic Halides (TOX) 9020	Total Organic Carbon (TOC)	Total Oil & Grease (HAOG) 1664	REMARKS
SSI-SW-1	11-18-96	1315		Water	4										X		X	X		X	X	
SSI-SW-2	11-18-96	1345		Water	4										X		X	X		X	X	
SSI-SW-3	11-18-96	1415		Water	4										X		X	X		X	X	
SSI-SW-4	11-18-96	1415		Water	4										X		X	X		X	X	
SSI-SW-5	11-18-96	1515		Water	4										X		X	X		X	X	

RELINQUISHED BY:	RECEIVED BY:
Signature: Timothy R. Todd	Signature:
Printed Name: Tim Todd	Printed Name:
Firm: Schnitzer Steel Products Co.	Firm:
Date/Time:	Date/Time:

TURNAROUND REQUIREMENTS: 24 hr. 48 hr. 5 day
X Standard (10-15 working days)
Provide Verbal Preliminary Results
Provide FAX preliminary Results
Requested Report Date:

REPORT REQUIREMENTS:
I. Routine Report
X II. Report (includes DUP, MS, MSD, as required, may be charged as samples)
III. Data Validation Report (includes All Raw Data)
IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O.#:
Bill To:

SAMPLE RECEIPT:
Shipping VIA:
Shipping #:
Condition:
Lab No:

RELINQUISHED BY:	RECEIVED BY:
Signature:	Signature:
Printed Name:	Printed Name:
Firm:	Firm:
Date/Time:	Date/Time:

SPECIAL INSTRUCTIONS/COMMENTS:
Total Metals Analyses:
As, Cd, Cr, Cu, Pb, Hg, Ni, Zn
EPA Method 200 Series

pH - EPA Method 9040
Total suspended solids - EPA Method 160.2
Conductivity - EPA Method 120.1
COD - EPA Method 410.4
TOC - EPA Method 415.1
Oil & Grease - EPA Method 413.2

DISTRIBUTION: WHITE - returned to originator; YELLOW - lab; PINK - retained by originator

400-05

SCHN00245671

File

SCHNITZER STEEL PRODUCTS CO.

12005 N. Burgard St. Portland, Oregon 97203
P.O. Box 10047 Portland, Oregon 97210
Phone 503/286-5771 FAX 503/286-6948

July 13, 1999

Mr. Paul Keiran
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201-4987

Re: Storm Water Monitoring Results for 1998 – 1999 Permit #1200-Z, File #108103

Dear Mr. Keiran:

The tabulated storm water analytical data for the Schnitzer Steel Product's Co.'s facility located at 12005 North Burgard Road in Portland is attached. In January 1999 we installed a Vortechs Storm Water Treatment System at an area of our Site to improve storm water quality. We also continue to implement previously identified Best Management Practices (e.g., facility vacuuming/sweeping of roadways, use of catch basin filters, catch basin cleaning, installation of passive oil skimmers, etc.) to enhance the efficiency of the Vortechs system. We also continue to review available water quality treatment literature to evaluate further enhancement of our Best Management Practices.

We are also actively engaging our neighbors at upgradient locations to improve their water quality discharges. Many of our industrial neighbors discharge storm water through our storm drainage systems and outfalls. By continuing to encourage our neighbors to use better management practices, we hope to continue to reduce or eliminate their contribution of total suspended sediment, oil and grease, and other constituents to the storm drain outfalls.

Please contact me at (503) 286-6976 if you have questions.

Sincerely,
Schnitzer Steel Products Co.

Jim Jakubiak
Environmental Administrator

Attachments: Table 1
Laboratory Reports

Cc: Tom Zelenka

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

				Laboratory Results			
Outfall	Date	pH	TSS	TPH	Copper	Lead	Zinc
2	11/23/98	7.56	280	23	0.725	1.06	7.67
	5/3/99	7.21	23	12	0.085	0.126	1.71
3	11/23/98	6.87	200	9	7.08	0.344	0.806
	5/3/99	7.09	ND	ND	0.051	0.027	0.262
4	11/23/98	9.75	1120	18	0.499	0.26	0.973
	5/3/99	7.06	ND	ND	0.197	0.003	0.064
5	11/23/98	8.36	220	9	4.76	0.284	0.49
	5/3/99	7.04	ND	ND	0.022	0.008	0.074
6	11/23/98	8.97	420	8	1.27	0.256	0.757
	5/3/99	7.05	ND	ND	0.073	0.004	0.012
7	11/23/98	8.15	19	6	0.132	0.088	0.237
	5/3/99	7.47	8	ND	0.012	0.003	0.011
8	11/23/98	8.2	46	8	0.169	0.116	0.336
	5/3/99	7	6	ND	0.199	0.004	0.063

Notes:

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.

Outfall sample 8 is a field duplicate of outfall sample 7 on 11/23/98.

Outfall sample 8 is a field duplicate of outfall sample 4 on 5/3/99.

ND - Not detected

No floating solids or oil and grease sheen were noted during monthly monitoring.

Columbia Analytical Services INC.
An Employee-Owned Company

December 16, 1998

Service Request No: K9808122

Tim Todd
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97296-0047

Re: SSP

Dear Tim:

Enclosed are the results of the sample(s) submitted to our laboratory on November 25, 1998. Preliminary results were transmitted via facsimile on December 16, 1998. For your reference, these analyses have been assigned our service request number K9808122.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 239.

Respectfully submitted,

Columbia Analytical Services, Inc.

Howard Boorse
Project Chemist

HB/bej

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Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9808122
Project:	SSP	**Date Collected:**	11/23/98
Sample Matrix:	Water	**Date Received:**	11/25/98
		Date Extracted:	NA

Inorganic Parameters
Units: mg/L (ppm)

Analyte:		**pH (units)**	**Solids, Total Suspended (TSS)**
EPA Method:		150.1	160.2
Method Reporting Limit:		-	5
Date Analyzed:		11/25/98	11/25/98
Sample Name	**Lab Code**		
2	K9808122-001	7.56 (H)	280
3	K9808122-002	6.87 (H)	200
4	K9808122-003	9.75 (H)	1120
5	K9808122-004	8.36 (H)	220
6	K9808122-005	8.97 (H)	420
7	K9808122-006	8.15 (H)	19
8	K9808122-007	8.20 (H)	46
Method Blank	K9808122-MB	-	ND

H The Sample was received past the recommended hold time.

Approved By: _____ Date: 12/9/98

3ADW/061694
08122WET.LJ1 - 3_Tests 12/9/98

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9808122
Project:	SSP	**Date Collected:**	11/23/98
Sample Matrix:	Water	**Date Received:**	11/25/98
		Date Extracted:	12/8/98

Total Metals
Units: µg/L (ppb)

	Analyte:	**Copper**	**Lead**	**Zinc**
	EPA Method:	6010B	7421	6010B
	Method Reporting Limit:	10	2	10
	Date Analyzed:	12/8/98	12/13/98	12/8/98
Sample Name	**Lab Code**			
2	K9808122-001	725	1060	7670
3	K9808122-002	7080	344	806
4	K9808122-003	499	260	973
5	K9808122-004	4760	284	490
6	K9808122-005	1270	256	757
7	K9808122-006	132	88	237
8	K9808122-007	169	116	336
Method Blank	K9808122-MB	ND	ND	ND

Approved By: _____ Date: 12/15/98

3AEPA/102594

08122ICP.EA1 - Sample 12/15/98

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co,
Project: SSP
Sample Matrix: Water

Service Request: K9808122
Date Collected: 11/23/98
Date Received: 11/25/98
Date Extracted: 12/14/98
Date Analyzed: 12/14/98

Oil and Grease
EPA Method 413.1
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
2	K9808122-001	5	23
3	K9808122-002	5	9
4	K9808122-003	5	18
5	K9808122-004	5	9
6	K9808122-005	5	8
7	K9808122-006	5	6
8	K9808122-007	5	8
Method Blank	K981214-MB	5	ND

Approved By: M Manthey Date: 12/16/98

1AMRL/102594
08122PHC.FP1 - 413w 12/15/98

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SR#: K9808122

PAGE 1 OF 1 COC #

PROJECT NAME: SSP
PROJECT NUMBER:
PROJECT MANAGER: Tim Todd
COMPANY/ADDRESS: P.O. Box 10047
Portland OR 97296-0047
PHONE #: 503/286-6944 FAX #: 286-6948
SAMPLER'S SIGNATURE: Tim Todd

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics by GC/MS 625☐ 8270☐	Volatile Organics 624☐ 8260☐ 8021☐ BTEX☐	Pesticide / Herbicides 608☐ 8081☐ 8141☐ 8151☐	Total Toxic Organics (TTO) 608☐ 624☐ 625☐	PCB AROCLORs 8082	NWTPH - HCID☐ NWTPH-D☐ NWTPH-G☐	Hydrocarbon Scan☐ O & G☐	Chlorophenolics - 8151M Tri☐ Tetra☐ PCP☐	PAHs 8310☐ SIM☐	GC/MS-SIM PAH☐ Phenol☐ Phthalates☐	Metals, Total & Dissolved (See list below)	Cyanide☐ Hex-Chrom☐	pH Cond. Cl, SO4, PO4, F, NO2, NO3, BOD, TSS, TDS (circle)	NH3-N, COD, Total-P, TKN, TOC, DOC (circle)	TOC 9020☐ AOX 1650☐ 506☐	TPH-418.1				REMARKS
2	11/23	1320	1	H2O	3											X		X			X				
3		1330	2													X		X			X				
4		1347	3													X		X			X				
5		1410	4													X		X			X				
6		1430	5													X		X			X				
7		1455	6													X		X			X				
8		1510	7													X		X			X				

REPORT REQUIREMENTS

- 1 I. Routine Report: Method Blank, Surrogate, as required
- ___ II. Report Dup., MS, MSD as required
- ___ III. Data Validation Report (includes all raw data)
- ___ IV. CLP Deliverable Report
- ___ V. EDD

INVOICE INFORMATION

P.O. #
Bill To:

TURNAROUND REQUIREMENTS

- ___ 24 hr. ___ 48 hr.
- ___ 5 Day
- X Standard (10-15 working days)
- ___ Provide FAX Results

Requested Report Date

Circle which metals are to be analyzed:

Total Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

SPECIAL INSTRUCTIONS/COMMENTS:

RELINQUISHED BY:	RELINQUISHED BY:	RELINQUISHED BY:	RELINQUISHED BY:
Signature: Tim Todd	Signature: [illegible]	Signature	Signature
Date/Time: 11/24/98	Date/Time: 11/25/98	Date/Time	Date/Time
Printed Name: Tim Todd	Printed Name: [illegible]	Printed Name	Printed Name
Firm: SSP	Firm: CAS	Firm	Firm

SCHN00245689

Columbia Analytical Services INC.
An Employee-Owned Company

May 21, 1999

Service Request No: K9902824

Jim Jakubiak
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97296-0047

Re: SSP

Dear Jim:

Enclosed are the results of the sample(s) submitted to our laboratory on May 6, 1999. For your reference, these analyses have been assigned our service request number K9902824.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 260.

Respectfully submitted,

Columbia Analytical Services, Inc.

Harvey Jacky
Project Chemist

HJ/klg

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Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Steel Products Co.	**Service Request No.:**	K9902824
Project:	SSP	**Date Received:**	5/6/99
Sample Matrix:	Water		

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of Columbia Analytical Services, Inc. (CAS). This report contains analytical results for sample(s) designated for Tier I data deliverables. When appropriate to the method, method blank results have been reported with each analytical test.

All EPA recommended holding times have been met for analyses in this sample delivery group.

The following difficulties were experienced during analysis of this batch:

Samples #2, #3, #4, #5, #6, #7, and #8 were received past the recommended holding time for pH, EPA Method 150.1. The samples were analyzed as soon as possible after receipt by the laboratory.

No other difficulties were experienced during analysis of this batch.

Approved by HS **Date** 5/20/99

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9902824
Project:	SSP	**Date Collected:**	5/3/99
Sample Matrix:	Water	**Date Received:**	5/6/99
		Date Extracted:	NA

Inorganic Parameters
Units: mg/L (ppm)

Analyte:	pH (units)	Solids, Total Suspended (TSS)
EPA Method:	150.1	160.2
Method Reporting Limit:	-	5
Date Analyzed:	5/6/99	5/7/99

Sample Name	Lab Code		
#2	K9902824-001	7.21 (H)	23
#3	K9902824-002	7.09 (H)	ND
#4	K9902824-003	7.06 (H)	ND
#5	K9902824-004	7.04 (H)	ND
#6	K9902824-005	7.05 (H)	ND
#7	K9902824-006	7.47 (H)	8
#8	K9902824-007	7.00 (H)	6
Method Blank	K9902824-MB	-	ND

H The Sample was received past the recommended hold time.

Approved By: _____ Date: 5/11/99

3ADW/061694
02824WET.L11 - 3_Tests 5/11/99

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9902824
Project:	SSP	**Date Collected:**	5/3/99
Sample Matrix:	Water	**Date Received:**	5/6/99
		Date Extracted:	5/7/99

Total Metals
Units: µg/L (ppb)

	Analyte:	**Copper**	**Lead**	**Zinc**
	EPA Method:	6010B	7421	6010B
	Method Reporting Limit:	10	2	10
	Date Analyzed:	5/11/99	5/7, 10/99	5/11/99
Sample Name	**Lab Code**			
#2	K9902824-001	85	126	1710
#3	K9902824-002	51	27	262
#4	K9902824-003	197	3	64
#5	K9902824-004	22	8	74
#6	K9902824-005	73	4	12
#7	K9902824-006	12	3	11
#8	K9902824-007	199	4	63
Method Blank	K9902824-MB	ND	ND	ND

Approved By: _____ Date: 5/14/99

3AEPA/102694

02824ICP.BR1 - Sample 5/13/99

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Water

Service Request: K9902824
Date Collected: 5/3/99
Date Received: 5/6/99
Date Extracted: 5/20/99
Date Analyzed: 5/20/99

Oil and Grease
EPA Method 413.1
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
#2	K9902824-001	5	12
#3	K9902824-002	5	ND
#4	K9902824-003	5	ND
#5	K9902824-004	5	ND
#6	K9902824-005	5	ND
#7	K9902824-006	5	ND
#8	K9902824-007	5	ND
Method Blank	K990520-WB	5	ND

Approved By: M Manthe Date: 5/20/99

1AMRL/102594
02824PHC.CR1 - 413w 5/20/99

Columbia Analytical Services INC.
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SR#: Y9902824

PAGE 1 OF 1 COC # 1

PROJECT NAME: SSP
PROJECT NUMBER:
PROJECT MANAGER: Jim Jakubiak
COMPANY/ADDRESS: P.O. Box 10047
Portland, Oregon 9796-0047
PHONE #: (503) 286-6976 FAX#: (503) 286-6948
SAMPLER'S SIGNATURE: James J Jakubiak

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics by GC/MS 625☐ 8270☐	Volatile Organics 624☐ 8260☐ 8021☐ BTEX☐	Pesticide / Herbicides 608☐ 8081☐ 8141☐ 8151☐	Total Toxic Organics (TTO) 608☐ 624☐ 625☐	PCB AROCLORs 8082	NWTPH - HCID☐ NWTPH-D☐ NWTPH-G☐	Hydrocarbon Scan☐ O & G☐	Chlorophenolics - 8151M Tri☐ Tetra☐ PCP☐	PAHs 8310☐ SIM☐	GC/MS-SIM PAH☐ Phenol☐ Phthalates☐ Metals, Total or Dissolved (See list below)	Cyanide☐ Hex-Chrom☐	pH, Cond., Cl, SO_4, PO_4, F, NO_2, NO_3, BOD, (TSS) DS (circle)	NH_3-N, COD, Total-P, TKN, TOC, DOC (circle)	TOC 9020☐ AOX 1650☐ 506☐	TPH-413.1				REMARKS
#2	5-3-99	10:10		H2O											X		X			X				
#3	5-3-99	10:30		↓											X		X			X				
#4	5-3-99	11:10		↓											X		X			X				
#5	5-3-99	10:40		↓											X		X			X				
#6	5-3-99	10:15		↓											X		X			X				
#7	5-3-99	11:25		↓											X		X			X				
#8	5-3-99	12:00		↓											X		X			X				

REPORT REQUIREMENTS

X I. Routine Report: Method Blank, Surrogate, as required
___ II. Report Dup., MS, MSD as required
___ III. Data Validation Report (includes all raw data)
___ IV. CLP Deliverable Report
___ V. EDD

INVOICE INFORMATION

P.O. #
Bill To: Jim Jakubiak
P.O. Box 10047
Portland, OR 979-0047

TURNAROUND REQUIREMENTS

___ 24 hr. ___ 48 hr.
___ 5 Day
X Standard (10-15 working days)
___ Provide FAX Results

Requested Report Date

Circle which metals are to be analyzed:

Total Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

SPECIAL INSTRUCTIONS/COMMENTS:

RELINQUISHED BY:	RELINQUISHED BY:	RELINQUISHED BY:	RELINQUISHED BY:
Signature: James J Jakubiak Date/Time: 5-5-99/0800	Signature: [illegible] Date/Time: 5/6/99	Signature: Date/Time:	Signature: Date/Time:
Printed Name: James Jakubiak Firm: SSP	Printed Name: [illegible] Firm: CAS	Printed Name: Firm:	Printed Name: Firm:

SCHN00245696

SCHNITZER STEEL PRODUCTS CO.

3200 N.W. Yeon Ave. P.O. Box 10047 Portland, Oregon 97210
Phone 503/224-9900 Telex/W.U.U.36-0144 FAX 503/323-2793

July 2, 1998

Mr. Paul Keiran
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201-4987

Re: Stormwater Monitoring Results for 1997 - 1998 Permit #1200-Z, File #108103

Dear Mr. Keiran:

The tabulated storm water analytical data for the Schnitzer Steel Products Co.'s facility located at 12005 North Burgard Road in Portland is attached. We have cleaned or re-installed filters and placed passive oil skimmers in many of our catchbasins. In addition, we are reviewing our SWPCP and consulting with a local engineering firm to identify any additional site controls that may be needed to further improve the quality of stormwater discharges.

Please contact me at (503) 286-6944 if you have questions.

Sincerely,
Schnitzer Steel Products Co.

Timothy R. Todd

Timothy R. Todd
Environmental Administrator

Attachments: Table 1
Laboratory Reports

Cc: Tom Zelenka

Table 1
Storm Water Sampling Results
Schnitzer Steel Industries, Inc.
Portland, Oregon
(mg/L)

Sample Data		Laboratory Results					
Outfall	Date	pH[a]	COD	TOC	Conduct[b]	TSS	TPH
2	12/9/97	7.82	358	110	863	184	40
	5/20/98	7.64	NA	NA	NA	208	12.6
3	12/9/97	7.63	236	73	561	96	12
	5/20/98	7.96	NA	NA	NA	94	5.1
4	12/9/97	9.41	7	5.1	221	65	<5
	5/20/98	7.74	NA	NA	NA	360	5.7
5	12/9/97	8.49	19	25.6	158	73	26
	5/20/98	7.60	NA	NA	NA	130	3.3
6	12/9/97	9.98	18	7.5	679	101	<5
	5/20/98	7.98	NA	NA	NA	412	3.9
7	12/9/97	8.87	16	10.1	114	452	9
	5/20/98	8.16	NA	NA	NA	270	4.5

Note:
No floating solids or oil and grease sheen were noted during monthly monitoring.
[a] Results in SU.
[b] Results in µmho/cm.
[c] Not analyzed.

Table 1
Storm Water Sampling Results
Schnitzer Steel Industries, Inc.
Portland, Oregon
(mg/L)

Sample Data		Laboratory Results - Metals							
O/F	Date	As	Cd	Cr	Cu	Pb	Hg	Ni	Zn
2	12/9/97	<0.005	0.016	0.041	0.310	0.606	0.0022	0.048	4.47
	5/20/98	NA	NA	NA	0.624	1.060	NA	NA	5.72
3	12/9/97	<0.005	0.011	0.023	0.267	0.424	0.0012	0.034	3.21
	5/20/98	NA	NA	NA	0.586	0.394	NA	NA	2.51
4	12/9/97	<0.005	<0.004	0.024	1.390	0.146	<0.0005	<0.02	0.56
	5/20/98	NA	NA	NA	4.230	0.456	NA	NA	2.10
5	12/9/97	<0.005	0.018	0.188	1.810	1.390	0.0048	0.113	3.93
	5/20/98	NA	NA	NA	0.431	0.562	NA	NA	1.61
6	12/9/97	<0.005	<0.004	0.021	0.565	0.115	<0.0005	<0.02	0.28
	5/20/98	NA	NA	NA	0.801	0.160	NA	NA	0.56
7	12/9/97	<0.005	<0.004	0.031	0.505	0.263	0.0008	<0.02	0.63
	5/20/98	NA	NA	NA	0.203	0.078	NA	NA	0.29

Note:

[a] Not analyzed.

Columbia Analytical Services inc.

June 10, 1998

Service Request No: K9803269

Tim Todd
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97296-0047

Re: SSP-SW

Dear Tim:

Enclosed are the results of the sample(s) submitted to our laboratory on May 22, 1998. For your reference, these analyses have been assigned our service request number K9803269.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 239.

Respectfully submitted,

Columbia Analytical Services, Inc.

Howard Boorse
Project Chemist

HB/sm

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 360/577-7222 • Fax 360/636-1068

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9803269
Project:	SSP-SW	**Date Collected:**	5/20/98
Sample Matrix:	Water	**Date Received:**	5/22/98
		Date Extracted:	NA

Inorganic Parameters
Units: mg/L (ppm)

Analyte:	pH (units)	Solids, Total Suspended (TSS)
EPA Method:	150.1	160.2
Method Reporting Limit:	-	5
Date Analyzed:	5/22/98	5/27/98

Sample Name	Lab Code		
1	K9803269-001	7.64 (H)	208
2	K9803269-002	7.96 (H)	94
3	K9803269-003	7.74 (H)	360
4	K9803269-004	7.60 (H)	130
5	K9803269-005	7.98 (H)	412
6	K9803269-006	8.16 (H)	270
Method Blank	K9803269-MB	-	ND

H The Sample was received past the recommended hold time.

Approved By: _____ Date: 6/9/98

3ADW/061694
03269WET.LJ1 - 3_Tests 6/9/98

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9803269
Project:	SSP-SW	**Date Collected:**	5/20/98
Sample Matrix:	Water	**Date Received:**	5/22/98
		Date Extracted:	5/27/98

Total Metals
Units: µg/L (ppb)

	Analyte:	**Copper**	**Lead**	**Zinc**
	EPA Method:	6010A	7421	6010A
	Method Reporting Limit:	10	2	10
	Date Analyzed:	6/8/98	5/29/98	6/8/98
Sample Name	**Lab Code**			
1	K9803269-001	624	1060	5720
2	K9803269-002	586	394	2510
3	K9803269-003	4230	456	2100
4	K9803269-004	431	562	1610
5	K9803269-005	801	160	561
6	K9803269-006	203	78	288
Method Blank	K9803269-MB	ND	ND	ND

Approved By: _____ Date: 6/3/98

3AEPA/102694

032691CP.EA1 - Sample 6/8/98

SCHN00245703

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9803269
Project:	SSP-SW	**Date Collected:**	5/20/98
Sample Matrix:	Water	**Date Received:**	5/22/98
		Date Extracted:	6/4/98
		Date Analyzed:	6/4/98

Petroleum Hydrocarbons
EPA Method 418.1
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
1	K9803269-001	0.5	12.6
2	K9803269-002	0.5	5.1
3	K9803269-003	0.5	5.7
4	K9803269-004	0.5	3.3
5	K9803269-005	0.5	3.9
6	K9803269-006	0.5	4.5
Method Blank	K980604-MB	0.5	ND

Approved By: Karen Ressonier Date: 6/5/98

Columbia Analytical Services inc.

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

DATE 5/21/98 PAGE 1 OF 1

PROJECT NAME SSP-SW #

PROJECT MANAGER Tim Todd

COMPANY/ADDRESS Schnitzer Steel/PO Box 10047 Portland OR 97296-0047

FAX 503/286-6948 PHONE 286-6944

SAMPLERS SIGNATURE Tim Todd for Harold Rodinsky

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA/418.1 ☒ OR/418.1 ☐ WA/418.1 ☐	TPH/Gas/BTEX 5030/8015/8020 Gas ☐ BTEX ☐	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☐	TPH/HCID ☐ OR/HCID ☐ WA/HCID ☐	TCLP Metals ☐ VOA ☐ Semi Pest/ VOA ☐ Herb ☐	Metals (total or dissolved) List Below *	Cyanide	OH Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3, (circle)	NH_3-N, COD, Total-P, TKN, TOC (circle)	Total Organic Halides (TOX) 9020 ☐ (AOX) 1650A ☐	TSS		REMARKS
1	5/20	1345	3269-1	H_2O	3					X					X		X			X		
2	↓		2	↓	↓					X					X		X			X		
3			3							X					X		X			X		
4			4							X					X		X			X		
5			5							X					X		X			X		
6			6												X		X			X		

00006

RELINQUISHED BY:	RECEIVED BY:
Signature: Twitt Todd	Signature: [signature]
Printed Name: Tim Todd	Printed Name: [signature]
Firm: SSP	Firm: [signature]
Date/Time: 5/21/98 1600	Date/Time: 5/22/98 1130

TURNAROUND REQUIREMENTS
- ___ 24 hr ___ 48 hr. ___ 5 day
- ___ Standard (10-15 working days)
- ___ Provide Verbal Preliminary Results
- ___ Provide FAX preliminary Results

Requested Report Date ___

REPORT REQUIREMENTS
- ___ I. Routine Report
- ___ II. Report (includes DUP.MS. MSD, as required, may be charged as samples)
- ___ III. Data Validation Report (includes All Raw Data)
- ___ IV. CLP Deliverable Report

INVOICE INFORMATION:
- P.O.# ___
- Bill To ___

SAMPLE RECEIPT:
- Shipping VIA: ___
- Shipping #: ___
- Condition: ___
- Lab No: K9P0 3269

RELINQUISHED BY:	RECEIVED BY:
Signature	Signature
Printed Name	Printed Name
Firm	Firm
Date/Time	Date/Time

SPECIAL INSTRUCTIONS/COMMENTS:

*Total metals = Cu, Pb, Zn

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

SCHN00245705

Columbia Analytical Services inc.

December 31, 1997

Service Request No: K9709131

Tim Todd
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97210

Re: SSP-IT Stormwater Sampling

Dear Tim:

Enclosed are the results of the sample(s) submitted to our laboratory on December 10, 1997. For your reference, these analyses have been assigned our service request number K9709131.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 239.

Respectfully submitted,

Columbia Analytical Services, Inc.

Howard Boorse
Project Chemist

HB/lj

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9709131
Project:	SSP-IT Stormwater Sampling	**Date Collected:**	12/9/97
Sample Matrix:	Water	**Date Received:**	12/10/97
		Date Extracted:	NA

Inorganic Parameters
Units: mg/L (ppm)

	Analyte:	Conductivity (µmhos/cm)	Chemical Oxygen Demand (COD)	pH (units)	Carbon, Total Organic (TOC)	Solids, Total Suspended (TSS)
	EPA Method:	120.1	410.2	150.1	415.1	160.2
	Method Reporting Limit:	2	5	-	0.5	5
	Date Analyzed:	12/16/97	12/17/97	12/11/97	12/26/97	12/16/97
Sample Name	**Lab Code**					
Outfall #7	K9709131-001	114	16	8.87	10.1	452
Outfall #2	K9709131-002	863	358	7.82	110	184
Outfall #3	K9709131-003	561	236	7.63	73.0	96
Outfall #4	K9709131-004	221	7	9.41	5.1	65
Outfall #5	K9709131-005	158	19	8.49	25.6	73
Outfall #6	K9709131-006	679	18	9.98	7.5	101
Method Blank	K9709131-MB	ND	ND	-	ND	ND

Approved By: alp Date: 12/30/97

SASM/120294

69131WET.MR1 - 5Tests 12/30/97

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9709131
Project:	SSP-IT Stormwater Products Co.	**Date Collected:**	12/9/97
Sample Matrix:	Water	**Date Received:**	12/10/97
		Date Extracted:	12/16/97

Total Metals
Units: µg/L (ppb)

		Sample Name:	Outfall #7	Outfall #2	Outfall #3
		Lab Code:	K9709131-001	K9709131-002	K9709131-003
		Date Analyzed:	12/19/97	12/19/97	12/19/97
Analyte	**EPA Method**	**MRL**			
Arsenic	7060A	5	ND	ND	ND
Cadmium	6010A	4	ND	16	11
Chromium	6010A	5	31	41	23
Copper	6010A	10	505	310	267
Lead	6010A	50	263	606	424
Mercury	7470A	0.5	0.8	2.2	1.2
Nickel	6010A	20	ND	48	34
Zinc	6010A	10	627	4470	3210

Approved By: [signature] Date: 12 3 97

3530EPA/102094
09131ICP.EA1 - Sample 12/24/97

0004

SCHN00245708

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT Stormwater Products Co.
Sample Matrix: Water

Service Request: K9709131
Date Collected: 12/9/97
Date Received: 12/10/97
Date Extracted: 12/16/97

Total Metals
Units: µg/L (ppb)

		Sample Name:	Outfall #4	Outfall #5	Outfall #6
		Lab Code:	K9709131-004	K9709131-005	K9709131-006
		Date Analyzed:	12/19/97	12/19/97	12/19/97
Analyte	**EPA Method**	**MRL**			
Arsenic	7060A	5	ND	ND	ND
Cadmium	6010A	4	ND	18	ND
Chromium	6010A	5	24	188	21
Copper	6010A	10	1390	1810	565
Lead	6010A	50	146	1390	115
Mercury	7470A	0.5	ND	4.8	ND
Nickel	6010A	20	ND	113	ND
Zinc	6010A	10	557	3930	277

Approved By: _____ Date: 12 31 97

3530EPA/102094
091311CP.EA1 - Sample(2) 12/23/97

SCHN00245709

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT Stormwater Products Co.
Sample Matrix: Water

Service Request: K9709131
Date Collected: NA
Date Received: NA
Date Extracted: 12/16/97

Total Metals
Units: µg/L (ppb)

		Sample Name:	Method Blank
		Lab Code:	K9709131-MB
		Date Analyzed:	12/19/97
Analyte	**EPA Method**	**MRL**	
Arsenic	7060A	5	ND
Cadmium	6010A	4	ND
Chromium	6010A	5	ND
Copper	6010A	10	ND
Lead	6010A	50	8
Mercury	7470A	0.5	ND
Nickel	6010A	20	ND
Zinc	6010A	10	ND

Approved By: _____ Date: 12/31/97

3530EPA/102094
09131ICP.EA1 - Sample (3) 12/24/97

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT Stormwater Sampling
Sample Matrix: Water

Service Request: K9709131
Date Collected: 12/9/97
Date Received: 12/10/97
Date Extracted: 12/23/97
Date Analyzed: 12/23/97

Oil and Grease
EPA Method 413.1
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
Outfall #7	K9709131-001	5	9
Outfall #2	K9709131-002	5	40
Outfall #3	K9709131-003	5	12
Outfall #4	K9709131-004	5	ND
Outfall #5	K9709131-005	5	26
Outfall #6	K9709131-006	5	ND
Method Blank	K971223-MB	5	ND

Approved By: Nandan Date: 12/24/97

1AMRL/107594
09131PHC.BW1 - 413# 12/22/97

APPENDIX A
LABORATORY QC RESULTS

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9709131
Project:	SSP-IT Stormwater Sampling	**Date Collected:**	12/9/97
Sample Matrix:	Water	**Date Received:**	12/10/97
		Date Extracted:	NA

Duplicate Summary
Inorganic Parameters
Units: mg/L (ppm)

Sample Name: Outfall #7
Lab Code: K9709131-001D

Analyte	EPA Method	MRL	Sample Result	Duplicate Sample Result	Average	Relative Percent Difference
pH	150.1	--	9.98(L1)	10.00	9.99	< 1
Conductivity	120.1	2	114	113	114	< 1
Chemical Oxygen Demand (COD)	410.4	5	7(L2)	7	7	< 1
Solids, Total Suspended (TSS)	160.2	5	452	455	454	< 1
Carbon, Total Organic (TOC)	415.1	0.5	10.1	11.9	11.0	16

L1 Duplicate analysis was performed on Sample Outfall #6; Lab Code K9709131-006.
L2 Duplicate analysis was performed on Sample Outfall #4; Lab Code K9709131-004.

Approved By: _____ Date: 12/30/97

DUP1SEPA/102194
09131WET.MR1 - MetalDup 12/30/97

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT Stormwater Sampling
Sample Matrix: Water

Service Request: K9709131
Date Collected: 12/9/97
Date Received: 12/10/97
Date Extracted: NA

Matrix Spike Summary
Inorganic Parameters
Units: mg/L (ppm)

Sample Name: Outfall #7
Lab Code: K9709131-001MS

Analyte	EPA Method	MRL	Spike Level	Sample Result	Spiked Sample Result	Percent Recovery	CAS Percent Recovery Acceptance Limits
Chemical Oxygen Demand (COD)	410.4	5	100	7(M)	105	98	75-125
Carbon, Total Organic (TOC)	415.1	0.5	50.0	10.1	61.4	103	85-115

M Matrix Spike analysis was performed on Sample Outfall #4; Lab Code K9709131-004.

Approved By: [signature] Date: 12/30/97

M513EPA/102194
09131WET.MR1 - mixedspk 12/30/97

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT Stormwater Products Co.
Sample Matrix: Water

Service Request: K9709131
Date Collected: 12/9/97
Date Received: 12/10/97
Date Extracted: 12/16/97
Date Analyzed: 12/19/97

Duplicate Summary
Total Metals
Units: µg/L (ppb)

Sample Name: Outfall #7
Lab Code: K9709131-001

Analyte	EPA Method	MRL	Sample Result	Duplicate Sample Result	Average	Relative Percent Difference
Arsenic	7060A	5	ND	ND	ND	-
Cadmium	6010A	4	ND	ND	ND	-
Chromium	6010A	5	31	39	35	23
Copper	6010A	10	505	535	520	6
Lead	6010A	50	263	287	275	9
Mercury	7470A	0.5	ND	ND	ND	-
Nickel	6010A	20	ND	ND	ND	-
Zinc	6010A	10	627	667	647	6

Approved By: _____ Date: 12/31/97

DUP1SEPA/102194

09131ICP.EA1 - DUP 12/24/97

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT Stormwater Products Co.
Sample Matrix: Water

Service Request: K9709131
Date Collected: 12/9/97
Date Received: 12/10/97
Date Extracted: 12/16/97
Date Analyzed: 12/19/97

Matrix Spike Summary
Total Metals
Units: µg/L (ppb)

Sample Name: Outfall #7
Lab Code: K9709131-001

Analyte	MRL	Spike Level	Sample Result	Spiked Sample Result	Percent Recovery	CAS Percent Recovery Acceptance Limits
Arsenic	5	40	ND	38	95	75-125
Cadmium	4	50	ND	53	106	75-125
Chromium	5	200	31	235	102	75-125
Copper	10	250	505	794	116	75-125
Lead	50	500	263	773	102	75-125
Mercury	0.5	1	0.8	1.8	100	60-140
Nickel	20	500	ND	505	101	75-125
Zinc	10	500	627	1170	109	75-125

Approved By: _____ Date: 12/24/97

M513/102194
091311CP.EA1 - Spike 12/24/97

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9709131
Project:	SSP-IT Stormwater Sampling	**Date Collected:**	NA
LCS Matrix:	Water	**Date Received:**	NA
		Date Extracted:	12/23/97
		Date Analyzed:	12/23/97

Laboratory Control Sample/Duplicate Laboratory Control Sample Summary
Oil and Grease
EPA Method 413.1
Units: mg/L (ppm)

	True Value		Result		Percent Recovery			
Analyte	**LCS**	**DLCS**	**LCS**	**DLCS**	**LCS**	**DLCS**	**CAS Acceptance Limits**	**Relative Percent Difference**
Oil	50	50	49	50	98	100	85-115	2

Approved By: Nandan Date: 12/24/97

DLCS/032395
09131PHC.BW1 - DLCS 12/23/97

SCHN00245717

Columbia Analytical Services Inc.

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068 DATE 12-9-97 PAGE 1 OF 1

PROJECT NAME SSP-IT Stormwater Sampling
PROJECT MANAGER Tim Todd
COMPANY/ADDRESS 3200 NW Yeon Ave
P.O. Box 10047 • Portland, OR 97210
FAX (503) 286-6948 PHONE (503) 286-6944
SAMPLERS SIGNATURE [signature]

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA/418.1 ☐ OR/418.1 ☐ WA/418.1 ☐	TPH/Gas/BTEX 5030/8015/8020 Gas ☐ BTEX ☐	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☐	TPH/HCID ☐ OR/HCID ☐ WA/HCID ☐	TCLP Metals ☐ VOA ☐ Semi Pest/ VOA ☐ Herb ☐	Metals (total or dissolved) List Below	Cyanide	Cl, Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3, (circle)	NH_3-N (circle) COD Total-P, TKN (TOC)	Total Organic Halides (TOX) 8020 ☐ (AOX) 1650A ☐	TSS EPA Method	Oil & Grease EPA Method 413.1	REMARKS
Outfall #7	12-9-97	1250	1	Water	3												X	X		X	X	
Outfall #2	↓	1200	2	↓	↓												X	X		X	X	
Outfall #3	↓	1230	3	↓	↓												X	X		X	X	
Outfall #4	↓	1240	4	↓	↓												X	X		X	X	
Outfall #5	↓	1215	5	↓	↓												X	X		X	X	
Outfall #6	↓	1220	6	↓	↓												X	X		X	X	

RELINQUISHED BY:	RECEIVED BY:
[signature] Signature	Kimberly Olson Signature
Jim Jakobcik Printed Name	Kimberly Olson Printed Name
J³ & Associates, Inc Firm	CAS Firm
12-9-97 3:30PM Date/Time	10 Dec 97 - 17:45 Date/Time

TURNAROUND REQUIREMENTS
___ 24 hr ___ 48 hr ___ 5 day
X Standard (10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX preliminary Results
Requested Report Date ___

REPORT REQUIREMENTS
___ I. Routine Report
X II. Report (includes DUP, MS, MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O.# ___
Bill To Tim Todd
(Address above)

SAMPLE RECEIPT:
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No: K9709131

RELINQUISHED BY:	RECEIVED BY:
Signature	Signature
Printed Name	Printed Name
Firm	Firm
Date/Time	Date/Time

SPECIAL INSTRUCTIONS/COMMENTS:
Total Metals Analyses:
As, Cd, Cr, Cu, Pb, Hg Ni, Zn
6000 & 7000 Series

pH – EPA Method 150.1
Conductivity – EPA Method 120.1
COD – EPA Method 410.4
TOC – EPA Method 415.1
Oil & Grease – EPA Method 413.1
TSS – EPA Method 160.2

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

SCHN00245718

CITY OF PORTLAND ENVIRONMENTAL SERVICES

Water Pollution Control Laboratory
6543 N. Burlington Ave., Portland, Oregon 97203-5452

Post-it® Fax Note 7671	Date 10/30/98 # of pages ▶ 10
To Tim Todd	From Cloudy Sears
Co./Dept. Schnitzer	Co. BES
Phone # 286-6944	Phone # 823-7859
Fax # 286-6948	Fax #

INSTRUCTIONS: INDUSTRIAL AND COMMERCIAL SURVEY PART I

1. Enter the name of the company, that is the name of the company legally responsible for this facility.

2. Enter the name of the facility, such as the name used on letterhead, correspondence or advertising brochures.

3. Enter the street address where the facility is located.

4. Enter the *mailing* address of the facility, if different from the facility street address above.

5. Enter the name, title, telephone number, and fax number of the person who is most familiar with the facts reported on this form and who can be contacted by City staff. Generally, this person is the facility's maintenance supervisor or engineer.

6. a) Enter the Standard Industrial Classification (SIC) Code Number. SIC codes can sometimes be found on the facility's business license or tax reporting forms. A complete listing of all SIC codes can be found in the *Standard Industrial Classification Manual*. Copies are available at most public libraries.

   b) Enter the number of work shifts operating during normal business operations. Enter the total number of employees working at the facility. An average for the calendar year is acceptable, if there is seasonal fluctuations in the total number.

   c) Circle the days per week that your facility conducts business.

   d) Briefly describe the principle commercial activities, manufacturing or services, performed on-site.

INSTRUCTIONS: INDUSTRIAL AND COMMERCIAL SURVEY PART I

13. Check the appropriate box.

    a) If "Yes," check the appropriate box.

    b) Check the appropriate box.. If "Other," describe. how, where, and by whom the waste is handled for disposal.

14. Check the appropriate box.

    a) If "Yes," check the appropriate box.

    b) Check the appropriate box. If "Other," describe how, where, and by whom the wash water is handled for disposal.

15. Check the appropriate boxes.

16. If you discharge a listed or characteristic hazardous waste subject to the provisions of the Resource Conservation and Recovery Act (RCRA) to the City sewer system, you must complete the RCRA Hazardous Waste Information questionnaire.

    40 CFR [403.12(p)(1) specifies that the Industrial User shall notify the POTW (Publicly Owned Treatment Works) of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261. If the Industrial User discharges more that 100 kilograms of such waste per calendar month to the POTW, the notification shall also contain information to the extent such information is known and readily available to the Industrial User.

    For information about RCRA hazardous waste, contact the Department of Environmental Quality (DEQ) at (503) 229-5615, or (503) 229-5165.

Post-it® Fax Note 7671	Date	# of pages ▶ 7
To Tom Zelenka	From Tim Todd	
Co./Dept.	Co.	
Phone #	Phone #	
Fax #	Fax #	

November 2, 1998

Ms. Cloudy Sears
Industrial Source Control Division
City of Portland Environmental Services
Water Pollution Control Laboratory
6543 North Burlington Avenue
Portland, OR 97203-5452

Re: Industrial and Commercial Environmental Survey – International Terminals, 12005 North Burgard Road

Dear Ms. Sears:

A completed survey for the referenced facility is attached. The information submitted is true, accurate and complete to the best of my knowledge.

After consulting with legal counsel, Schnitzer Steel Products Co. (SSP) has determined that the signatory requirements for industrial user reports are not applicable to this survey. Item 17 in the instructions for the survey references 40 CFR 403.12(l), which refers to paragraphs (b), (d), and (e) of the same section. These paragraphs apply to industrial users subject to categorical pretreatment standards, which SSP is not. Moreover, these provisions do not apply in any way to the referenced "Industrial and Commercial Environmental Survey". It appears that this rule section was either misinterpreted or misrepresented by your agency.

Please contact me at (503) 286-6944 if you have questions.

Sincerely,
Schnitzer Steel Products Co.

Timothy R. Todd
Environmental Administrator

Cc: Charlie Ford, Esq.
Tom Zelenka

CITY OF PORTLAND ENVIRONMENTAL SERVICES

Water Pollution Control Laboratory
6543 N. Burlington Ave., Portland, Oregon 97203-5452

For Industrial Source Control Division Use Only	
Date Postmarked/Received	Date Entered
	Entered By:
Comments:	

INDUSTRIAL AND COMMERCIAL ENVIRONMENTAL SURVEY
Part I

1. Schnitzer Steel Products Co.
(Company Name)

2. International Terminals
(Facility Name)

3. 12005 North Burgard Road
(Facility Address, Street)

Portland (City) Oregon (State) 97203 (Zip Code)

4. PO Box 10047
(Mailing Address, Street/PO Box)

Portland (City) OR (State) 97296 (Zip Code)

5. Provide the name of the person to contact on information contained in this questionnaire:

Tim Todd (Name) (503) 286-6944 (Phone)

Environmental Administrator (Title) 286-6948 (Fax)

6. a) Enter applicable SIC code(s): 5093

b) Enter the number of shifts daily: 1-3 Enter total number of employees 81

c) Circle the days of operation: Sun Mon Tue Wed Thur Fri Sat

d) Provide a brief description of manufacturing or service activities performed at this facility:

Scrap metal processing, marine terminal operations.

INSTRUCTIONS: INDUSTRIAL AND COMMERCIAL SURVEY PART I

7. Check the appropriate box. If you are uncertain whether this facility is connected to the City of Portland's sanitary sewer system, check your water billing statement for sewer charges, or contact the City's Bureau of Buildings at 823-7660 for sewer connection information.

   a) Check the appropriate box.

   b) Enter the approximate month and year for sewer connection.

8. Check the appropriate box. If you are uncertain whether this facility is connected to the City of Portland's water system, check your water billing statement, or contact the City's Water Bureau at 823-7770 for information.

   a) Check the appropriate box. List your account number(s) in order of total volume used with the largest first.

   b) Water Source: List the supplier and your account number(s). List all account numbers related to the water sources. Example: - Powell Valley Road Water District, #001234.

Examples of Other Water Sources: Specify if water is obtained from other sources such as water that is trucked-in, surface water, including any and all water from rivers, streams, ponds, lakes, etc., or well water.

Volume: City of Portland water bills are in units of a hundred cubic feet (ccf) where one ccf (hundred cubic feet) = 748 gallons. Use the following equation for calculating the average gallons per day (gpd) for water supply information:

$$\text{Average gpd} = \frac{\text{Total water usage in the last 12 months (in ccfs)} \times 748}{\text{Total number of operating days in 12 month period}}$$

9. Check the appropriate boxes. If unsure (9c), call the Office of State Fire Marshal, Hazardous Substances Information Hotline, at (503) 378-6835.

10. Check the appropriate box.

    a) Check the appropriate box.

    b) Complete as requested.

11. a) Check the appropriate boxes. Parking lot run-off includes paved and concreted areas, excludes graveled areas. If Other, list all flows *other than* storm water that flow to a storm sewer. A storm sewer is any sewer pipe conveyance not draining to a sewer treatment plant but draining to a creek, stream, river, pond or other surface water.

    b) Check the appropriate boxes and complete as requested. On-site infiltration systems may include, but not limited to, dry wells, soakage trenches, water quality ponds, etc.

12. Check the appropriate box and complete as requested.

7. Is this facility connected to the City of Portland's sanitary sewer system? Yes [X] No [ ]

Sanitary discharges only — No process water.

a) If No, are there plans to connect? Yes [ ] No [ ]

b) If Yes, indicate when (month/year): _____

8. Does this facility receive water or sewer billing statements from the City of Portland? Yes [X] No [ ]

a) If Yes, list the facility's account number(s). If there are *more than three*, list the three with the highest volume of water usage.

0770076032M0165 _____ _____

b) If No, list the water source for this facility and the average daily usage, in gallons per day (gpd).

Water source: _____ Volume: _____

9. a) Do you use or store liquid chemicals in quantities of 25 gallons or more? Yes [X] No [ ]

b) Do you use or store dry chemicals in quantities of 500 pounds or more? Yes [ ] No [X]

c) Are you required to report under Oregon State Fire Marshall requirements? Yes [X] No [ ]

d) Do you use or store materials, chemicals, products, equipment, or waste materials in outside areas? Yes [X] No [ ]

10. Does your facility generate *any* process wastewater excluding domestic wastewater? Yes [X] No [ ]

a) If Yes, is this wastewater discharged to the Portland sewer system? Yes [ ] No [X]

b) If Yes, briefly describe the process wastewater. Cooling water for shredder — water is in recirculating system Volume Estimate: 200 (units) gpm

11. a) Indicate which of the following drains to a storm sewer system:

Parking Lot run-off: [X] Floor Drains: [ ] Roof Drains: [X]

Other (specify): _____

b) If stormwater from this facility does not drain to a Portland sewer system, does the stormwater drain: Directly to a drainage-way [ ] To an on-site infiltration system [ ]

Other (specify): Willamette River — NPDES permit 1200-Z.

12. Does stormwater come into contact with any material handling activities or equipment, raw materials, intermediate products, by-products, waste materials, or industrial machinery at this facility?

Yes [X] No [ ]

If Yes, briefly describe the activities: Scrap metal processing

13. Do you service any vehicles or equipment at this facility? Yes [X] No [ ]

If Yes: a) Is the servicing done by facility staff or by a contracted firm?

By facility staff [X] By contracted firm's staff [ ]

b) Does the waste drain to: Portland sanitary sewer [ ] Dry well [ ]

Storm sewer [ ] 100% Recycled [ ] Collected for off-site disposal [X]

Other (specify): _____

14. Do you clean any vehicles or equipment at this facility? Yes [X] No [ ]

If Yes: a) Is the cleaning done by facility staff or by a contracted firm?

By facility staff [X] By contracted firm's staff [ ]

b) Does the wash water drain to: Portland sanitary sewer [ ] Dry well [ ]

Storm sewer [ ] 100% Recycled [X] Collected for off-site disposal [ ]

Other (specify): _____

15. Does this facility have an oil/water separator or a grease trap on the discharge line? Yes [ ] No [ ]

If Yes, does the oil/water separator or grease trap discharge to:

Portland sanitary sewer [ ] Storm sewer [ ] Don't know [ ] Willamette River

16. Do you discharge EPA Hazardous Waste? Yes [ ] No [X]

If Yes, complete the following:

HAZARDOUS WASTE INFORMATION QUESTIONNAIRE (use additional sheets if necessary)
Name of Waste: _____
EPA Hazardous Waste Number: _____
TYPE OF DISCHARGE
____ Continuous ____ Batch ____ Other _____

If more than 100 kilograms of any hazardous waste per calendar month is discharged to the sewer, please include the following items of information for each Hazardous Waste, to the extent such information is known and readily available.

Hazardous Constituent Information:

Name of Constituent	Mass in Wastestream (this month)	Concentration in Wastestream (this month)	Mass in Wastestream (next 12 months)

INSTRUCTIONS: INDUSTRIAL AND COMMERCIAL SURVEY PART I

17. This form shall be signed by a Responsible Corporate Officer, a general partner or by a duly authorized representative.

40 CFR 403.12(l):
Signatory requirements for industrial user reports. The reports required by paragraphs (b), (d), and (e) of this section shall include the certification statement as set forth in 403.6(a)(2)(ii), and shall be signed as follows:

(1) By a responsible corporate officer, if the Industrial User submitting the reports required by paragraphs (b), (d) and (e) of this section is a corporation. For the purpose of this paragraph, a responsible corporate officer means (I) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

(2) By a general partner or proprietor if the Industrial User submitting the reports required by paragraphs (b), (d) and (e) of this section is a partnership or sole proprietorship respectively.

(3) By a duly authorized representative of the individual designated in paragraph (l)(1) or (l)(2) of this section if:

(i) The authorization is made in writing by the individual described in paragraph (l)(1) or (l)(2);

(ii) The authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the Industrial Discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and

(iii) The written authorization is submitted to the Control Authority.

(4) If an authorization under paragraph (l)(3) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of paragraph (l)(3) of this section must be submitted to the Control Authority prior to or together with any reports to be signed by an authorized.

17. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. [40 CFR 403.6(a)(2)(ii)]

(Print name here)	(Title)
(Signature)	(Phone)
(Date)	

Photocopy the completed survey form for your records and return the original survey to:

Industrial Source Control Division
City of Portland Environmental Services
Water Pollution Control Laboratory
6543 N. Burlington Avenue
Portland, OR 97203-5452

Columbia Analytical Services inc.

December 31, 1997

Service Request No: K9709131

Tim Todd
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97210

Re: SSP-IT Stormwater Sampling

Dear Tim:

Enclosed are the results of the sample(s) submitted to our laboratory on December 10, 1997. For your reference, these analyses have been assigned our service request number K9709131.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 239.

Respectfully submitted,

Columbia Analytical Services, Inc.

Howard Boorse
Project Chemist

HB/lj

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9709131
Project:	SSP-IT Stormwater Sampling	**Date Collected:**	12/9/97
Sample Matrix:	Water	**Date Received:**	12/10/97
		Date Extracted:	NA

Inorganic Parameters
Units: mg/L (ppm)

	Analyte:	Conductivity (µmhos/cm)	Chemical Oxygen Demand (COD)	pH (units)	Carbon, Total Organic (TOC)	Solids, Total Suspended (TSS)
	EPA Method:	120.1	410.2	150.1	415.1	160.2
	Method Reporting Limit:	2	5	-	0.5	5
	Date Analyzed:	12/16/97	12/17/97	12/11/97	12/26/97	12/16/97
Sample Name	**Lab Code**					
Outfall #7	K9709131-001	114	16	8.87	10.1	452
Outfall #2	K9709131-002	863	358	7.82	110	184
Outfall #3	K9709131-003	561	236	7.63	73.0	96
Outfall #4	K9709131-004	221	7	9.41	5.1	65
Outfall #5	K9709131-005	158	19	8.49	25.6	73
Outfall #6	K9709131-006	679	18	9.98	7.5	101
Method Blank	K9709131-MB	ND	ND	-	ND	ND

Approved By: _____ Date: 12/30/97

SASM/120294

09131WET.MR1 - 5Tues 12/30/97

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9709131
Project:	SSP-IT Stormwater Products Co.	**Date Collected:**	12/9/97
Sample Matrix:	Water	**Date Received:**	12/10/97
		Date Extracted:	12/16/97

Total Metals
Units: µg/L (ppb)

		Sample Name:	Outfall #7	Outfall #2	Outfall #3
		Lab Code:	K9709131-001	K9709131-002	K9709131-003
		Date Analyzed:	12/19/97	12/19/97	12/19/97
Analyte	**EPA Method**	**MRL**			
Arsenic	7060A	5	ND	ND	ND
Cadmium	6010A	4	ND	16	11
Chromium	6010A	5	31	41	23
Copper	6010A	10	505	310	267
Lead	6010A	50	263	606	424
Mercury	7470A	0.5	0.8	2.2	1.2
Nickel	6010A	20	ND	48	34
Zinc	6010A	10	627	4470	3210

Approved By: _____ Date: 12 31 97

3530EPA/102094
091311CP.EAI - Sample 12/24/97

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT Stormwater Products Co.
Sample Matrix: Water

Service Request: K9709131
Date Collected: 12/9/97
Date Received: 12/10/97
Date Extracted: 12/16/97

Total Metals
Units: µg/L (ppb)

		Sample Name:	Outfall #4	Outfall #5	Outfall #6
		Lab Code:	K9709131-004	K9709131-005	K9709131-006
		Date Analyzed:	12/19/97	12/19/97	12/19/97
Analyte	**EPA Method**	**MRL**			
Arsenic	7060A	5	ND	ND	ND
Cadmium	6010A	4	ND	18	ND
Chromium	6010A	5	24	188	21
Copper	6010A	10	1390	1810	565
Lead	6010A	50	146	1390	115
Mercury	7470A	0.5	ND	4.8	ND
Nickel	6010A	20	ND	113	ND
Zinc	6010A	10	557	3930	277

Approved By: _____ Date: 12 31 97

3930EPA/102594
091341CP.EA1 - Sample 121 12/24/97

SCHN00245733

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9709131
Project:	SSP-IT Stormwater Products Co.	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA
		Date Extracted:	12/16/97

Total Metals
Units: µg/L (ppb)

		Sample Name:	**Method Blank**
		Lab Code:	K9709131-MB
		Date Analyzed:	12/19/97
Analyte	**EPA Method**	**MRL**	
Arsenic	7060A	5	ND
Cadmium	6010A	4	ND
Chromium	6010A	5	ND
Copper	6010A	10	ND
Lead	6010A	50	8
Mercury	7470A	0.5	ND
Nickel	6010A	20	ND
Zinc	6010A	10	ND

Approved By: _____ Date: 12/31/97

3830EPA/102094
091311CP.EA1 - Sample (3) 12/24/97

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT Stormwater Sampling
Sample Matrix: Water

Service Request: K9709131
Date Collected: 12/9/97
Date Received: 12/10/97
Date Extracted: 12/23/97
Date Analyzed: 12/23/97

Oil and Grease
EPA Method 413.1
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
Outfall #7	K9709131-001	5	9
Outfall #2	K9709131-002	5	40
Outfall #3	K9709131-003	5	12
Outfall #4	K9709131-004	5	ND
Outfall #5	K9709131-005	5	26
Outfall #6	K9709131-006	5	ND
Method Blank	K971223-MB	5	ND

Approved By: Nandan Date: 12/24/97

1AMRL/102394
09131PHC.BW1 - 413# 12/23/97

APPENDIX A
LABORATORY QC RESULTS

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9709131
Project:	SSP-IT Stormwater Sampling	**Date Collected:**	12/9/97
Sample Matrix:	Water	**Date Received:**	12/10/97
		Date Extracted:	NA

Duplicate Summary
Inorganic Parameters
Units: mg/L (ppm)

Sample Name: Outfall #7
Lab Code: K9709131-001D

Analyte	EPA Method	MRL	Sample Result	Duplicate Sample Result	Average	Relative Percent Difference
pH	150.1	--	9.98(L1)	10.00	9.99	< 1
Conductivity	120.1	2	114	113	114	< 1
Chemical Oxygen Demand (COD)	410.4	5	7(L2)	7	7	< 1
Solids, Total Suspended (TSS)	160.2	5	452	455	454	< 1
Carbon, Total Organic (TOC)	415.1	0.5	10.1	11.9	11.0	16

L1 Duplicate analysis was performed on Sample Outfall #6; Lab Code K9709131-006.
L2 Duplicate analysis was performed on Sample Outfall #4; Lab Code K9709131-004.

Approved By: _____ Date: 12/30/97

DUP1SEPA/102194
(9)131WET.MRI - MixedDup 12/30/97

SCHN00245737

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9709131
Project:	SSP-IT Stormwater Sampling	**Date Collected:**	12/9/97
Sample Matrix:	Water	**Date Received:**	12/10/97
		Date Extracted:	NA

Matrix Spike Summary
Inorganic Parameters
Units: mg/L (ppm)

Sample Name: Outfall #7
Lab Code: K9709131-001MS

Analyte	EPA Method	MRL	Spike Level	Sample Result	Spiked Sample Result	Percent Recovery	CAS Percent Recovery Acceptance Limits
Chemical Oxygen Demand (COD)	410.4	5	100	7(M)	105	98	75-125
Carbon, Total Organic (TOC)	415.1	0.5	50.0	10.1	61.4	103	85-115

M Matrix Spike analysis was performed on Sample Outfall #4; Lab Code K9709131-004.

Approved By: [signature] Date: 12/30/97

MS1SEP.e/102194
09131WET.MR1 - mitadspk 12/30/97

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT Stormwater Products Co.
Sample Matrix: Water

Service Request: K9709131
Date Collected: 12/9/97
Date Received: 12/10/97
Date Extracted: 12/16/97
Date Analyzed: 12/19/97

Duplicate Summary
Total Metals
Units: µg/L (ppb)

Sample Name: Outfall #7
Lab Code: K9709131-001

Analyte	EPA Method	MRL	Sample Result	Duplicate Sample Result	Average	Relative Percent Difference
Arsenic	7060A	5	ND	ND	ND	-
Cadmium	6010A	4	ND	ND	ND	-
Chromium	6010A	5	31	39	35	23
Copper	6010A	10	505	535	520	6
Lead	6010A	50	263	287	275	9
Mercury	7470A	0.5	ND	ND	ND	-
Nickel	6010A	20	ND	ND	ND	-
Zinc	6010A	10	627	667	647	6

Approved By: _____ Date: 12/31/97

DUP1SEPA/102194

09131ICP.EA1 - DUP 12/24/97

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT Stormwater Products Co.
Sample Matrix: Water

Service Request: K9709131
Date Collected: 12/9/97
Date Received: 12/10/97
Date Extracted: 12/16/97
Date Analyzed: 12/19/97

Matrix Spike Summary
Total Metals
Units: µg/L (ppb)

Sample Name: Outfall #7
Lab Code: K9709131-001

Analyte	MRL	Spike Level	Sample Result	Spiked Sample Result	Percent Recovery	CAS Percent Recovery Acceptance Limits
Arsenic	5	40	ND	38	95	75-125
Cadmium	4	50	ND	53	106	75-125
Chromium	5	200	31	235	102	75-125
Copper	10	250	505	794	116	75-125
Lead	50	500	263	773	102	75-125
Mercury	0.5	1	0.8	1.8	100	60-140
Nickel	20	500	ND	505	101	75-125
Zinc	10	500	627	1170	109	75-125

Approved By: _____ Date: 12/24/97

MS1S/102194
09131ICP.EA1 - Spike 12/24/97

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9709131
Project:	SSP-IT Stormwater Sampling	**Date Collected:**	NA
LCS Matrix:	Water	**Date Received:**	NA
		Date Extracted:	12/23/97
		Date Analyzed:	12/23/97

Laboratory Control Sample/Duplicate Laboratory Control Sample Summary
Oil and Grease
EPA Method 413.1
Units: mg/L (ppm)

	True Value		Result		Percent Recovery			
Analyte	LCS	DLCS	LCS	DLCS	LCS	DLCS	CAS Acceptance Limits	Relative Percent Difference
Oil	50	50	49	50	98	100	85-115	2

Approved By: Nandan Date: 12/24/97

DLCS/022395
09131PHC.BW1 - DLCS 12/23/97

Columbia Analytical Services™

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

DATE 12-9-97 PAGE 1 OF 1

PROJECT NAME SSP-IT Stormwater Sampling

PROJECT MANAGER Tim Todd

COMPANY/ADDRESS 3200 NW Yeon Ave

P.O. Box 10047 • Portland, OR 97210

FAX (503) 286-6948 PHONE (503) 286-6944

SAMPLERS SIGNATURE [signature]

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA418.1 ☐ OR/418.1 ☐ WA/418.1 ☐	TPH/Gas/BTEX 5030/8015/8020 Gas ☐ BTEX ☐	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☐	TPH/HCID ☐ OR/HCID ☐ WA/HCID ☐	TCLP Metals ☐ VOA ☐ Semi Pest/ VOA ☐ Herb ☐	Metals (total or dissolved) List Below	Cyanide	pH/Cond/Cl, SO_4, PO_4, F, Br NO_2, NO_3, (circle)	NH_3-N, COD (circle) Total-P, TKN, TOC	Total Organic Halides (TOX) 8020 ☐ (AOX) 1650A ☐	TSS EPA Method	Oil & Grease EPA Method 413.1	REMARKS
Outfall #7	12-9-97	1250	1	Water	3												X	X		X	X	
Outfall #2	↓	1200	2	↓	↓												X	X		X	X	
Outfall #3		1230	3														X	X		X	X	
Outfall #4		1240	4														X	X		X	X	
Outfall #5		1215	5														X	X		X	X	
Outfall #6	↓	1220	6	↓	↓												X	X		X	X	

RELINQUISHED BY:	RECEIVED BY:
[signature]	Kimberly Olson
Signature	Signature
Tim Jakobsik	Kimberly Olson
Printed Name	Printed Name
J² & Associates, Inc	CAS
Firm	Firm
12-9-97 3:30PM	10 Dec 97 - 17:45
Date/Time	Date/Time

TURNAROUND REQUIREMENTS
___ 24 hr ___ 48 hr. ___ 5 day
X Standard (10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX preliminary Results
Requested Report Date ___

REPORT REQUIREMENTS
___ I. Routine Report
X II. Report (includes DUP, MS, MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O.# ___
Bill To Tim Todd (Address above)

SAMPLE RECEIPT:
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No. K9709131

RELINQUISHED BY:	RECEIVED BY:
Signature	Signature
Printed Name	Printed Name
Firm	Firm
Date/Time	Date/Time

SPECIAL INSTRUCTIONS/COMMENTS:
Total Metals Analyses:
As, Cd, Cr, Cu, Pb, Hg Ni, Zn
6000 & 7000 Series

pH – EPA Method 150.1
Conductivity – EPA Method 120.1
COD – EPA Method 410.4
TOC – EPA Method 415.1
Oil & Grease – EPA Method 413.1
TSS – EPA Method 160.2

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

SCHN00245742

Columbia Analytical Services INC.

June 10, 1998

Service Request No: K9803269

Tim Todd
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97296-0047

Re: SSP-SW

Dear Tim:

Enclosed are the results of the sample(s) submitted to our laboratory on May 22, 1998. For your reference, these analyses have been assigned our service request number K9803269.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 239.

Respectfully submitted,

Columbia Analytical Services, Inc.

Howard Boorse
Project Chemist

HB/sm

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 360/577-7222 • Fax 360/636-1068

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9803269
Project:	SSP-SW	**Date Collected:**	5/20/98
Sample Matrix:	Water	**Date Received:**	5/22/98
		Date Extracted:	NA

Inorganic Parameters
Units: mg/L (ppm)

Analyte:	pH (units)	Solids, Total Suspended (TSS)
EPA Method:	150.1	160.2
Method Reporting Limit:	-	5
Date Analyzed:	5/22/98	5/27/98

Sample Name	Lab Code		
1	K9803269-001	7.64 (H)	208
2	K9803269-002	7.96 (H)	94
3	K9803269-003	7.74 (H)	360
4	K9803269-004	7.60 (H)	130
5	K9803269-005	7.98 (H)	412
6	K9803269-006	8.16 (H)	270
Method Blank	K9803269-MB	-	ND

H The Sample was received past the recommended hold time.

Approved By: _____ Date: 6/9/98

3ADW/061694
03269WET.LJ1 - 3_Tests 6/9/98

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9803269
Project:	SSP-SW	**Date Collected:**	5/20/98
Sample Matrix:	Water	**Date Received:**	5/22/98
		Date Extracted:	5/27/98

Total Metals
Units: µg/L (ppb)

	Analyte:	**Copper**	**Lead**	**Zinc**
	EPA Method:	6010A	7421	6010A
	Method Reporting Limit:	10	2	10
	Date Analyzed:	6/8/98	5/29/98	6/8/98
Sample Name	**Lab Code**			
1	K9803269-001	624	1060	5720
2	K9803269-002	586	394	2510
3	K9803269-003	4230	456	2100
4	K9803269-004	431	562	1610
5	K9803269-005	801	160	561
6	K9803269-006	203	78	288
Method Blank	K9803269-MB	ND	ND	ND

Approved By: _____ Date: 6/9/98

3AEPA/102694

03269ICP.EA1 - Sample 6/8/98

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9803269
Project:	SSP-SW	**Date Collected:**	5/20/98
Sample Matrix:	Water	**Date Received:**	5/22/98
		Date Extracted:	6/4/98
		Date Analyzed:	6/4/98

Petroleum Hydrocarbons
EPA Method 418.1
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
1	K9803269-001	0.5	12.6
2	K9803269-002	0.5	5.1
3	K9803269-003	0.5	5.7
4	K9803269-004	0.5	3.3
5	K9803269-005	0.5	3.9
6	K9803269-006	0.5	4.5
Method Blank	K980604-MB	0.5	ND

Approved By: Karen Pessoner Date: 6/5/98

1AMRL/102604 03269FHC.CR1 - 1 6/4/98

Page No.:

00005

SCHN00245747

Columbia Analytical Services inc.

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

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DATE 5/21/98 PAGE 1 OF 1

PROJECT NAME SSP-SW #

PROJECT MANAGER Tim Todd

COMPANY/ADDRESS Schnitzer Steel/PO Box 10047 Portland OR 97296-0047

FAX 503/286-6948 PHONE 286-6944

SAMPLERS SIGNATURE Tim Todd for Harold Rodinsky

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA418.1 ☐ OR/418.1 ☐ WA/418.1 ☐	TPH/Gas/BTEX 5030/8015/8020 Gas ☐ BTEX ☐	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☐	TPH/HCID ☐ OR/HCID ☐ WA/HCID ☐	TCLP Metals ☐ VOA ☐ Semi Pest/Herb ☐	Metals (total or dissolved) List Below *	Cyanide	Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3, (circle)	NH_3-N, COD, Total-P, TKN, TOC (circle)	Total Organic Halides (TOX) 9020 ☐ (AOX) 1650A ☐	TSS		REMARKS
1	5/20	1345	3269-1	H_2O	3					X					X		X			X		
2	↓		2	↓	↓					X					X		X			X		
3			3							X					X		X			X		
4			4							X					X		X			X		
5			5							X					X		X			X		
6			6												X		X			X		

00006

RELINQUISHED BY:	RECEIVED BY:
Signature: Twitty Todd	Signature: [signature]
Printed Name: Tim Todd	Printed Name: [signature]
Firm: SSP	Firm: [signature]
Date/Time: 5/21/98 1600	Date/Time: 5/22/98 1130

TURNAROUND REQUIREMENTS
- ___ 24 hr ___ 48 hr. ___ 5 day
- ___ Standard (10-15 working days)
- ___ Provide Verbal Preliminary Results
- ___ Provide FAX preliminary Results

Requested Report Date ___

REPORT REQUIREMENTS
- ___ I. Routine Report
- ___ II. Report (includes DUP.MS. MSD, as required, may be charged as samples)
- ___ III. Data Validation Report (includes All Raw Data)
- ___ IV. CLP Deliverable Report

INVOICE INFORMATION:
- P.O.# ___
- Bill To ___

SAMPLE RECEIPT:
- Shipping VIA: ___
- Shipping #: ___
- Condition: ___
- Lab No: K9P0 3269

RELINQUISHED BY:	RECEIVED BY:
Signature	Signature
Printed Name	Printed Name
Firm	Firm
Date/Time	Date/Time

SPECIAL INSTRUCTIONS/COMMENTS:

*Total metals = Cu, Pb, Zn

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

SCHN00245748

SCHNITZER STEEL PRODUCTS CO.

N. Burgard St. Portland, Oregon 97203
P... ox 10047 Portland, Oregon 97210
Phone 503/286-5771 FAX 503/286-6948

June 30, 1997

Mr. Neil Mullane
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201-4987

Re: Sampling Results for 1996 - 1997 Permit #1200R, File #108103

Dear Mr. Mullane:

Monitoring results for the referenced permit are attached, along with copies of laboratory analytical reports. Due to unusually high river levels, most of the outfalls were submerged during much of the year, and were not accessible for sampling.

In addition to improvements implemented last year, we installed storm water catchbasin filters after the first sampling event, and have contracted with International Mill Service to provide a vacuum sweeper to clean portions of the yard each week.

Please contact me at (503) 286-6944 if you have questions.

Sincerely,
Schnitzer Steel Industries, Inc.

Timothy R. Todd

Timothy R. Todd
Environmental Administrator

Table 1
Stormwater Sampling Results
Schnitzer Steel Industries, Inc.
Portland, Oregon
(mg/L)

Sample Data		Laboratory Results					
Outfall	Date	pH[a]	COD	TOC	Conduct[b]	TSS	TPH
2	11/18/96	8.17	58	32	89	1280	13.5
	5/28/97	7.66	NA[c]	3.5	78	6	<5
3	11/18/96	7.91	21	12	74	304	8.2
	5/28/97	7.77	NA	1.8	71	13	<5
4	11/18/96	8.39	74	51	170	1350	18.0
	5/28/97	9.33	NA	2.7	82	58	<5
5[d]	11/18/96	8.34	170	24	68	860	14.8
6	11/18/96	8.56	31	11	63	368	5.4
	5/28/97	9.33	NA	11.4	152	52	<5

Note:

[a] Results in SU.
[b] Results in umhs/cm.
[c] Not analyzed.
[d] Outfall submerged during 5/28/97 sampling event.

Table 1
Stormwater Sampling Results
Schnitzer Steel Industries, Inc.
Portland, Oregon
(mg/L)

Sample Data		Laboratory Results - Metals							
O/F	Date	As	Cd	Cr	Cu	Pb	Hg	Ni	Zn
2	11/18/96	0.008	0.030	0.209	0.679	1.570	0.004	141	10.4
	5/28/97	<0.005	<0.004	<.005	NA[a]	0.002	<0.0005	<0.02	0.03
3	11/18/96	<0.005	0.004	0.058	0.170	0.318	0.8	0.30	1.45
	5/28/97	<0.005	<0.004	<.005	NA	0.015	<0.0005	<0.02	0.08
4	11/18/96	0.014	0.030	0.300	1.320	2.76	11.8	227	7.87
	5/28/97	<0.005	<0.004	<.005	NA	0.025	<0.0005	<0.02	0.10
5	11/18/96	0.006	<0.004	0.086	0.198	0.461	1.3	0.62	1.27
6	11/18/96	<0.005	<0.004	0.042	0.113	0.285	1.1	0.030	0.72
	5/28/970	0.006	<0.004	0.022	NA	0.036	<0.0005	<0.02	0.11

Note:

[a] Not analyzed.

SCHNITZER STEEL PRODUCTS CO.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 286-5771 Telex 289875 FAX (503) 286-6948

July 17, 1997

Mr. Paul Keiran
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201-4987

Re: Corrected Sampling Results for 1996 - 1997 Permit #1200R, File #108103

Dear Mr. Keiran:

As we discussed during our telephone conversation on July 16, 1997, the tabulated storm water analytical data for mercury submitted in Schnitzer Steel Products Co.'s June 30, 1997, report was inadvertently recorded in the wrong units. A corrected table is attached.

Please accept my apology for any confusion caused by this error. Future submittals will be reviewed more thoroughly. Please contact me at (503) 286-6944 if you have questions.

Sincerely,
Schnitzer Steel Products Co.

Timothy R. Todd

Timothy R. Todd
Environmental Administrator

Cc: Tom Zelenka

Table 1
Revised Storm Water Sampling Results
Schnitzer Steel Industries, Inc.
Portland, Oregon
(mg/L)

Sample Data		Laboratory Results					
Outfall	Date	pH[a]	COD	TOC	Conduct[b]	TSS	TPH
2	11/18/96	8.17	58	32	89	1280	13.5
	5/28/97	7.66	NA[c]	3.5	78	6	<5
3	11/18/96	7.91	21	12	74	304	8.2
	5/28/97	7.77	NA	1.8	71	13	<5
4	11/18/96	8.39	74	51	170	1350	18.0
	5/28/97	7.71	NA	2.7	82	58	<5
5[d]	11/18/96	8.34	170	24	68	860	14.8
6	11/18/96	8.56	31	11	63	368	5.4
	5/28/97	9.33	NA	11.4	152	52	<5

Note:

[a] Results in SU.
[b] Results in umho/cm.
[c] Not analyzed.
[d] Outfall submerged during 5/28/97 sampling event.

Table 1
Revised Storm Water Sampling Results
Schnitzer Steel Industries, Inc.
Portland, Oregon
(mg/L)

Sample Data		Laboratory Results - Metals							
O/E	Date	As	Cd	Cr	Cu	Pb	Hg	Ni	Zn
2	11/18/96	0.008	0.030	0.209	0.679	1.570	0.004	0.141	10.4
	5/28/97	<0.005	<0.004	<.005	NA[a]	0.002	<0.0005	<0.02	0.03
3	11/18/96	<0.005	0.004	0.058	0.170	0.318	0.0008	0.030	1.45
	5/28/97	<0.005	<0.004	<.005	NA	0.015	<0.0005	<0.02	0.08
4	11/18/96	0.014	0.030	0.300	1.320	2.76	0.0118	0.227	7.87
	5/28/97	<0.005	<0.004	<.005	NA	0.025	<0.0005	<0.02	0.10
5	11/18/96	0.006	<0.004	0.086	0.198	0.461	0.0013	0.062	1.27
6	11/18/96	<0.005	<0.004	0.042	0.113	0.285	0.0011	0.030	0.72
	5/28/970	0.006	<0.004	0.022	NA	0.036	<0.0005	<0.02	0.11

Note:

[a] Not analyzed.

Columbia Analytical Services inc.

June 13, 1997

Service Request No: K9703603

Tim Todd
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97210

Re: IT-SW

Dear Tim:

Enclosed are the results of the sample(s) submitted to our laboratory on May 29, 1997. For your reference, these analyses have been assigned our service request number K9703603.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 239.

Respectfully submitted,

Columbia Analytical Services, Inc.

Howard Boorse
Project Chemist

HB/ak

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COLUMBIA ANALYTICAL SERVICES, Inc.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: IT-SW
Sample Matrix: Water

Service Request: K9703603
Date Collected: 5/28/97
Date Received: 5/29/97
Date Extracted: NA

Inorganic Parameters
Units: mg/L (ppm)

Analyte:	pH (units)	Conductivity (µmhos/cm)	Solids, Total Suspended (TSS)	Carbon, Total Organic (TOC)
EPA Method:	150.1	120.1	160.2	415.1
Method Reporting Limit:	-	2	5	0.5
Date Analyzed:	5/29/97	6/4/97	6/4/97	6/10/97
Sample Name / **Lab Code**				
1 / K9703603-001	7.66	78	6	3.5
2 / K9703603-002	7.77	71	13	1.8
3 / K9703603-003	7.71	82	58	2.7
4 / K9703603-004	9.33	152	52	11.4
Method Blank / K9703603-MB	-	ND	ND	ND

Approved By: _____ Date: 6/11/97

4A4M_DA/102194

03603WET.LJ1 - 4Tests 6/11/97

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: IT-SW
Sample Matrix: Water

Service Request: K9703603
Date Collected: 5/28/97
Date Received: 5/29/97
Date Extracted: 6/4/97

Total Metals
Units: µg/L (ppb)

		Sample Name:	1	2	3
		Lab Code:	K9703603-001	K9703603-002	K9703603-003
		Date Analyzed:	6/11/97	6/11/97	6/11/97
Analyte	**EPA Method**	**MRL**			
Arsenic	7060A	5	ND	ND	ND
Cadmium	6010A	4	ND	ND	ND
Chromium	6010A	5	ND	ND	ND
Lead	7421	2	2	15	25
Mercury	7470A	0.5	ND	ND	ND
Nickel	6010A	20	ND	ND	ND
Zinc	6010A	10	27	84	101

Approved By: JC Date: 6/12/97

3S30EPA/102094
03603ICP.JC1 - Sample 6/12/97

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: IT-SW
Sample Matrix: Water

Service Request: K9703603
Date Collected: 5/28/97
Date Received: 5/29/97
Date Extracted: 6/4/97

Total Metals
Units: µg/L (ppb)

		Sample Name:	4	Method Blank
		Lab Code:	K9703603-004	K9703603-MB
		Date Analyzed:	6/11/97	6/11/97
Analyte	**EPA Method**	**MRL**		
Arsenic	7060A	5	6	ND
Cadmium	6010A	4	ND	ND
Chromium	6010A	5	22	ND
Lead	7421	2	36	ND
Mercury	7470A	0.5	ND	ND
Nickel	6010A	20	ND	ND
Zinc	6010A	10	109	ND

Approved By: _____ Date: 6/12/97

3S30EPA/102094
03603ICP JC1 - Sample (2) 6/12/97

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9703603
Project:	IT-SW	**Date Collected:**	5/28/97
Sample Matrix:	Water	**Date Received:**	5/29/97
		Date Extracted:	6/12/97
		Date Analyzed:	6/12/97

Oil and Grease
EPA Method 413.1
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
1	K9703603-001	5	ND
2	K9703603-002	5	ND
3	K9703603-003	5	ND
4	K9703603-004	5	ND
Method Blank	K970612-MB	5	ND

Approved By: MMarthe Date: 6/13/97

1AMRL/102594
03603PHC.BW1 - 413w 6/12/97

Services Inc. 1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 X (360) 636-1068 DATE 5/28/97 PAGE 1 OF 1

PROJECT NAME IT-SW #

PROJECT MANAGER Tim Todd

COMPANY/ADDRESS Schnitzer Steel
P.O. Box 10047
Portland 97210 PHONE 503/286-6944

SAMPLERS SIGNATURE Tim Todd

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA/418.1 ☐ OR/418.1 ☐ WA/418.1 ☐	TPH/Gas/BTEX 5030/8015/8020 Gas ☐ BTEX ☐	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☐	TPH/HCID ☐ OR/HCID ☐ WA/HCID ☐	TCLP Metals ☐ VOA ☐ Semi Pest/ VOA ☐ Herb ☐	Metals Total or dissolved List Below	Cyanide	pH, Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3, (circle)	NH_3-N, COD, Total-P, TKN, TOC (circle)	Total Organic Halides (TOX) 9020 ☐ (AOX) 1650A ☐	OIL & Grease - IR EPA 413.2	TSS 160.2 TOC 415.1	REMARKS
1	5/28	1005	K9703603-1	H_2O	4										X		X			X	X	
2	↓	1025	-2	↓	4										X		X			X	X	
3	↓	1040	-3	↓	4										X		X			X	X	
4	↓	1105	-4	↓	4										X		X			X	X	

RELINQUISHED BY:	RECEIVED BY:
Signature: Tim Todd	Signature: [signature]
Printed Name: Tim Todd	Printed Name: [signature]
Firm: SSI	Firm: [signature]
Date/Time: 5/28/97 1410	Date/Time: 5/29/97 0800

TURNAROUND REQUIREMENTS
___ 24 hr ___ 48 hr. ___ 5 day
X Standard (10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX preliminary Results
Requested Report Date ___

REPORT REQUIREMENTS
___ I. Routine Report
___ II. Report (includes DUP.MS. MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O.# ___
Bill To ___

SAMPLE RECEIPT:
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No: K9703603

RELINQUISHED BY:	RECEIVED BY:
Signature	Signature
Printed Name	Printed Name
Firm	Firm
Date/Time	Date/Time

SPECIAL INSTRUCTIONS/COMMENTS:
Total metals: As, Cd, Cr, Pb, Hg, Ni, Zn

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

SCHN00245761

Columbia Analytical Services INC.

December 11, 1996

Service Request No.: K9607527

Tim Todd
Schnitzer Steel Products Company
P. O. Box 10047
Portland, OR 97210

Re: **SSI Stormwater Sampling**

Dear Tim:

Enclosed are the results of the sample(s) submitted to our laboratory on November 20, 1996. For your reference, these analyses have been assigned our service request number K9607527.

All analyses were performed consistent with our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 239.

Respectfully submitted,

Columbia Analytical Services, Inc.

Lynda Huckestein for

Howard Boorse
Project Chemist

HB/td

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 360/577-7222 • Fax 360/636-1068

COLUMBIA ANALYTICAL SERVICES, Inc.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9607527
Project:	SSI Stormwater Sampling	**Date Collected:**	11/18/96
Sample Matrix:	Water	**Date Received:**	11/20/96
		Date Extracted:	NA

Inorganic Parameters
Units: mg/L (ppm)

	Analyte:	pH (units)	Conductivity (µmhos/cm)	Chemical Oxygen Demand (COD)	Solids, Total Suspended (TSS)	Carbon, Total Organic (TOC)
	EPA Method:	9040A	120.1	410.4	160.2	415.1
	Method Reporting Limit:	-	2	20	5	0.5
	Date Analyzed:	11/21/96	11/26/96	12/4/96	11/23/96	12/5/96
Sample Name	**Lab Code**					
SSI-SW-1	K9607527-001	8.17	89	58	1280	32
SSI-SW-2	K9607527-002	7.91	74	21	304	12
SSI-SW-3	K9607527-003	8.39	170	74	1350	51
SSI-SW-4	K9607527-004	8.34	68	170	860	24
SSI-SW-5	K9607527-005	8.56	63	31	368	11
Method Blank	K9607527-MB	-	ND	ND	ND	ND

Approved By: M Thompson Date: 12-10-96

5A5M/120294

07527WET.LJ1 - 5Tests 12/10/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSI Stromwater Sampling
Sample Matrix: Water

Service Request: K9607527
Date Collected: 11/18/96
Date Received: 11/20/96
Date Extracted: 11/27/96

Total Metals
Units: µg/L (ppb)

		Sample Name:	SSI-SW-1	SSI-SW-2	SSI-SW-3
		Lab Code:	K9607527-001	K9607527-002	K9607527-003
		Date Analyzed:	12/3/96	12/3/96	12/3/96
Analyte	**EPA Method**	**MRL**			
Arsenic	7060	5	8	ND	14
Cadmium	6010A	4	30	4	30
Chromium	6010A	5	209	58	300
Copper	6010A	10	679	170	1320
Lead	6010A	50	1570	318	2760
Mercury	7470	0.5	4.0	0.8	11.8
Nickel	6010A	20	141	30	227
Zinc	6010A	10	10400	1450	7870

Approved By: _____ Date: 12/6/96

3S30EPA/102094
07527ICP.JC1 - Sample 12/6/96

SCHN00245765

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSI Stromwater Sampling
Sample Matrix: Water

Service Request: K9607527
Date Collected: 11/18/96
Date Received: 11/20/96
Date Extracted: 11/27/96

Total Metals
Units: µg/L (ppb)

		Sample Name:	SSI-SW-4	SSI-SW-5	Method Blank
		Lab Code:	K9607527-004	K9607527-005	K9607527-MB
		Date Analyzed:	12/3/96	12/3/96	12/3/96
Analyte	**EPA Method**	**MRL**			
Arsenic	7060	5	6	ND	ND
Cadmium	6010A	4	ND	ND	ND
Chromium	6010A	5	86	42	ND
Copper	6010A	10	198	113	ND
Lead	6010A	50	461	285	ND
Mercury	7470	0.5	1.3	1.1	ND
Nickel	6010A	20	62	30	ND
Zinc	6010A	10	1270	718	ND

Approved By: JC Date: 12/6/96

3S30EPA/102094
075271CP.JC1 - Sample (2) 12/6/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9607527
Project:	SSI Stormwater Sampling	**Date Collected:**	11/18/96
Sample Matrix:	Water	**Date Received:**	11/20/96
		Date Extracted:	12/9/96
		Date Analyzed:	12/9/96

Oil and Grease
EPA Method 413.2
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
SSI-SW-1	K9607527-001	0.5	13.5
SSI-SW-2	K9607527-002	0.5	8.2
SSI-SW-3	K9607527-003	0.5	18.0
SSI-SW-4	K9607527-004	0.5	14.8
SSI-SW-5	K9607527-005	0.5	5.4
Method Blank	K961209-MB	0.5	ND

Approved By: Lorna E Portwood Date: 12/9/96

1AMRL/102594
07527PHC.LL1 - 418og 12/9/96

APPENDIX A

LABORATORY QC RESULTS

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9607527
Project:	SSI Stormwater Sampling	**Date Collected:**	11/18/96
Sample Matrix:	Water	**Date Received:**	11/20/96
		Date Extracted:	NA

Duplicate Summary
Inorganic Parameters
Units: mg/L (ppm)

Sample Name: SSI-SW-1
Lab Code: K9607527-001D

Analyte	EPA Method	MRL	Sample Result	Duplicate Sample Result	Average	Relative Percent Difference
pH (units)	9040A	--	8.17	8.35	8.26	2
Conductivity (μmhos/cm)	120.1	2	89	89	89	< 1
Chemical Oxygen Demand (COD)	410.4	20	58	68	63	16
Solids, Total Suspended (TSS)	160.2	5	860 (L)	876	868	2
Carbon, Total Organic (TOC)	415.1	0.5	32	33	32	3

L Duplicate analysis was performed on Sample SSI-SW-4; Lab Code K9607527-004.

Approved By: M Thompson Date: 12-10-96

DUP1SEPA/102194
07527WET.LJ1 - MixedDup 12/10/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSI Stormwater Sampling
Sample Matrix: Water

Service Request: K9607527
Date Collected: 11/18/96
Date Received: 11/20/96
Date Extracted: NA

Matrix Spike Summary
Inorganic Parameters
Units: mg/L (ppm)

Sample Name: SSI-SW-1
Lab Code: K9607527-001MS

Analyte	EPA Method	MRL	Spike Level	Sample Result	Spiked Sample Result	Percent Recovery	CAS Percent Recovery Acceptance Limits
Chemical Oxygen Demand (COD)	410.4	20	1000	58	1100	110	75-125
Carbon, Total Organic (TOC)	415.1	0.5	25.0	32	170	110	85-115

Approved By: M Thompson Date: 12-10-96

MS1SEPA/102194
07527WET.LJ1 - mixedspk 12/10/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSI Stromwater Sampling
Sample Matrix: Water

Service Request: K9607527
Date Collected: 11/18/96
Date Received: 11/20/96
Date Extracted: 11/27/96
Date Analyzed: 12/3/96

Duplicate Summary
Total Metals
Units: µg/L (ppb)

Sample Name: SSI-SW-1
Lab Code: K9607527-001

Analyte	EPA Method	MRL	Sample Result	Duplicate Sample Result	Average	Relative Percent Difference
Arsenic	7060	5	8	9	8	12
Cadmium	6010A	4	30	28	29	7
Chromium	6010A	5	209	207	208	<1
Copper	6010A	10	679	672	676	1
Lead	6010A	50	1570	1560	1560	<1
Mercury	7470	0.5	4.0	4.1	4.0	2
Nickel	6010A	20	141	131	136	7
Zinc	6010A	10	10400	10300	10400	<1

Approved By: JC Date: 12/6/96

DUP1SEPA/102194

07527ICP.JC1 - DUP 12/6/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSI Stromwater Sampling
Sample Matrix: Water

Service Request: K9607527
Date Collected: 11/18/96
Date Received: 11/20/96
Date Extracted: 11/27/96
Date Analyzed: 12/3/96

Matrix Spike Summary
Total Metals
Units: µg/L (ppb)

Sample Name: SSI-SW-1
Lab Code: K9607527-001

Analyte	MRL	Spike Level	Sample Result	Spiked Sample Result	Percent Recovery	CAS Percent Recovery Acceptance Limits
Arsenic	5	40	8	35	68(X)	75-125
Cadmium	4	50	30	78	96	75-125
Chromium	5	200	209	419	105	75-125
Copper	10	250	679	930	100	75-125
Lead	50	500	1570	2040	94	75-125
Mercury	0.5	1	4.0	5.0	100	60-140
Nickel	20	500	141	663	104	75-125
Zinc	10	500	10400	10800	80	75-125

Approved By: JC Date: 12/10/96

MS1S/102194
07527ICP.JC1 - Spike 12/6/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9607527
Project:	SSI Stormwater Sampling	**Date Collected:**	NA
LCS Matrix:	Water	**Date Received:**	NA
		Date Extracted:	12/9/96
		Date Analyzed:	12/9/96

Laboratory Control Sample/Duplicate Laboratory Control Sample Summary
Oil and Grease
EPA Method 413.2
Units: mg/L (ppm)

	True Value		Result		Percent Recovery			
Analyte	LCS	DLCS	LCS	DLCS	LCS	DLCS	CAS Acceptance Limits	**Relative Percent Difference**
Oil	20	20	19.4	20.6	97	103	72-111	6

Approved By: Loren E Portwood Date: 12/9/96

DLCS/102194
07527PHC.LL1 - 418sDLCS 12/9/96

Columbia Analytical Services Inc.

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

DATE 11-20-96 PAGE 1 OF 1

PROJECT NAME SSI - Stormwater Sampling

PROJECT MANAGER Tim Todd

COMPANY/ADDRESS 3200 NW Yeon Avenue
P.O. Box 10047 · Portland, Oregon
97210 PHONE (503) 286-6944

SAMPLERS SIGNATURE Timothy R. Todd

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA/418.1 ☐ OR/418.1 ☐ WA/418.1 ☐	TPH/Gas/BTEX 5030/8015/8020 Gas ☐ BTEX ☐	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☐	TPH/HCID ☐ OR/HCID ☐ WA/HCID ☐	TCLP Metals ☐ VOA ☐ Semi Pest/ VOA ☐ Herb ☐	Metals (total or dissolved) List Below	Cyanide	pH/Cond. Cl, SO_4, PO_4, F, Br, NO_2, NO_3, (circle)	NH_3-N, COD, Total-P, TKN, TOC (circle) EPA 410.4	Total Organic Halides (TOX) 9020 ☐ (AOX) 1650A ☐	Oil and Grease (TRY) EPA 413.2	Total Organic Carbon (EPA 415.1)	Total Suspended Solids EPA 160.2	REMARKS
SSI-SW-1	11-18-96	1315	7527-1	Water	4										X		X	X		X	X		
SSI-SW-2	11-18-96	1345	2	Water	4										X		X	X		X	X		
SSI-SW-3	11-18-96	1415	3	Water	4										X		X	X		X	X		
SSI-SW-4	11-18-96	1445	4	Water	4										X		X	X		X	X		
SSI-SW-5	11-18-96	1515	5	Water	4										X		X	X		X	X		

RELINQUISHED BY:	RECEIVED BY:
Timothy R. Todd	[signature]
Signature	Signature
Tim Todd	[signature]
Printed Name	Printed Name
Schnitzer Steel Products Co.	
Firm	Firm
11-20-96	11/21/96 730
Date/Time	Date/Time

TURNAROUND REQUIREMENTS
___ 24 hr ___ 48 hr. ___ 5 day
X Standard (10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX preliminary Results
Requested Report Date ___

REPORT REQUIREMENTS
___ I. Routine Report
X II. Report (includes DUP.MS. MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O.# ___
Bill To ___

SAMPLE RECEIPT:
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No: K9607527

RELINQUISHED BY:	RECEIVED BY:
Signature	Signature
Printed Name	Printed Name
Firm	Firm
Date/Time	Date/Time

SPECIAL INSTRUCTIONS/COMMENTS:
Total Metals Analyses:
As, Cd, Cr, Cu, Pb, Hg, Ni, Zn
EPA Method 200 Series

pH - EPA Method 9040
Total Suspended Solids - EPA Method 160.2
Conductivity - EPA Method 120.1
COD - EPA Method 410.4
TOC - EPA Method 415.1
Oil & Grease - EPA Method 413.2

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

SCHN00245774

00013

Columbia Analytical Services Inc.

December 16, 1996

Service Request No.: K9607689

Tim Todd
Schnitzer Steel Products Company
P. O. Box 10047
Portland, OR 97210

Re: **SSI-SW**

Dear Tim:

Enclosed are the results of the sample(s) submitted to our laboratory on November 27, 1996. For your reference, these analyses have been assigned our service request number K9607689.

All analyses were performed consistent with our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 239.

Respectfully submitted,

Columbia Analytical Services, Inc.

Howard Boorse
Project Chemist

HB/td

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 360/577-7222 • Fax 360/636-1068

COLUMBIA ANALYTICAL SERVICES, Inc.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
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ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

acronlst.lj/12/29/94

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9607689
Project:	SSI-SW	**Date Collected:**	11/27/96
Sample Matrix:	Water	**Date Received:**	11/27/96
		Date Extracted:	NA

Inorganic Parameters
Units: mg/L (ppm)

Analyte:		**Chemical Oxygen Demand (COD)**	**Solids, Total Suspended (TSS)**	**Carbon, Total Organic (TOC)**
EPA Method:		410.4	160.2	415.1
Method Reporting Limit:		5	5	0.5
Date Analyzed:		12/10/96	12/3/96	12/7/96
Sample Name	**Lab Code**			
SSI-SW-0	K9607689-001	210	210	46
SSI-SW-6	K9607689-002	620	1660	33
SSI-SW-7	K9607689-003	120	168	20
SSI-SW-8	K9607689-004	210	396	14
SSI-SW-9	K9607689-005	130	94	18
SSI-SW-10	K9607689-006	170	118	40
SSI-SW-11	K9607689-007	300	1050	83
SSI-SW-13	K9607689-008	320	56	22
Method Blank	K9607689-MB	ND	ND	ND

Approved By: _____ Date: 12/16/96

3ADW/061694
07689WET.LJ1 - 3_Tests 12/16/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSI-SW
Sample Matrix: Water

Service Request: K9607689
Date Collected: 11/27/96
Date Received: 11/27/96
Date Extracted: 12/3/96

Total Metals
Units: µg/L (ppb)

		Sample Name:	SSI-SW-0	SSI-SW-6	SSI-SW-7
		Lab Code:	K9607689-001	K9607689-002	K9607689-003
		Date Analyzed:	12/9/96	12/9/96	12/9/96
Analyte	**EPA Method**	**MRL**			
Arsenic	206.2	5	ND	ND	5
Cadmium	200.7A	4	13	11	ND
Chromium	200.7A	5	32	229	65
Copper	200.7A	10	153	544	277
Lead	200.7A	50	354	1470	756
Mercury	245.1	0.5	1.2	4.2	1.9
Nickel	200.7A	20	42	103	35
Zinc	200.7A	10	3530	2790	1250

Approved By: JC Date: 12/11/96

3S30BPA/102094
07689ICP.JC1 - Sample 12/11/96

SCHN00245778

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSI-SW
Sample Matrix: Water

Service Request: K9607689
Date Collected: 11/27/96
Date Received: 11/27/96
Date Extracted: 12/3/96

Total Metals
Units: µg/L (ppb)

		Sample Name:	SSI-SW-8	SSI-SW-9	SSI-SW-10
		Lab Code:	K9607689-004	K9607689-005	K9607689-006
		Date Analyzed:	12/9/96	12/9/96	12/9/96
Analyte	**EPA Method**	**MRL**			
Arsenic	206.2	5	5	ND	7
Cadmium	200.7A	4	7	5	ND
Chromium	200.7A	5	145	24	82
Copper	200.7A	10	357	140	373
Lead	200.7A	50	726	214	699
Mercury	245.1	0.5	1.9	0.7	5.3
Nickel	200.7A	20	57	78	50
Zinc	200.7A	10	1730	439	900

Approved By: JC Date: 12/11/96

3S30EPA/102094
07689ICP.JC1 - Sample (2) 12/11/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSI-SW
Sample Matrix: Water

Service Request: K9607689
Date Collected: 11/27/96
Date Received: 11/27/96
Date Extracted: 12/3/96

Total Metals
Units: µg/L (ppb)

		Sample Name:	SSI-SW-11	SSI-SW-13	Method Blank
		Lab Code:	K9607689-007	K9607689-008	K9607689-MB
		Date Analyzed:	12/9/96	12/9/96	12/9/96
Analyte	**EPA Method**	**MRL**			
Arsenic	206.2	5	11	9	ND
Cadmium	200.7A	4	8	ND	ND
Chromium	200.7A	5	666	68	ND
Copper	200.7A	10	756	337	ND
Lead	200.7A	50	1510	360	ND
Mercury	245.1	0.5	2.4	3.5	ND
Nickel	200.7A	20	96	33	ND
Zinc	200.7A	10	2240	546	ND

Approved By: JC Date: 12/11/96

3S30EPA/102094
07689ICP.JC1 - Sample (3) 12/11/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSI-SW
Sample Matrix: Water

Service Request: K9607689
Date Collected: 11/27/96
Date Received: 11/27/96
Date Extracted: 12/11/96
Date Analyzed: 12/11/96

Oil and Grease
EPA Method 413.2
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
SSI-SW-0	K9607689-001	0.5	7.1
SSI-SW-6	K9607689-002	0.5	20.1
SSI-SW-7	K9607689-003	0.5	3.0
SSI-SW-8	K9607689-004	0.5	10.1
SSI-SW-9	K9607689-005	0.5	11.5
SSI-SW-10	K9607689-006	0.5	4.3
SSI-SW-11	K9607689-007	0.5	6.4
SSI-SW-13	K9607689-008	0.5	4.7
Method Blank	K961211-MB	0.5	ND

Approved By: Shawn Ruth Date: 12/13/96

1AMRL/102594
07689PHC.LL1 - 418og 12/12/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSI-SW
Sample Matrix: Water

Service Request: K9607689
Date Collected: 11/27/96
Date Received: 11/27/96
Date Extracted: NA

Duplicate Summary
Inorganic Parameters
Units: mg/L (ppm)

Sample Name: SSI-SW-0
Lab Code: K9607689-001D

Analyte	EPA Method	MRL	Sample Result	Duplicate Sample Result	Average	Relative Percent Difference
Chemical Oxygen Demand (COD)	410.4	5	210	210	210	< 1
Solids, Total Suspended (TSS)	160.2	5	210	224	217	6
Carbon, Total Organic (TOC)	415.1	0.5	46	48	47	4

Approved By: _____ Date: 12/16/96

DUP1SEPA/102194
07689WET.LJ1 - MixedDup 12/16/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSI-SW
Sample Matrix: Water

Service Request: K9607689
Date Collected: 11/27/96
Date Received: 11/27/96
Date Extracted: NA

Matrix Spike Summary
Inorganic Parameters
Units: mg/L (ppm)

Sample Name: SSI-SW-0
Lab Code: K9607689-001MS

Analyte	EPA Method	MRL	Spike Level	Sample Result	Spiked Sample Result	Percent Recovery	CAS Percent Recovery Acceptance Limits
Chemical Oxygen Demand (COD)	410.4	5	1000	210	1200	99	75-125
Carbon, Total Organic (TOC)	415.1	0.5	250	46	280	94	85-115

Approved By: _____ Date: 12/16/96

MS1SEPA/102194
07689WET.LJ1 - mixedspk 12/16/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSI-SW
Sample Matrix: Water

Service Request: K9607689
Date Collected: 11/27/96
Date Received: 11/27/96
Date Extracted: 12/3/96
Date Analyzed: 12/9/96

Duplicate Summary
Total Metals
Units: µg/L (ppb)

Sample Name: SSI-SW-0
Lab Code: K9607689-001

Analyte	EPA Method	MRL	Sample Result	Duplicate Sample Result	Average	Relative Percent Difference
Arsenic	206.2	5	ND	6	NC	NC
Cadmium	200.7A	4	13	12	12	8
Chromium	200.7A	5	32	32	32	<1
Copper	200.7A	10	153	149	151	3
Lead	200.7A	50	354	357	356	<1
Mercury	245.1	0.5	1.2	1.2	1.2	<1
Nickel	200.7A	20	42	44	43	5
Zinc	200.7A	10	3530	3450	3490	2

Approved By: _____ Date: 12/11/96

DUP1SEPA/102194

07689ICP.JC1 - DUP 12/11/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSI-SW
Sample Matrix: Water

Service Request: K9607689
Date Collected: 11/27/96
Date Received: 11/27/96
Date Extracted: 12/3/96
Date Analyzed: 12/9/96

Matrix Spike Summary
Total Metals
Units: µg/L (ppb)

Sample Name: SSI-SW-0
Lab Code: K9607689-001

Analyte	MRL	Spike Level	Sample Result	Spiked Sample Result	Percent Recovery	CAS Percent Recovery Acceptance Limits
Arsenic	5	40	ND	41	102	75-125
Cadmium	4	50	13	61	96	75-125
Chromium	5	200	32	233	100	75-125
Copper	10	250	153	398	98	75-125
Lead	50	500	354	840	98	75-125
Mercury	0.5	1	1.2	2.1	90	60-140
Nickel	20	500	42	535	99	75-125
Zinc	10	500	3530	3950	84	75-125

Approved By: JC Date: 12/11/96

MS1S/102194
07689ICP.JC1 - Spike 12/11/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9607689
Project:	SSI-SW	**Date Collected:**	NA
LCS Matrix:	Water	**Date Received:**	NA
		Date Extracted:	12/11/96
		Date Analyzed:	12/11/96

Laboratory Control Sample/Duplicate Laboratory Control Sample Summary
Oil and Grease
EPA Method 413.2
Units: mg/L (ppm)

	True Value		Result		Percent Recovery			
Analyte	LCS	DLCS	LCS	DLCS	LCS	DLCS	CAS Acceptance Limits	Relative Percent Difference
Oil	20	20	18.6	19.0	93	95	82-108	2

Approved By: Raven Smith Date: 12/13/96

DLCS/102194
07689PHC.LL1 - 418wDLCS 12/12/96

Columbia Analytical Services Inc.

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

DATE 11/27/96 PAGE 1 OF 1

PROJECT NAME SSI-SW #

PROJECT MANAGER Tim Todd

COMPANY/ADDRESS P O Box 10047
Portland, OR 97210

PHONE 503/286-9944

SAMPLERS SIGNATURE Timothy R. Todd

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA418.1 ☐ OR/418.1 ☐ WA/418.1 ☐	TPH/Gas/BTEX 5030/8015/8020 Gas ☐ BTEX ☐	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☐	TPH/HCID ☐ OR/HCID ☐ WA/HCID ☐	TCLP Metals ☐ VOA ☐ Semi Pest/ VOA ☐ Herb ☐	Metals (total or dissolved) * List Below	Cyanide	pH, Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3 (circle)	NH_3-N, COD, Total-P, TKN, TOC (circle) EPA 410.4	Total Organic Halides (TOX) 9020 ☐ (AOX) 1650A ☐	O&G & Grease - IR - EPA 413. TOC - EPA 415.1	TSS - EPA 160.2	REMARKS
SSI-SW-0	11/27	0835		H_2O	4										X			X		X	X	
SSI-SW-6		0850													X			X		X	X	
SSI-SW-7		0905													X			X		X	X	
SSI-SW-8		0910													X			X		X	X	
SSI-SW-9		0920													X			X		X	X	
SSI-SW-10		0945													X			X		X	X	
SSI-SW-11		0948													X			X		X	X	
SSI-SW-13		1000													X			X		X	X	

RELINQUISHED BY:
Signature: Timothy R. Todd
Printed Name: Timothy Todd
Firm: Schnitzer Steel
Date/Time: 11/27/

RECEIVED BY:
Signature
Printed Name
Firm
Date/Time

TURNAROUND REQUIREMENTS
___ 24 hr ___ 48 hr. ___ 5 day
X Standard (10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX preliminary Results
Requested Report Date ___

REPORT REQUIREMENTS
X I. Routine Report
X II. Report (includes DUP.MS. MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O.# ___
Bill To ___

SAMPLE RECEIPT:
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No: K96-7689

RELINQUISHED BY:
Signature
Printed Name
Firm
Date/Time

RECEIVED BY:
Signature
Printed Name
Firm
Date/Time

SPECIAL INSTRUCTIONS/COMMENTS:
* Total metals = As, Cd, Cr, Cu, Pb, Hg, Ni, Zn
Method 200 series

TSS = EPA method 160.2 TOC = EPA method 415.1
COD = EPA method 120.1 O&G = EPA method 413.2

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

SCHN00245787

Columbia Analytical Services inc.

November 5, 1996

Service Request No: K9606885

Tim Todd
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97210

Re: SSP Project

Dear Tim:

Enclosed are the results of the sample(s) submitted to our laboratory on October 28, 1996. For your reference, these analyses have been assigned our service request number K9606885.

All analyses were performed consistent with our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 239.

Respectfully submitted,

Columbia Analytical Services, Inc.

Howard Boorse
Project Chemist

HB/amy

COLUMBIA ANALYTICAL SERVICES, Inc.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Steel Products Co.	**Service Request No.:**	K9606885
Project:	SSP	**Date Received:**	10/28/96
Sample Matrix:	Soil		

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of Columbia Analytical Services, Inc. (CAS). This report contains analytical results for sample(s) designated for Tier I data deliverables. When appropriate to the method, method blank results have been reported with each analytical test. Surrogate recoveries have been reported for all applicable organic analyses.

All EPA recommended holding times have been met for analyses in this sample delivery group.

The following difficulties were experienced during analysis of this batch:

The surrogate recovery for EPA Method 8015M in samples SS2, SS3, SS4 and SS5 were not calculated. The analysis of these samples required a dilution which resulted in a surrogate concentration below the Method Reporting Limit (MRL). No further corrective action was taken.

Approved by _____ Date 1-6-97

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Soil

Service Request: K9606885
Date Collected: 10/25/96
Date Received: 10/28/96

Total Solids

Prep Method: NONE
Analysis Method: 160.3M
Test Notes:

Units: PERCENT
Basis: NA

Sample Name	Lab Code	Date Analyzed	Result	Result Notes
SED1-675	K9606885-001	10/29/96	39.9	
SED2-500	K9606885-002	10/29/96	37.6	
SED3-100	K9606885-003	10/29/96	64.6	
SS1	K9606885-004	10/29/96	48.0	
SS2	K9606885-005	10/29/96	63.4	
SS3	K9606885-006	10/29/96	67.9	
[illegible]4	K9606885-007	10/29/96	62.6	
[illegible]5	K9606885-008	10/29/96	52.5	

Approved By: _____ Date: 10/30/96

Total Solids/060595

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Soil

Service Request: K9606885
Date Collected: 10/25/96
Date Received: 10/28/96
Date TCLP Performed: 11/1/96
Date Extracted: 11/4/96

Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

			Sample Name:	SED1-675	SED2-500	SED3-100
			Lab Code:	K9606885-001	K9606885-002	K9606885-003
			Date Analyzed:	11/4/96	11/4/96	11/4/96
Analyte	**EPA Method**	**MRL**	**Regulatory Limit***			
Arsenic	3010A/6010A	0.1	5	ND	ND	ND
Barium	3010A/6010A	0.5	100	ND	ND	ND
Cadmium	3010A/6010A	0.01	1	ND	ND	ND
Chromium	3010A/6010A	0.01	5	ND	ND	ND
Lead	3010A/6010A	0.05	5	ND	ND	ND
Mercury	7470	0.001	0.2	ND	ND	ND
Selenium	3010A/6010A	0.1	1	ND	ND	ND
Silver	3010A/6010A	0.01	5	ND	ND	ND

* From 40 CFR Part 261, et al., and *Federal Register*, March 29, 1990 and June 29, 1990.

Approved By: EMA Date: 11/4/96

TCLP/102194

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Soil

Service Request: K9606885
Date Collected: 10/25/96
Date Received: 10/28/96
Date TCLP Performed: 11/1/96
Date Extracted: 11/4/96

Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

			Sample Name:	SS1	SS2	SS3
			Lab Code:	K9606885-004	K9606885-005	K9606885-006
			Date Analyzed:	11/4/96	11/4/96	11/4/96
Analyte	**EPA Method**	**MRL**	**Regulatory Limit***			
Arsenic	3010A/6010A	0.1	5	ND	ND	0.06
Barium	3010A/6010A	0.5	100	0.8	1.1	0.9
Cadmium	3010A/6010A	0.01	1	ND	ND	ND
Chromium	3010A/6010A	0.01	5	ND	ND	0.01
Lead	3010A/6010A	0.05	5	ND	ND	ND
Mercury	7470	0.001	0.2	ND	ND	ND
Selenium	3010A/6010A	0.1	1	ND	ND	ND
Silver	3010A/6010A	0.01	5	ND	ND	ND

* From 40 CFR Part 261, et al., and *Federal Register*, March 29, 1990 and June 29, 1990.

Approved By: Emma Date: 11/4/96

TCLP/102194

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Soil

Service Request: K9606885
Date Collected: 10/25/96
Date Received: 10/28/96
Date TCLP Performed: 11/1/96
Date Extracted: 11/4/96

Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

			Sample Name:	SS4	SS5	Method Blank
			Lab Code:	K9606885-007	K9606885-008	K9606885-MB
			Date Analyzed:	11/4/96	11/4/96	11/4/96
Analyte	**EPA Method**	**MRL**	**Regulatory Limit***			
Arsenic	3010A/6010A	0.1	5	ND	ND	ND
Barium	3010A/6010A	0.5	100	1.1	1.0	ND
Cadmium	3010A/6010A	0.01	1	0.02	ND	ND
Chromium	3010A/6010A	0.01	5	ND	ND	ND
Lead	3010A/6010A	0.05	5	ND	ND	ND
Mercury	7470	0.001	0.2	ND	ND	ND
Selenium	3010A/6010A	0.1	1	ND	ND	ND
Silver	3010A/6010A	0.01	5	ND	ND	ND

* From 40 CFR Part 261, et al., and *Federal Register*, March 29, 1990 and June 29, 1990.

Approved By: SMA Date: 11/4/96

TCLP/102194

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96
		Date Extracted:	11/1/96

Hydrocarbon Scan
EPA Methods 3550A/8015 Modified
Units: mg/Kg (ppm)
Dry Weight Basis

	Sample Name:	**SED1-675**	**SED2-500**	**SED3-100**
	Lab Code:	K9606885-001	K9606885-002	K9606885-003
	Date Analyzed:	11/1/96	11/1/96	11/1/96
Analyte	**MRL**			
Gasoline	10	ND	ND	ND
Mineral Spirits	10	ND	ND	ND
Jet Fuel	10	ND	ND	ND
Kerosene	10	ND	ND	ND
Diesel	10	ND	2340	ND
Other*	20	1010	1040	99

* Quantified using 30-weight motor oil as a standard.

Approved By: Linda Neuneker Date: 11-4-96

3S22/102094
06885PHC.SS1 - W015s 11/4/96

SCHN00245795

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Soil

Service Request: K9606885
Date Collected: 10/25/96
Date Received: 10/28/96
Date Extracted: 11/1/96

Hydrocarbon Scan
EPA Methods 3550A/8015 Modified
Units: mg/Kg (ppm)
Dry Weight Basis

	Sample Name:	SS1	SS2	SS3
	Lab Code:	K9606885-004	K9606885-005	K9606885-006
	Date Analyzed:	11/1/96	11/2/96	11/2/96
Analyte	**MRL**			
Gasoline	10	ND	ND	ND
Mineral Spirits	10	ND	ND	ND
Jet Fuel	10	ND	ND	ND
Kerosene	10	ND	ND	ND
Diesel	10	ND	ND	ND
Other*	20	7870	14000	2000

* Quantified using 30-weight motor oil as a standard.

Approved By: Sonda Neuneker Date: 11-4-96

3572/102094
06885PHC.SS1 - 8015 (2) 11/4/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96
		Date Extracted:	11/1/96

Hydrocarbon Scan
EPA Methods 3550A/8015 Modified
Units: mg/Kg (ppm)
Dry Weight Basis

	Sample Name:	SS4	SS5	Method Blank
	Lab Code:	K9606885-007	K9606885-008	K961101-MB
	Date Analyzed:	11/2/96	11/2/96	11/1/96
Analyte	**MRL**			
Gasoline	10	ND	ND	ND
Mineral Spirits	10	ND	ND	ND
Jet Fuel	10	ND	ND	ND
Kerosene	10	ND	ND	ND
Diesel	10	ND	ND	ND
Other*	20	32000	11000	ND

* Quantified using 30-weight motor oil as a standard.

Approved By: Linda Neuneker Date: 11-4-96

3S22/102094
06885PHC.SS1 - 8015s (3) 11/4/96

SCHN00245797

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Soil

Service Request: K9606885
Date Collected: 10/25/96
Date Received: 10/28/96
Date Extracted: 11/1/96
Date Analyzed: 11/1,2/96

Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3550A/8015 Modified

Sample Name	Lab Code	Percent Recovery o-Terphenyl
SED1-675	K9606885-001	82
SED2-500	K9606885-002	65
SED3-100	K9606885-003	72
SS1	K9606885-004	74
SS2	K9606885-005	NA
SS3	K9606885-006	NA
SS4	K9606885-007	NA
SS5	K9606885-008	NA
Method Blank	K961101-MB	70

CAS Acceptance Limits: 56-116

NA Not Applicable; see case narrative.

Approved By: Linda Neuneker Date: 11-4-96

SURJ/111594
06885PHC.SS1 - 8015aSUR 11/4/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Soil

Service Request: K9606885
Date Collected: 10/25/96
Date Received: 10/28/96
Date TCLP Performed: 11/1/96
Date Extracted: 11/4/96
Date Analyzed: 11/4/96

Matrix Spike Summary
Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

Sample Name: SED1-675
Lab Code: K9606885-001

Analyte	Spike Level	Sample Result	Spiked Sample Result	Percent Recovery*
Arsenic	5	ND	5.1	102
Barium	5	ND	5.4	108
Cadmium	1	ND	0.93	93
Chromium	5	ND	4.81	96
Lead	5	ND	4.70	94
Mercury	0.01	ND	0.009	90
Selenium	1	ND	1.0	100
Silver	1	ND	0.92	92

* Percent recovery information is provided in order to assess the performance of the method on this matrix.

Approved By: EMA Date: 11/4/96

Page No.:

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

Columbia Analytical Services Inc. 1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

DATE 10/25/96 PAGE 1 OF 1

PROJECT NAME SSP #
PROJECT MANAGER Tim Todd
COMPANY/ADDRESS Schnitzer Steel Products
PO Box 10047
Portland, OR 97210 PHONE 503/286-6944
SAMPLERS SIGNATURE Timothy R. Todd

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neut/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA418.1 ☐ OR418.1 ☐ WA418.1 ☐	TPH/Gas/BTEX Gas ☐ BTEX ☐ 5030/8015/8020	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☐	TPH/HCID ☐ OR/HCID ☐ WA/HCID ☐	TCLP Metals ☐	Metals (total or dissolved) List Below	Cyanide	pH, Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3 (circle)	NH_3-N, COD, Total P, TKN, TOC (circle)	Total Organic Halides (TOX) 9020 ☐ (AOX) 1650AO			REMARKS
SED1-675	10/25	0940	1885-1	Soil	1							X		X								
SED2-500		0955	2									X		X								
SED3-100		1015	3									X		X								
SS1		1305	4									X		X								
SS2		1315	5									X		X								
SS3		1320	6									X		X								
SS4		1325	7									X		X								
SS5		1330	8									X		X								

RELINQUISHED BY:	RECEIVED BY:
Signature: Timothy R. Todd	Signature: [illegible]
Printed Name: Timothy Todd	Printed Name: [illegible]
Firm: SSP	Firm: CAS
Date/Time: 10/28/96 1000	Date/Time: 10/29/96 730

TURNAROUND REQUIREMENTS
___ 24 hr ___ 48 hr. ___ 5 day
___ Standard (10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX preliminary Results
Requested Report Date ___

REPORT REQUIREMENTS
X I. Routine Report
___ II. Report (includes DUP,MS, MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O.# 28341
Bill To Same as above
Attn: Tim Todd

SAMPLE RECEIPT:
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No: 19606885

RELINQUISHED BY:	RECEIVED BY:
Signature	Signature
Printed Name	Printed Name
Firm	Firm
Date/Time	Date/Time

SPECIAL INSTRUCTIONS/COMMENTS:

DISTRIBUTION: WHITE - return to o... ...or; YELLOW - lab; PINK - retained by originator

400-05

SCHN00245800

Columbia Analytical Services inc.

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

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DATE 10/25/96 PAGE 1 OF 1

PROJECT NAME SSP #

PROJECT MANAGER Tim Todd

COMPANY/ADDRESS Schnitzer Steel Products
PO Box 10047
Portland, OR 97210 PHONE 503/286-6944

SAMPLERS SIGNATURE Timothy R. Todd

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA418.1 ☐ OR418.1 ☐ WA418.1 ☐	TPH/Gas/BTEX Gas ☐ BTEX ☐ 5030/8015/8020	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☐	TPH/HCID ☐ OR/HCID ☐ WA/HCID ☐	TCLP Metals ☒ VOA ☐	Semi Pest/ VOA ☐ Herb ☐	Metals (total or dissolved) List Below	Cyanide	pH, Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3 (circle)	NH_3-N, COD, Total-P, TKN, TOC (circle)	Total Organic Halides (TOX) 9020 ☐ (AOX) 1650A ☐			REMARKS
SED1-675	10/25	0940		Soil	1							X		X									
SED2-500		0955										X		X									
SED3-100		1015										X		X									
SS1		1305										X		X									
SS2		1315										X		X									
SS3		1320										X		X									
SS4		1325										X		X									
SS5		1330										X		X									

RELINQUISHED BY:
Signature: Timothy R. Todd
Printed Name: Timothy Todd
Firm: SSP
Date/Time: 10/28/96 1000

RECEIVED BY:
Signature
Printed Name
Firm
Date/Time

TURNAROUND REQUIREMENTS
___ 24 hr ___ 48 hr. ___ 5 day
___ Standard (10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX preliminary Results
Requested Report Date _____

REPORT REQUIREMENTS
X I. Routine Report
___ II. Report (includes DUP.MS. MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O.# 28341
Bill To Same as above, attn: Tim Todd

SAMPLE RECEIPT:
Shipping VIA:
Shipping #:
Condition:
Lab No:

RELINQUISHED BY:
Signature
Printed Name
Firm
Date/Time

RECEIVED BY:
Signature
Printed Name
Firm
Date/Time

SPECIAL INSTRUCTIONS/COMMENTS:

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

SCHN00245801

Columbia Analytical Services inc.

November 5, 1996

Service Request No: K9606885

Tim Todd
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97210

Re: SSP Project

Dear Tim:

Enclosed are the results of the sample(s) submitted to our laboratory on October 28, 1996. For your reference, these analyses have been assigned our service request number K9606885.

All analyses were performed consistent with our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 239.

Respectfully submitted,

Columbia Analytical Services, Inc.

Howard Boorse
Project Chemist

HB/amy

COLUMBIA ANALYTICAL SERVICES, Inc.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Steel Products Co.	**Service Request No.:**	K9606885
Project:	SSP	**Date Received:**	10/28/96
Sample Matrix:	Soil		

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of Columbia Analytical Services, Inc. (CAS). This report contains analytical results for sample(s) designated for Tier I data deliverables. When appropriate to the method, method blank results have been reported with each analytical test. Surrogate recoveries have been reported for all applicable organic analyses.

All EPA recommended holding times have been met for analyses in this sample delivery group.

The following difficulties were experienced during analysis of this batch:

The surrogate recovery for EPA Method 8015M in samples SS2, SS3, SS4 and SS5 were not calculated. The analysis of these samples required a dilution which resulted in a surrogate concentration below the Method Reporting Limit (MRL). No further corrective action was taken.

Approved by _____ Date 11-4-96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96

Total Solids

Prep Method:	NONE	Units:	PERCENT
Analysis Method:	160.3M	Basis:	NA
Test Notes:			

Sample Name	Lab Code	Date Analyzed	Result	Result Notes
SED1-675	K9606885-001	10/29/96	39.9	
SED2-500	K9606885-002	10/29/96	37.6	
SED3-100	K9606885-003	10/29/96	64.6	
SS1	K9606885-004	10/29/96	48.0	
SS2	K9606885-005	10/29/96	63.4	
SS3	K9606885-006	10/29/96	67.9	
SS4	K9606885-007	10/29/96	62.6	
SS5	K9606885-008	10/29/96	52.5	

Approved By: _____ Date: 10/30/96

Total Solids/060595

06885MA.AM1 - Sample 10/30/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Soil

Service Request: K9606885
Date Collected: 10/25/96
Date Received: 10/28/96
Date TCLP Performed: 11/1/96
Date Extracted: 11/4/96

Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

			Sample Name:	SED1-675	SED2-500	SED3-100
			Lab Code:	K9606885-001	K9606885-002	K9606885-003
			Date Analyzed:	11/4/96	11/4/96	11/4/96
Analyte	**EPA Method**	**MRL**	**Regulatory Limit***			
Arsenic	3010A/6010A	0.1	5	ND	ND	ND
Barium	3010A/6010A	0.5	100	ND	ND	ND
Cadmium	3010A/6010A	0.01	1	ND	ND	ND
Chromium	3010A/6010A	0.01	5	ND	ND	ND
Lead	3010A/6010A	0.05	5	ND	ND	ND
Mercury	7470	0.001	0.2	ND	ND	ND
Selenium	3010A/6010A	0.1	1	ND	ND	ND
Silver	3010A/6010A	0.01	5	ND	ND	ND

* From 40 CFR Part 261, et al., and *Federal Register*, March 29, 1990 and June 29, 1990.

Approved By: Emma Date: 11/4/96

TCLP/102194
06885ICP.EA1 - Sample 11/4/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Soil

Service Request: K9606885
Date Collected: 10/25/96
Date Received: 10/28/96
Date TCLP Performed: 11/1/96
Date Extracted: 11/4/96

Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

			Sample Name:	SS1	SS2	SS3
			Lab Code:	K9606885-004	K9606885-005	K9606885-006
			Date Analyzed:	11/4/96	11/4/96	11/4/96
Analyte	**EPA Method**	**MRL**	**Regulatory Limit***			
Arsenic	3010A/6010A	0.1	5	ND	ND	0.06
Barium	3010A/6010A	0.5	100	0.8	1.1	0.9
Cadmium	3010A/6010A	0.01	1	ND	ND	ND
Chromium	3010A/6010A	0.01	5	ND	ND	0.01
Lead	3010A/6010A	0.05	5	ND	ND	ND
Mercury	7470	0.001	0.2	ND	ND	ND
Selenium	3010A/6010A	0.1	1	ND	ND	ND
Silver	3010A/6010A	0.01	5	ND	ND	ND

* From 40 CFR Part 261, et al., and *Federal Register*, March 29, 1990 and June 29, 1990.

Approved By: Emm Date: 11/4/96

TCLP/102194
06885ICP.EA1 - Sample (2) 11/4/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Soil

Service Request: K9606885
Date Collected: 10/25/96
Date Received: 10/28/96
Date TCLP Performed: 11/1/96
Date Extracted: 11/4/96

Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

			Sample Name:	SS4	SS5	Method Blank
			Lab Code:	K9606885-007	K9606885-008	K9606885-MB
			Date Analyzed:	11/4/96	11/4/96	11/4/96
Analyte	**EPA Method**	**MRL**	**Regulatory Limit***			
Arsenic	3010A/6010A	0.1	5	ND	ND	ND
Barium	3010A/6010A	0.5	100	1.1	1.0	ND
Cadmium	3010A/6010A	0.01	1	0.02	ND	ND
Chromium	3010A/6010A	0.01	5	ND	ND	ND
Lead	3010A/6010A	0.05	5	ND	ND	ND
Mercury	7470	0.001	0.2	ND	ND	ND
Selenium	3010A/6010A	0.1	1	ND	ND	ND
Silver	3010A/6010A	0.01	5	ND	ND	ND

* From 40 CFR Part 261, et al., and *Federal Register*, March 29, 1990 and June 29, 1990.

Approved By: EMA Date: 11/4/96

TCLP/102194
06885ICP.EA1 - Sample (3) 11/4/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Soil

Service Request: K9606885
Date Collected: 10/25/96
Date Received: 10/28/96
Date Extracted: 11/1/96

Hydrocarbon Scan
EPA Methods 3550A/8015 Modified
Units: mg/Kg (ppm)
Dry Weight Basis

	Sample Name:	SED1-675	SED2-500	SED3-100
	Lab Code:	K9606885-001	K9606885-002	K9606885-003
	Date Analyzed:	11/1/96	11/1/96	11/1/96
Analyte	**MRL**			
Gasoline	10	ND	ND	ND
Mineral Spirits	10	ND	ND	ND
Jet Fuel	10	ND	ND	ND
Kerosene	10	ND	ND	ND
Diesel	10	ND	2340	ND
Other*	20	1010	1040	99

* Quantified using 30-weight motor oil as a standard.

Approved By: Linda Neuneker Date: 11-4-96

3S22/102094
06885PHC.SS1 - 8015s 11/4/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96
		Date Extracted:	11/1/96

Hydrocarbon Scan
EPA Methods 3550A/8015 Modified
Units: mg/Kg (ppm)
Dry Weight Basis

	Sample Name:	SS1	SS2	SS3
	Lab Code:	K9606885-004	K9606885-005	K9606885-006
	Date Analyzed:	11/1/96	11/2/96	11/2/96
Analyte	**MRL**			
Gasoline	10	ND	ND	ND
Mineral Spirits	10	ND	ND	ND
Jet Fuel	10	ND	ND	ND
Kerosene	10	ND	ND	ND
Diesel	10	ND	ND	ND
Other*	20	7870	14000	2000

* Quantified using 30-weight motor oil as a standard.

Approved By: Linda Neuneker Date: 11-4-96

3S22/102094
06885FHC.SS1 - 8015s (2) 11/4/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96
		Date Extracted:	11/1/96

Hydrocarbon Scan
EPA Methods 3550A/8015 Modified
Units: mg/Kg (ppm)
Dry Weight Basis

	Sample Name:	SS4	SS5	Method Blank
	Lab Code:	K9606885-007	K9606885-008	K961101-MB
	Date Analyzed:	11/2/96	11/2/96	11/1/96
Analyte	**MRL**			
Gasoline	10	ND	ND	ND
Mineral Spirits	10	ND	ND	ND
Jet Fuel	10	ND	ND	ND
Kerosene	10	ND	ND	ND
Diesel	10	ND	ND	ND
Other*	20	32000	11000	ND

* Quantified using 30-weight motor oil as a standard.

Approved By: Linda Neuneker Date: 11-4-96

3S22/102094
06885PHC.SS1 - 8015s (3) 11/4/96

SCHN00245811

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96
		Date TCLP Performed:	11/1/96
		Date Extracted:	11/4/96
		Date Analyzed:	11/4/96

Matrix Spike Summary
Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

Sample Name: SED1-675
Lab Code: K9606885-001

Analyte	Spike Level	Sample Result	Spiked Sample Result	Percent Recovery*
Arsenic	5	ND	5.1	102
Barium	5	ND	5.4	108
Cadmium	1	ND	0.93	93
Chromium	5	ND	4.81	96
Lead	5	ND	4.70	94
Mercury	0.01	ND	0.009	90
Selenium	1	ND	1.0	100
Silver	1	ND	0.92	92

* Percent recovery information is provided in order to assess the performance of the method on this matrix.

Approved By: EMA Date: 11/4/96

TCLPMS102494 - Spike 11/4/96

SCHN00245812

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96
		Date Extracted:	11/1/96
		Date Analyzed:	11/1,2/96

Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3550A/8015 Modified

Sample Name	Lab Code	Percent Recovery o-Terphenyl
SED1-675	K9606885-001	82
SED2-500	K9606885-002	65
SED3-100	K9606885-003	72
SS1	K9606885-004	74
SS2	K9606885-005	NA
SS3	K9606885-006	NA
SS4	K9606885-007	NA
SS5	K9606885-008	NA
Method Blank	K961101-MB	70

CAS Acceptance Limits: 56-116

NA Not Applicable; see case narrative.

Approved By: Sandra Neuneker Date: 11-4-96

SUR.I/111594
06885PHC.SS1 - 8015eSUR 11/4/96

Columbia Analytical Services Inc.

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

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DATE 10/25/96 PAGE 1 OF 1

PROJECT NAME SSP #

PROJECT MANAGER Tim Todd

COMPANY/ADDRESS Schnitzer Steel Products
PO Box 10047
Portland, OR 97210 PHONE 503/286-6944

SAMPLERS SIGNATURE Timothy R. Todd

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA418.1 ☐ OR418.1 ☐ WA418.1 ☐	TPH/Gas/BTEX 5030/8015/8020 Gas ☐ BTEX ☐	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☐	TPH/HCID ☐ OR/HCID ☐ WA/HCID ☐	TCLP Metals ☐	Semi Pest/ VOA ☐ Herb ☐	Metals (total or dissolved) List Below	Cyanide	pH, Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3 (circle)	NH3-N, COD, Total-P, TKN, TOC (circle)	Total Organic Halides (TOX) 9020 ☐ (AOX) 1650A ☐			REMARKS
SED1-675	10/25	0940	6885-1	Soil	1								X		X								
SED2-500		0955	2										X		X								
SED3-100		1015	3										X		X								
SS1		1305	4										X		X								
SS2		1315	5										X		X								
SS3		1320	6										X		X								
SS4		1325	7										X		X								
SS5		1330	8										X		X								

RELINQUISHED BY:	RECEIVED BY:
Signature: Timothy R. Todd	Signature: [illegible]
Printed Name: Timothy Todd	Printed Name: [illegible]
Firm: SSP	Firm: [illegible]
Date/Time: 10/28/96 1000	Date/Time: 10/29/96 730

TURNAROUND REQUIREMENTS
___ 24 hr ___ 48 hr. ___ 5 day
___ Standard (10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX preliminary Results
Requested Report Date _____

REPORT REQUIREMENTS
X I. Routine Report
___ II. Report (includes DUP.MS. MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O.# 28341
Bill To Same as above
Attn: Tim Todd

SAMPLE RECEIPT:
Shipping VIA: _____
Shipping #: _____
Condition: _____
Lab No: 96106885

RELINQUISHED BY:	RECEIVED BY:
Signature	Signature
Printed Name	Printed Name
Firm	Firm
Date/Time	Date/Time

SPECIAL INSTRUCTIONS/COMMENTS:

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

SCHN00245814

SCHNITZER STEEL PRODUCTS CO.

32[illegible] W. Yeon Ave. P.O. Box 10047 Portland, Oregon 97210 Phone 503/224-9900 Telex/W.U. 36-0144

June 28, 1996

Mr. Neil Mullane
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201-4987

Re: Sampling Results for 1995 - 1996, Permit #1200R, File #108103

Dear Mr. Mullane:

Monitoring results for the referenced permit are attached, along with copies of laboratory analytical reports. We have taken a number of measures to reduce the concentrations of oil and grease in discharging stormwater, which appear to have been successful. These measures include increased frequency of cleaning out stormwater catchbasins, and emphasis of best management practices developed in our stormwater pollution control plan.

We have also improved housekeeping practices the vicinity of areas that drain to outfalls 7 and 11. We will monitor these outfalls more closely, and attempt to revise best management practices to reduce hydrogen ion concentrations in these outfalls.

Please contact me at (503) 286-6944 if you have questions.

Sincerely,
Schnitzer Steel Industries, Inc.

Timothy R. Todd

Timothy R. Todd
Environmental Administrator

Table 1
Stormwater Sampling Results
Schnitzer Steel Industries, Inc.
Portland, Oregon
(mg/L)

Sample Data		Laboratory Results					
Outfall	Date	pH[a]	COD	TOC	Conduct[b]	TSS	TPH
2	11/27/95	7.6	280	97	540	420	11.0
	4/12/96	7.9	500	200	940	720	5.3
3	11/27/95	7.5	13	1.7	32	27	<3.0
	4/12/96	8.4	70	29	70	250	3.5
4	11/27/95	7.0	24	5.6	37	64	<3.0
	4/12/96	8.1	220	71	51	1200	1.9
5	11/27/95	8.5	120	22	120	280	6.0
	4/12/96	8.6	91	34	220	250	4.1
6	11/27/95	7.3	12	3.7	48	24	<3.0
	4/12/96	8.5	120	46	66	540	1.9
7	11/27/95	9.1	42	16	52	250	4.0
	4/12/96	9.2	74	33	69	130	3.5
11	11/27/95	9.1	27	12	48	200	3.0
	4/12/96	9.2	420	90	81	1200	5.4
12	11/27/95	7.3	400	130	510	1900	6.0
	4/12/96	7.8	140	56	440	61	3.3
14	11/27/95	8.8	150	47	290	460	14
	4/12/96	7.7	32	12	130	56	3.1
15	11/27/95	7.9	47	32	130	56	27
	4/12/96	8.5	64	24	220	110	8.6
16	11/27/95	7.4	40	18	430	17	<3.0
	4/12/96	8.1	48	19	180	89	4.3
17	11/27/95	8.9	25	9.9	31	130	<3.0
	4/12/96	8.9	35	14	60	95	2.0
18	11/27/95	7.6	90	35	550	41	4.0
	4/12/96	8.1	100	36	540	71	3.2

Note:
Outfalls 1, 8, 10, 13, and 18 were submerged and not accessible for sampling.
[a] Results in SU.
[b] Results in umhs/cm

Table 1
Stormwater Sampling Results
Schnitzer Steel Industries, Inc.
Portland, Oregon
(mg/L)

Sample Data		Laboratory Results - Metals							
O/F	Date	As	Cd	Cr	Cu	Pb	Hg	Ni	Zn
2	11/27/95	<0.01	0.007	0.18	0.42	0.78	0.0014	<0.1	5.3
	4/12/96	0.013	0.024	0.14	0.60	1.2	0.0029	0.13	8.7
3	11/27/95	<0.01	<0.002	0.01	0.06	0.05	<0.0002	<0.1	0.24
	4/12/96	0.002	<0.005	0.026	0.14	0.26	<0.0002	0.027	1.9
4	11/27/95	<0.01	<0.002	0.02	0.02	.05	<0.0002	<0.1	0.18
	4/12/96	0.006	<0.005	0.054	0.19	0.32	0.0007	0.044	1.8
5	11/27/95	<0.01	<0.002	0.05	0.12	0.22	0.0006	<0.1	0.54
	4/12/96	0.005	<0.005	0.039	0.15	0.35	0.001	0.033	0.74
6	11/27/95	<0.01	<0.002	<0.01	<0.01	0.02	<0.0002	<0.1	0.05
	4/12/96	0.005	<0.005	0.023	0.08	0.11	0.0003	0.033	0.29
7	11/27/95	<0.01	<0.002	0.03	0.02	0.05	<0.0002	<0.1	0.15
	4/12/96	0.006	<0.005	0.029	0.073	0.14	0.0003	0.030	0.30
11	11/27/95	<0.01	<0.002	0.03	0.07	0.09	0.004	<0.1	0.20
	4/12/96	0.021	<0.005	0.14	0.27	0.54	0.001	0.098	1.0
12	11/27/95	0.07	0.029	1.0	3.1	3.3	0.012	0.35	10
	4/12/96	0.011	0.006	0.10	0.46	1.2	0.003	0.074	2.2
14	11/27/95	0.02	0.010	0.45	0.64	1.2	0.0046	<0.1	4.1
	4/12/96	<0.02	<0.005	0.017	0.067	0.11	<0.0002	<0.02	0.3
15	11/27/95	<0.01	0.003	0.03	0.15	0.33	0.0004	<0.1	0.26
	4/12/96	0.006	<0.005	0.019	0.14	0.34	0.001	0.037	0.43
16	11/27/95	<0.01	<0.002	0.01	0.03	0.05	<0.0002	<0.1	0.15
	4/12/96	0.002	<0.005	<0.01	0.098	0.24	0.0004	0.04	0.28
17	11/27/95	<0.01	<0.002	0.06	0.09	0.09	<0.0002	<0.1	0.26
	4/12/96	0.003	<0.005	0.034	0.085	0.16	0.0003	<0.02	0.27
18	11/27/95	<0.01	<0.002	0.03	0.07	0.11	0.0008	<0.1	0.30
	4/12/96	0.007	<0.005	0.042	0.17	0.23	0.0007	0.026	0.44

Note:
Outfalls 1, 8, 10, and 13 were submerged and not accessible for sampling.

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

May 7, 1996

Schnitzer Steel Industries, Inc.
P.O. Box 10047
Portland, OR 97210

Attention: Tim Todd

RE: JOB #
P.O.# 26718
PROJECT -

Enclosed are test results for your samples received in this lab on Apr. 12, 1996. For your reference, these analyses have been assigned our NCA # P604214.

Solid samples are reported on a dry weight basis except for Oregon DEQ Fuels Methods and where otherwise noted.

This report will be accompanied by a separate Quality Control Data Report, unless omitted by client request.

Please call if you have any questions.

Respectfully,

Philip Nerenberg
Laboratory Manager

NORTH CREEK ANALYTICAL
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pH per EPA 9040
Results in standard units

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Matrix: water
Sampled: 04/12/96
Received: 04/12/96

Client ID	Lab ID	Analyte	Results	MRL	Date Prepared	Date Analyzed
2	P604214-1	pH	7.9	0-14	04/13/96	04/13/96
3	P604214-2	pH	8.4	0-14	04/13/96	04/13/96
4	P604214-3	pH	8.1	0-14	04/13/96	04/13/96
5	P604214-4	pH	8.6	0-14	04/13/96	04/13/96
6	P604214-5	pH	8.5	0-14	04/13/96	04/13/96
7	P604214-6	pH	9.2	0-14	04/13/96	04/13/96
11	P604214-7	pH	9.2	0-14	04/13/96	04/13/96
12	P604214-8	pH	7.8	0-14	04/13/96	04/13/96
14	P604214-9	pH	7.7	0-14	04/13/96	04/13/96
15	P604214-10	pH	8.5	0-14	04/13/96	04/13/96
16	P604214-11	pH	8.1	0-14	04/13/96	04/13/96
17	P604214-12	pH	8.9	0-14	04/13/96	04/13/96
18	P604214-13	pH	8.1	0-14	04/13/96	04/13/96

MRL Method Reporting Level
ND None Detected at or above the method reporting level
* See Comment Section at end of report

SCHN00245819

NORTH CREEK ANALYTICAL
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Total Suspended Solids per EPA 160.2

Results In mg/L (ppm)

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Matrix: water
Sampled: 04/12/96
Received: 04/12/96

Client ID	Lab ID	Analyte	Results	MRL	Date Prepared	Date Analyzed
2	P604214-1	TSS	720	10	04/17/96	04/21/96
3	P604214-2	TSS	250	10	04/17/96	04/21/96
4	P604214-3	TSS	1200	10	04/17/96	04/21/96
5	P604214-4	TSS	250	10	04/17/96	04/21/96
6	P604214-5	TSS	540	10	04/17/96	04/21/96
7	P604214-6	TSS	130	10	04/17/96	04/21/96
11	P604214-7	TSS	1200	10	04/17/96	04/21/96
12	P604214-8	TSS	61	10	04/17/96	04/21/96
14	P604214-9	TSS	56	10	04/17/96	04/21/96
15	P604214-10	TSS	110	10	04/17/96	04/21/96
16	P604214-11	TSS	89	10	04/17/96	04/21/96
17	P604214-12	TSS	95	10	04/17/96	04/21/96
18	P604214-13	TSS	71	10	04/17/96	04/21/96

MRL Method Reporting Level
ND None Detected at or above the method reporting level
* See Comment Section at end of report

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Conductivity per EPA 120.1
Results In micromhos/cm2

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Matrix: water
Sampled: 04/12/96
Received: 04/12/96

Client ID	Lab ID	Analyte	Results	MRL	Date Prepared	Date Analyzed
2	P604214-1	Conductivity	940	15	04/13/96	04/13/96
3	P604214-2	Conductivity	70	15	04/13/96	04/13/96
4	P604214-3	Conductivity	51	15	04/13/96	04/13/96
5	P604214-4	Conductivity	220	15	04/13/96	04/13/96
6	P604214-5	Conductivity	66	15	04/13/96	04/13/96
7	P604214-6	Conductivity	69	15	04/13/96	04/13/96
11	P604214-7	Conductivity	81	15	04/13/96	04/13/96
12	P604214-8	Conductivity	440	15	04/13/96	04/13/96
14	P604214-9	Conductivity	130	15	04/13/96	04/13/96
15	P604214-10	Conductivity	220	15	04/13/96	04/13/96
16	P604214-11	Conductivity	180	15	04/13/96	04/13/96
17	P604214-12	Conductivity	60	15	04/13/96	04/13/96
18	P604214-13	Conductivity	540	15	04/13/96	04/13/96

MRL Method Reporting Level
ND None Detected at or above the method reporting level
* See Comment Section at end of report

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Chemical Oxygen Demand per EPA 410.4

Results In mg/L (ppm)

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Matrix: water
Sampled: 04/12/96
Received: 04/12/96

Client ID	Lab ID	Analyte	Results	MRL	Date Prepared	Date Analyzed
2	P604214-1	COD	500	5.0	04/29/96	04/30/96
3	P604214-2	COD	70	5.0	04/23/96	04/23/96
4	P604214-3	COD	220	5.0	04/29/96	04/30/96
5	P604214-4	COD	91	5.0	04/23/96	04/23/96
6	P604214-5	COD	120	5.0	04/23/96	04/23/96
7	P604214-6	COD	74	5.0	04/23/96	04/23/96
11	P604214-7	COD	420	5.0	04/29/96	04/30/96
12	P604214-8	COD	140	5.0	04/23/96	04/23/96
14	P604214-9	COD	32	5.0	04/23/96	04/23/96
15	P604214-10	COD	64	5.0	04/23/96	04/23/96
16	P604214-11	COD	48	5.0	04/23/96	04/23/96
17	P604214-12	COD	35	5.0	04/23/96	04/23/96
18	P604214-13	COD	100	5.0	04/23/96	04/23/96

MRL Method Reporting Level
ND None Detected at or above the method reporting level
* See Comment Section at end of report

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Total Metals per EPA 200 series

Results in mg/L (ppm)

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Matrix: water
Sampled: 04/12/96
Received: 04/12/96

Client ID	Lab ID	Analyte	Result	MRL	Date Prepared	Date Analyzed
2	P604214-1	Arsenic	0.013	0.0020	04/17/96	05/03/96
		Cadmium	0.024	0.0050		
		Chromium	0.14	0.0050		
		Copper	0.60	0.0050		
		Lead	1.2	0.0020		
		Mercury	0.0029	0.00020		
		Nickel	0.13	0.015		
		Zinc	8.7	0.010		
3	P604214-2	Arsenic	0.0026	0.0020	04/17/96	05/03/96
		Cadmium	ND	0.0050		
		Chromium	0.026	0.0050		
		Copper	0.14	0.0050		
		Lead	0.26	0.0020		
		Mercury	ND	0.00020		
		Nickel	0.027	0.015		
		Zinc	1.9	0.010		
4	P604214-3	Arsenic	0.0056	0.0020	04/17/96	05/03/96
		Cadmium	ND	0.0050		
		Chromium	0.054	0.0050		
		Copper	0.19	0.0050		
		Lead	0.32	0.0020		
		Mercury	0.00067	0.00020		
		Nickel	0.044	0.015		
		Zinc	1.8	0.010		
5	P604214-4	Arsenic	0.0045	0.0020	04/17/96	05/03/96
		Cadmium	ND	0.0050		
		Chromium	0.039	0.0050		
		Copper	0.15	0.0050		
		Lead	0.35	0.0020		
		Mercury	0.0010	0.00020		
		Nickel	0.033	0.015		
		Zinc	0.74	0.010		

MRL Method Reporting Level
ND None Detected at or above the method reporting level
* See Comment Section at end of report

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Total Metals per EPA 200 series
Results in mg/L (ppm)

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Matrix: water
Sampled: 04/12/96
Received: 04/12/96

Client ID	Lab ID	Analyte	Result	MRL	Date Prepared	Date Analyzed
6	P604214-5	Arsenic	0.0053	0.0020	04/17/96	05/03/96
		Cadmium	ND	0.0050		
		Chromium	0.023	0.0050		
		Copper	0.080	0.0050		
		Lead	0.11	0.0020		
		Mercury	0.00027	0.00020		
		Nickel	0.033	0.015		
		Zinc	0.29	0.010		
7	P604214-6	Arsenic	0.0055	0.0020	04/17/96	05/03/96
		Cadmium	ND	0.0050		
		Chromium	0.029	0.0050		
		Copper	0.073	0.0050		
		Lead	0.14	0.0020		
		Mercury	0.00032	0.00020		
		Nickel	0.030	0.015		
		Zinc	0.30	0.010		
11	P604214-7	Arsenic	0.021	0.0020	04/17/96	05/03/96
		Cadmium	ND	0.0050		
		Chromium	0.14	0.0050		
		Copper	0.27	0.0050		
		Lead	0.54	0.0020		
		Mercury	0.0011	0.00020		
		Nickel	0.098	0.015		
		Zinc	1.0	0.010		
12	P604214-8	Arsenic	0.011	0.0020	04/17/96	05/03/96
		Cadmium	0.0062	0.0050		
		Chromium	0.10	0.0050		
		Copper	0.46	0.0050		
		Lead	1.2	0.0020		
		Mercury	0.0033	0.00020		
		Nickel	0.074	0.015		
		Zinc	2.2	0.010		

MRL Method Reporting Level
ND None Detected at or above the method reporting level
* See Comment Section at end of report

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

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SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

Total Metals per EPA 200 series

Results in mg/L (ppm)

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Matrix: water
Sampled: 04/12/96
Received: 04/12/96

Client ID	Lab ID	Analyte	Result	MRL	Date Prepared	Date Analyzed
14	P604214-9	Arsenic	ND	0.0020	04/17/96	05/03/96
		Cadmium	ND	0.0050		
		Chromium	0.017	0.0050		
		Copper	0.067	0.0050		
		Lead	0.11	0.0020		
		Mercury	ND	0.00020		
		Nickel	ND	0.015		
		Zinc	0.30	0.010		
15	P604214-10	Arsenic	0.0058	0.0020	04/17/96	05/03/96
		Cadmium	ND	0.0050		
		Chromium	0.019	0.0050		
		Copper	0.14	0.0050		
		Lead	0.34	0.0020		
		Mercury	0.0011	0.00020		
		Nickel	0.037	0.015		
		Zinc	0.43	0.010		
16	P604214-11	Arsenic	0.0020	0.0020	04/17/96	05/03/96
		Cadmium	ND	0.0050		
		Chromium	ND	0.010		
		Copper	0.098	0.0050		
		Lead	0.24	0.0020		
		Mercury	0.00041	0.00020		
		Nickel	0.040	0.015		
		Zinc	0.28	0.010		
17	P604214-12	Arsenic	0.0034	0.0020	04/17/96	05/03/96
		Cadmium	ND	0.0050		
		Chromium	0.034	0.0050		
		Copper	0.085	0.0050		
		Lead	0.16	0.0020		
		Mercury	0.00027	0.00020		
		Nickel	ND	0.015		
		Zinc	0.27	0.010		

MRL Method Reporting Level
ND None Detected at or above the method reporting level
* See Comment Section at end of report

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

Total Metals per EPA 200 series

Results In mg/L (ppm)

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Matrix: water
Sampled: 04/12/96
Received: 04/12/96

Client ID	Lab ID	Analyte	Result	MRL	Date Prepared	Date Analyzed
18	P604214-13	Arsenic	0.0068	0.0020	04/17/96	05/03/96
		Cadmium	ND	0.0050		
		Chromium	0.042	0.0050		
		Copper	0.17	0.0050		
		Lead	0.23	0.0020		
		Mercury	0.00066	0.00020		
		Nickel	0.026	0.015		
		Zinc	0.44	0.010		

MRL Method Reporting Level
ND None Detected at or above the method reporting level
* See Comment Section at end of report

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

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PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

Total Organic Carbon per EPA 415.1

Results In mg/L (ppm)

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Matrix: water
Sampled: 04/12/96
Received: 04/12/96

Client ID	Lab ID	Analyte	Results	MRL	Date Prepared	Date Analyzed
2	P604214-1	TOC	200	3.0	04/18/96	04/18/96
3	P604214-2	TOC	29	3.0	04/18/96	04/18/96
4	P604214-3	TOC	71	3.0	04/18/96	04/18/96
5	P604214-4	TOC	34	3.0	04/18/96	04/18/96
6	P604214-5	TOC	46	3.0	04/18/96	04/18/96
7	P604214-6	TOC	33	3.0	04/18/96	04/18/96
11	P604214-7	TOC	90	3.0	04/18/96	04/18/96
12	P604214-8	TOC	56	3.0	04/18/96	04/18/96
14	P604214-9	TOC	12	3.0	04/18/96	04/18/96
15	P604214-10	TOC	24	3.0	04/18/96	04/18/96
16	P604214-11	TOC	19	3.0	04/19/96	04/19/96
17	P604214-12	TOC	14	3.0	04/19/96	04/19/96
18	P604214-13	TOC	36	3.0	04/19/96	04/19/96

MRL Method Reporting Level
ND None Detected at or above the method reporting level
* See Comment Section at end of report

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

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PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

Oil & Grease per EPA 413.2

Results In mg/L (ppm)

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Matrix: water
Sampled: 04/12/96
Received: 04/12/96

Client ID	Lab ID	Analyte	Results	MRL	Date Prepared	Date Analyzed
2	P604214-1	Oil & Grease	5.3	0.50	04/18/96	04/19/96
3	P604214-2	Oil & Grease	3.5	0.50	04/18/96	04/19/96
4	P604214-3	Oil & Grease	1.9	0.50	04/18/96	04/19/96
5	P604214-4	Oil & Grease	4.1	0.50	04/18/96	04/19/96
6	P604214-5	Oil & Grease	1.9	0.50	04/18/96	04/19/96
7	P604214-6	Oil & Grease	3.5	0.50	04/18/96	04/19/96
11	P604214-7	Oil & Grease	5.4	0.50	04/18/96	04/19/96
12	P604214-8	Oil & Grease	3.3	0.50	04/18/96	04/19/96
14	P604214-9	Oil & Grease	3.1	0.50	04/18/96	04/19/96
15	P604214-10	Oil & Grease	8.6	0.50	04/18/96	04/19/96
16	P604214-11	Oil & Grease	4.3	0.50	04/18/96	04/19/96
17	P604214-12	Oil & Grease	2.0	0.50	04/18/96	04/19/96
18	P604214-13	Oil & Grease	3.2	0.50	04/18/96	04/19/96

MRL Method Reporting Level
ND None Detected at or above the method reporting level
* See Comment Section at end of report

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

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May 7, 1996

Schnitzer Steel Industries, Inc.
P.O. Box 10047
Portland, OR 97210

Attention: Tim Todd

Re: Quality Control Data
JOB #
P.O.# 26718
PROJECT -

NCA project number P604214.

Note: Surrogate Recoveries are included in the final report.

QUALITY CONTROL DEFINITIONS

METHOD BLANK RESULTS

The method blank is an analyte-free matrix which is carried through the same analytical process as the samples. It is used to document contamination that may result from the analytical process.

SURROGATE STANDARD

A surrogate standard (i.e., a chemical compound not expected to occur in an environmental sample) is added to each sample, blank, and matrix spike sample just prior to extraction or processing. The recovery of the surrogate standard is used to monitor for unusual matrix effects, gross sample processing errors, etc. Surrogate recovery is evaluated for acceptance by determining whether the measured concentration falls within accepted limits.

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Accuracy is measured by percent recovery as in:

$$\% \text{ Recovery} = \frac{\text{(Measured Concentration)}}{\text{(Actual Concentration)}} \times 100$$

Precision is measured using duplicate tests by relative percent difference.

$$\text{RPD} = \frac{\text{(Result of Test 1 - Result of Test 2)}}{\text{(Result of Test 1 + Result of Test 2)/2}} \times 100$$

If you should have any questions concerning this report, please contact me.

Sincerely,

Philip Nerenberg
Laboratory Manager

SCHN00245830

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

BATCH QUALITY CONTROL RESULTS
pH per EPA 9040

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Received: 04/12/96

DUPLICATE
Batch # IK96050a
Results In standard units

Compound	Sample Result	Dup Result
pH	7.16	7.20

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

BATCH QUALITY CONTROL RESULTS
Total Suspended Solids per EPA 160.2

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Received: 04/12/96

METHOD BLANK
Batch # IM96026a
Results In mg/L (ppm)

Compound	Result	MRL
TSS	ND	10
Date Prepared	04/17/96	
Date Analyzed	04/21/96	

METHOD BLANK
Batch # IM96027a
Results In mg/L (ppm)

Compound	Result	MRL
TSS	ND	10
Date Prepared	04/17/96	
Date Analyzed	04/21/96	

DUPLICATE
Batch # IM96026a **Duplicate ID P604189-13**
Results In mg/L (ppm)

Compound	Sample Conc	Dup Conc	RPD	QC Limit RPD
TSS	168	164	2.4	25

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

BATCH QUALITY CONTROL RESULTS
Total Suspended Solids per EPA 160.2

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Received: 04/12/96

DUPLICATE
Batch # IM96027a
Results In mg/L (ppm)

Duplicate ID P604214-6

Compound	Sample Conc	Dup Conc	RPD	QC Limit RPD
TSS	129	115	12	25

LABORATORY CONTROL SAMPLE
Batch # IM96026a
Results In mg/L (ppm)

Compound	True	Found	% Rec	QC Limit % Rec
TSS	60	56	93	76-124

LABORATORY CONTROL SAMPLE
Batch # IM96027a
Results In mg/L (ppm)

Compound	True	Found	% Rec	QC Limit % Rec
TSS	60	62	103	76-124

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

BATCH QUALITY CONTROL RESULTS
Conductivity per EPA 120.1

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Received: 04/12/96

METHOD BLANK
Batch # ID96010a
Results In micromhos/cm2

Compound	Result	MRL
Conductivity	ND	15
Date Prepared	04/13/96	
Date Analyzed	04/13/96	

DUPLICATE
Batch # ID96010a **Duplicate ID P604214-1**
Results In micromhos/cm2

Compound	Sample Conc	Dup Conc	RPD	QC Limit RPD
Conductivity	942	947	0.53	25

LABORATORY CONTROL SAMPLE
Batch # ID96010a
Results In micromhos/cm2

Compound	True	Found	% Rec	QC Limit % Rec
Conductivity	10.8	11.0	102	98-102

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

BATCH QUALITY CONTROL RESULTS
Chemical Oxygen Demand per EPA 410.4

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Received: 04/12/96

METHOD BLANK
Batch # IC96023a
Results In mg/L (ppm)

Compound	Result	MRL
COD	ND	5.0
Date Prepared	04/23/96	
Date Analyzed	04/23/96	

METHOD BLANK
Batch # IC96025a
Results In mg/L (ppm)

Compound	Result	MRL
COD	ND	5.0
Date Prepared	04/29/96	
Date Analyzed	04/30/96	

DUPLICATE
Batch # IC96023a
Results In mg/L (ppm)

Duplicate ID P604273-1

Compound	Sample Conc	Dup Conc	RPD	QC Limit RPD
COD (ap)	18.2	17.6	-	20

(ap) RPD is not reported for sample concentrations less than 5 times the MRL.

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

BATCH QUALITY CONTROL RESULTS
Chemical Oxygen Demand per EPA 410.4

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Received: 04/12/96

DUPLICATE
Batch # IC96025a
Results In mg/L (ppm)

Duplicate ID P604333-1

Compound	Sample Conc	Dup Conc	RPD	QC Limit RPD
COD (ap)	21.2	22.1	-	20

(ap) RPD is not reported for sample concentrations less than 5 times the MRL.

LABORATORY CONTROL SAMPLE
Batch # IC96023a
Results In mg/L (ppm)

Compound	True	Found	% Rec	QC Limit % Rec
COD	30.0	27.9	93	77-124

LABORATORY CONTROL SAMPLE
Batch # IC96025a
Results In mg/L (ppm)

Compound	True	Found	% Rec	QC Limit % Rec
COD	30	28.2	94	77-124

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

BATCH QUALITY CONTROL RESULTS
Total Metals per EPA 200 Series

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Received: 04/12/96

METHOD BLANK
Batch # QW96132a
Results In mg/L (ppm)

Compound	Result	MRL
Arsenic	ND	0.0020
Cadmium	ND	0.0050
Chromium	ND	0.0050
Copper	ND	0.0050
Lead	ND	0.0020
Nickel	ND	0.015
Zinc	ND	0.010
Date Prepared	04/17/96	
Date Analyzed	05/02/96	

DUPLICATE
Batch # QW96132a **Duplicate ID P604204-5**
Results In mg/L (ppm)

Compound	Sample Conc	Dup Conc	RPD	QC Limit RPD
Arsenic (ap)	0.0098	0.0096	-	20
Cadmium (ap)	ND	ND	-	20
Chromium (ap)	ND	ND	-	20
Copper (ap)	0.0073	0.0073	-	20
Lead (ap)	0.0020	0.0020	-	20
Nickel (ap)	ND	ND	-	20
Zinc (ap)	0.0160	0.0146	-	20

(ap) RPD is not reported for sample concentrations less than 5 times the MRL.

SCHN00245837

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

BATCH QUALITY CONTROL RESULTS
Total Metals per EPA 200 Series

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Received: 04/12/96

MATRIX SPIKE
Batch # QW96132a
Results In mg/L (ppm)

Spike ID P604204-5

Compound	Spike Added	Sample Conc	MS Conc	MS % Rec	QC Limit % Rec
Arsenic	0.10	0.0098	0.106	96	70-130
Cadmium	0.10	ND	0.0940	94	70-130
Chromium	0.10	ND	116	116	70-130
Copper	0.10	0.0073	0.109	102	70-130
Lead	0.10	0.0020	0.0942	92	70-130
Nickel	0.10	ND	0.106	106	70-130
Zinc	0.10	0.0160	0.112	96	70-130

LABORATORY CONTROL SAMPLE
Batch # QW96132a
Results In mg/L (ppm)

Compound	True	Found	% Rec	QC Limit % Rec
Arsenic	0.10	0.0864	86	80-105
Cadmium	0.10	0.0896	90	85-115
Chromium	0.10	0.109	109	85-115
Copper	0.10	0.0985	99	85-115
Lead	0.10	0.101	101	85-115
Nickel	0.10	0.0996	100	85-115
Zinc	0.10	0.0856	86	80-110

SCHN00245838

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

BATCH QUALITY CONTROL RESULTS
Total Metals per EPA 200 Series

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Received: 04/12/96

METHOD BLANK
Batch # ZW96052a
Results In mg/L (ppm)

Compound	Result	MRL
Mercury	ND	0.00020
Date Prepared	04/17/96	
Date Analyzed	04/18/96	

DUPLICATE
Batch # ZW96052a **Duplicate ID P604184-1**
Results In mg/L (ppm)

Compound	Sample Conc	Dup Conc	RPD	QC Limit RPD
Mercury (ap)	ND	ND	-	20

(ap) RPD is not reported for sample concentrations less than 5 times the MRL.

MATRIX SPIKE
Batch # ZW96052a **Spike ID P604184-1**
Results In mg/L (ppm)

Compound	Spike Added	Sample Conc	MS Conc	MS % Rec	QC Limit % Rec
Mercury	0.0050	ND	0.0053	106	75-125

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

BATCH QUALITY CONTROL RESULTS
Total Metals per EPA 200 Series

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Received: 04/12/96

LABORATORY CONTROL SAMPLE
Batch # ZW96052a
Results In mg/L (ppm)

Compound	True	Found	% Rec	QC Limit % Rec
Mercury	0.0050	0.0051	102	82-110

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

BATCH QUALITY CONTROL RESULTS
Total Organic Carbon per EPA 415.1

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Received: 04/12/96

METHOD BLANK
Batch # IW96022a
Results In mg/L (ppm)

Compound	Result	MRL
TOC	ND	3.0
Date Prepared	04/18/96	
Date Analyzed	04/18/96	

METHOD BLANK
Batch # IW96023a
Results In mg/L (ppm)

Compound	Result	MRL
TOC	ND	3.0
Date Prepared	04/19/96	
Date Analyzed	04/19/96	

DUPLICATE
Batch # IW96022a
Results In mg/L (ppm)

Duplicate ID P604214-2

Compound	Sample Conc	Dup Conc	RPD	QC Limit RPD
TOC	28.6	28.9	1.0	20

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

BATCH QUALITY CONTROL RESULTS
Total Organic Carbon per EPA 415.1

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Received: 04/12/96

DUPLICATE
Batch # IW96023a
Results In mg/L (ppm)

Duplicate ID P604214-11

Compound	Sample Conc	Dup Conc	RPD	QC Limit RPD
TOC	18.6	20.4	9.2	20

LABORATORY CONTROL SAMPLE
Batch # IW96022a
Results In mg/L (ppm)

Compound	True	Found	% Rec	QC Limit % Rec
TOC	10.0	10.8	108	91-114

LABORATORY CONTROL SAMPLE
Batch # IW96023a
Results In mg/L (ppm)

Compound	True	Found	% Rec	QC Limit % Rec
TOC	10.0	10.5	105	91-114

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

BATCH QUALITY CONTROL RESULTS
Oil & Grease per EPA 413.2

Client: Schnitzer Steel Industries, Inc.
Project:

NCA Project #: P604214
Received: 04/12/96

METHOD BLANK
Batch # FH96022b
Results In mg/L (ppm)

Compound	Result	MRL
Oil & Grease	ND	0.50
Date Prepared	04/18/96	
Date Analyzed	04/19/96	

LABORATORY CONTROL SAMPLE AND LABORATORY CONTROL SAMPLE DUPLICATE
Batch # FH96022a
Results In mg/L (ppm)

Compound	True	Found	% Rec
TPH	5.0	5.27	105

Compound	Dup True	Dup Found	Dup % Rec	RPD	QC Limit RPD	QC Limit % Rec
TPH	5.0	5.39	108	2.8	50	50-150

CHAIN OF CUSTODY RECORD

AMTEST

AmTest Inc.
Professional Analytical Services
9205 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

DATE: 3/5/96

Project Manager: Tim Todd
Company Name: SSI
Address: PO Box 10047
City, State, ZIP: Portland, OR 97210
Phone: 286-6944
FAX: 286-6948

P.O. # or Project Number:
Project Name:
Project Location: SSI-Pdx

Lab Project Number: 6602
Lab Location: R2-5
RUSH? YES (NO)

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE MATRIX	ANALYSIS REQUIRED
6602-	SW-2	H_2O	PCB-EPA 8080
			Cr, Cd, Pb-
			(total)
			& TPH-418.1

LAB USE ONLY
Additional Analyses:
Requested By:
Date:

Relinquished By	Date/Time	Received By	Date/Time
Timothy K. Todd	3/6/96 8:10	[illegible]	3/6/96 8:10
Relinquished By	Date/Time	Received By	Date/Time
Relinquished By	Date/Time	Received By	Date/Time

SCHN00245846

Columbia Analytical Services INC.

November 5, 1996

Service Request No: K9606885

Tim Todd
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97210

Re: SSP Project

Dear Tim:

Enclosed are the results of the sample(s) submitted to our laboratory on October 28, 1996. For your reference, these analyses have been assigned our service request number K9606885.

All analyses were performed consistent with our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 239.

Respectfully submitted,

Columbia Analytical Services, Inc.

Howard Boorse
Project Chemist

HB/amy

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 206/577-7222 • Fax 206/636-1068

COLUMBIA ANALYTICAL SERVICES, Inc.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

acronlst.lj/12/29/94

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Steel Products Co.	**Service Request No.:**	K9606885
Project:	SSP	**Date Received:**	10/28/96
Sample Matrix:	Soil		

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of Columbia Analytical Services, Inc. (CAS). This report contains analytical results for sample(s) designated for Tier I data deliverables. When appropriate to the method, method blank results have been reported with each analytical test. Surrogate recoveries have been reported for all applicable organic analyses.

All EPA recommended holding times have been met for analyses in this sample delivery group.

The following difficulties were experienced during analysis of this batch:

The surrogate recovery for EPA Method 8015M in samples SS2, SS3, SS4 and SS5 were not calculated. The analysis of these samples required a dilution which resulted in a surrogate concentration below the Method Reporting Limit (MRL). No further corrective action was taken.

Approved by_____ Date 11-4-96

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Steel Products Co.	**Service Request No.:**	K9606885
Project:	SSP	**Date Received:**	10/28/96
Sample Matrix:	Soil		

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of Columbia Analytical Services, Inc. (CAS). This report contains analytical results for sample(s) designated for Tier I data deliverables. When appropriate to the method, method blank results have been reported with each analytical test. Surrogate recoveries have been reported for all applicable organic analyses.

All EPA recommended holding times have been met for analyses in this sample delivery group.

The following difficulties were experienced during analysis of this batch:

The surrogate recovery for EPA Method 8015M in samples SS2, SS3, SS4 and SS5 were not calculated. The analysis of these samples required a dilution which resulted in a surrogate concentration below the Method Reporting Limit (MRL). No further corrective action was taken.

Approved by _____ Date 11-4-96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96

Total Solids

Prep Method:	NONE	Units:	PERCENT
Analysis Method:	160.3M	Basis:	NA
Test Notes:			

Sample Name	Lab Code	Date Analyzed	Result	Result Notes
SED1-675	K9606885-001	10/29/96	39.9	
SED2-500	K9606885-002	10/29/96	37.6	
SED3-100	K9606885-003	10/29/96	64.6	
SS1	K9606885-004	10/29/96	48.0	
SS2	K9606885-005	10/29/96	63.4	
SS3	K9606885-006	10/29/96	67.9	
SS4	K9606885-007	10/29/96	62.6	
SS5	K9606885-008	10/29/96	52.5	

Approved By: _____ Date: 10/30/96

Total Solids/060595

06885MA.AM1 - Sample 10/30/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Soil

Service Request: K9606885
Date Collected: 10/25/96
Date Received: 10/28/96
Date TCLP Performed: 11/1/96
Date Extracted: 11/4/96

Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

			Sample Name:	**SED1-675**	**SED2-500**	**SED3-100**
			Lab Code:	K9606885-001	K9606885-002	K9606885-003
			Date Analyzed:	11/4/96	11/4/96	11/4/96
Analyte	**EPA Method**	**MRL**	**Regulatory Limit***			
Arsenic	3010A/6010A	0.1	5	ND	ND	ND
Barium	3010A/6010A	0.5	100	ND	ND	ND
Cadmium	3010A/6010A	0.01	1	ND	ND	ND
Chromium	3010A/6010A	0.01	5	ND	ND	ND
Lead	3010A/6010A	0.05	5	ND	ND	ND
Mercury	7470	0.001	0.2	ND	ND	ND
Selenium	3010A/6010A	0.1	1	ND	ND	ND
Silver	3010A/6010A	0.01	5	ND	ND	ND

* From 40 CFR Part 261, et al., and *Federal Register*, March 29, 1990 and June 29, 1990.

Approved By: Emma Date: 11/4/96

TCLP/102194
06885ICP.EA1 - Sample 11/4/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96
		Date TCLP Performed:	11/1/96
		Date Extracted:	11/4/96

Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

			Sample Name:	SS1	SS2	SS3
			Lab Code:	K9606885-004	K9606885-005	K9606885-006
			Date Analyzed:	11/4/96	11/4/96	11/4/96
Analyte	**EPA Method**	**MRL**	**Regulatory Limit***			
Arsenic	3010A/6010A	0.1	5	ND	ND	0.06
Barium	3010A/6010A	0.5	100	0.8	1.1	0.9
Cadmium	3010A/6010A	0.01	1	ND	ND	ND
Chromium	3010A/6010A	0.01	5	ND	ND	0.01
Lead	3010A/6010A	0.05	5	ND	ND	ND
Mercury	7470	0.001	0.2	ND	ND	ND
Selenium	3010A/6010A	0.1	1	ND	ND	ND
Silver	3010A/6010A	0.01	5	ND	ND	ND

* From 40 CFR Part 261, et al., and *Federal Register*, March 29, 1990 and June 29, 1990.

Approved By: Emma Date: 11/4/96

TCLP/102194
068885ICP.EA1 - Sample (2) 11/4/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Soil

Service Request: K9606885
Date Collected: 10/25/96
Date Received: 10/28/96
Date TCLP Performed: 11/1/96
Date Extracted: 11/4/96

Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

			Sample Name:	SS4	SS5	**Method Blank**
			Lab Code:	K9606885-007	K9606885-008	K9606885-MB
			Date Analyzed:	11/4/96	11/4/96	11/4/96
Analyte	**EPA Method**	**MRL**	**Regulatory Limit***			
Arsenic	3010A/6010A	0.1	5	ND	ND	ND
Barium	3010A/6010A	0.5	100	1.1	1.0	ND
Cadmium	3010A/6010A	0.01	1	0.02	ND	ND
Chromium	3010A/6010A	0.01	5	ND	ND	ND
Lead	3010A/6010A	0.05	5	ND	ND	ND
Mercury	7470	0.001	0.2	ND	ND	ND
Selenium	3010A/6010A	0.1	1	ND	ND	ND
Silver	3010A/6010A	0.01	5	ND	ND	ND

* From 40 CFR Part 261, et al., and *Federal Register*, March 29, 1990 and June 29, 1990.

Approved By: SMA Date: 11/4/96

TCLP/102194
06885ICP.EA1 - Sample (3) 11/4/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96
		Date Extracted:	11/1/96

Hydrocarbon Scan
EPA Methods 3550A/8015 Modified
Units: mg/Kg (ppm)
Dry Weight Basis

	Sample Name:	**SED1-675**	**SED2-500**	**SED3-100**
	Lab Code:	K9606885-001	K9606885-002	K9606885-003
	Date Analyzed:	11/1/96	11/1/96	11/1/96
Analyte	**MRL**			
Gasoline	10	ND	ND	ND
Mineral Spirits	10	ND	ND	ND
Jet Fuel	10	ND	ND	ND
Kerosene	10	ND	ND	ND
Diesel	10	ND	2340	ND
Other*	20	1010	1040	99

* Quantified using 30-weight motor oil as a standard.

Approved By: Linda Neuneker Date: 11-4-96

3S22/102094
06885PHC.SS1 - 8015s 11/4/96

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96
		Date Extracted:	11/1/96

Hydrocarbon Scan
EPA Methods 3550A/8015 Modified
Units: mg/Kg (ppm)
Dry Weight Basis

	Sample Name:	**SS1**	**SS2**	**SS3**
	Lab Code:	K9606885-004	K9606885-005	K9606885-006
	Date Analyzed:	11/1/96	11/2/96	11/2/96
Analyte	**MRL**			
Gasoline	10	ND	ND	ND
Mineral Spirits	10	ND	ND	ND
Jet Fuel	10	ND	ND	ND
Kerosene	10	ND	ND	ND
Diesel	10	ND	ND	ND
Other*	20	7870	14000	2000

* Quantified using 30-weight motor oil as a standard.

Approved By: Sonda Neuneker Date: 11-4-96

3S22/102094
06885PHC.SS1 - 8015s (2) 11/4/96

SCHN00245856

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96
		Date Extracted:	11/1/96

Hydrocarbon Scan
EPA Methods 3550A/8015 Modified
Units: mg/Kg (ppm)
Dry Weight Basis

	Sample Name:	SS4	SS5	**Method Blank**
	Lab Code:	K9606885-007	K9606885-008	K961101-MB
	Date Analyzed:	11/2/96	11/2/96	11/1/96
Analyte	**MRL**			
Gasoline	10	ND	ND	ND
Mineral Spirits	10	ND	ND	ND
Jet Fuel	10	ND	ND	ND
Kerosene	10	ND	ND	ND
Diesel	10	ND	ND	ND
Other*	20	32000	11000	ND

* Quantified using 30-weight motor oil as a standard.

Approved By: Linda Neuneker Date: 11-4-96

3S22/102094
06885FHC.SS1 - 8015s (3) 11/4/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96
		Date TCLP Performed:	11/1/96
		Date Extracted:	11/4/96
		Date Analyzed:	11/4/96

Matrix Spike Summary
Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

Sample Name: SED1-675
Lab Code: K9606885-001

Analyte	Spike Level	Sample Result	Spiked Sample Result	Percent Recovery*
Arsenic	5	ND	5.1	102
Barium	5	ND	5.4	108
Cadmium	1	ND	0.93	93
Chromium	5	ND	4.81	96
Lead	5	ND	4.70	94
Mercury	0.01	ND	0.009	90
Selenium	1	ND	1.0	100
Silver	1	ND	0.92	92

* Percent recovery information is provided in order to assess the performance of the method on this matrix.

Approved By: EMA Date: 11/4/96

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9606885
Project:	SSP	**Date Collected:**	10/25/96
Sample Matrix:	Soil	**Date Received:**	10/28/96
		Date Extracted:	11/1/96
		Date Analyzed:	11/1,2/96

Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3550A/8015 Modified

Sample Name	**Lab Code**	**Percent Recovery** o-Terphenyl
SED1-675	K9606885-001	82
SED2-500	K9606885-002	65
SED3-100	K9606885-003	72
SS1	K9606885-004	74
SS2	K9606885-005	NA
SS3	K9606885-006	NA
SS4	K9606885-007	NA
SS5	K9606885-008	NA
Method Blank	K961101-MB	70

CAS Acceptance Limits: 56-116

NA Not Applicable; see case narrative.

Approved By: Sonda Neuneker Date: 11-4-96

SUR1/111594
06885PHC.SS1 - 8015sSUR 11/4/96

Columbia Analytical Services inc.

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

DATE 10/25/96 PAGE 1 OF 1

PROJECT NAME SSP #

PROJECT MANAGER Tim Todd

COMPANY/ADDRESS Schnitzer Steel Products
PO Box 10047
Portland, OR 97210 PHONE 503/286-6944

SAMPLERS SIGNATURE Timothy R. Todd

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neu/Acid Organics GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020 ☐	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA418.1 ☐ ORA418.1 ☐ WA418.1 ☐	TPH/Gas/BTEX Gas ☐ BTEX ☐ 503/8015/8020	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☐	TPH/HCID ☐ WA/HCID ☐ ORHCID ☐	TCLP Metals ☐ VOA ☐ Semi Pest/ VOA ☐ Herb ☐	Metals (total or dissolved) List Below	Cyanide	pH, Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3 (circle)	NH_3-N, COD, Total-P, TKN, TOC (circle)	Total Organic Halides (TOX) 9020 ☐ (AOX)	1650A ☐			REMARKS
SED1-675	10/25	0940	6885-1	Soil	1								X		X								
SED2-500		0955	2										X		X								
SED3-100		1015	3										X		X								
SS1		1305	4										X		X								
SS2		1315	5										X		X								
SS3		1320	6										X		X								
SS4		1325	7										X		X								
SS5		1330	8										X		X								

RELINQUISHED BY:
Signature: Timothy R. Todd
Printed Name: Timothy Todd
Firm: SSP
Date/Time: 10/28/96 1000

RECEIVED BY:
Signature: [illegible]
Printed Name: [illegible]
Firm: [illegible]
Date/Time: 10/29/96 730

TURNAROUND REQUIREMENTS
___ 24 hr ___ 48 hr. ___ 5 day
___ Standard (10-15 working days)
___ Provide Verbal Preliminary Results
___ Provide FAX preliminary Results
Requested Report Date _____

REPORT REQUIREMENTS
X I. Routine Report
___ II. Report (includes DUP,MS, MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O.# 28341
Bill To Same as above
attn: Tim Todd

SAMPLE RECEIPT:
Shipping VIA: _____
Shipping #: _____
Condition: _____
Lab No: K9606885

RELINQUISHED BY:
Signature
Printed Name
Firm
Date/Time

RECEIVED BY:
Signature
Printed Name
Firm
Date/Time

SPECIAL INSTRUCTIONS/COMMENTS:

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

SCHN00245860

AMTEST

AmTest Inc.

Professional
Analytical
Services

9205 SW Nimbus Ave.
Beaverton, OR
97008

Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

C
L Tim Todd
I Schnitzer Steel Industries, Inc.
E P.O. Box 10047
N Portland OR 97210
T

Date Received: 3/6/96
Date Analyzed: 3/12/96
Date Reported: 3/13/96
Job Number: 6602
Page: 1

Project - SSI PDX
Sample Type - Water

Lab Number	6602			
Client Identification	SW-2	Detection	Blank	
Analysis		Limit		
	mg/L (ppm)	mg/L (ppm)	mg/L (ppm)	
EPA-418.1	45.4	1.0	ND	
PCB's (EPA 8080)				
Arochlor 1016	ND	0.001	ND	
Arochlor 1221	ND	0.001	ND	
Arochlor 1232	ND	0.001	ND	
Arochlor 1242	ND	0.001	ND	
Arochlor 1248	ND	0.001	ND	
Arochlor 1254	ND	0.001	ND	
Arochlor 1260	ND	0.001	ND	
				Blank Spike
Metals(EPA 7000)				% Recovery
Cadmium	0.10	0.001	ND	100
Chromium	0.13	0.002	ND	93
Lead	2.0	0.4	ND	91

ND = None Detected

Reported By

QA Check

Greg Bolt
Laboratory Manager

SCHN00245861

AMTEST

AmTest Inc.

Professional
Analytical
Services

9205 SW Nimbus Ave.
Beaverton, OR
97008

Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

CLIENT
Tim Todd
Schnitzer Steel Industries, Inc.
P.O. Box 10047
Portland OR 97210

Date Received: 11/28/95
Date Analyzed: 12/4/95
Date Reported: 12/5/95
Job Number: 33204-16
Page: 1

Analysis - Metals (EPA 7000 Series)
Sample Type - Water

Project - Stormwater Permit 1200R

Results mg/L (ppm)

Lab Sample Number	33204	33205	33206	33207	33208	33209	33210	33210 Duplicate	33211	Detection
Client Identification	#2	#3	#4	#5	#6	#7	~~#9~~ 11	~~#9~~ 11	~~#10~~ 12	Limit
Metal										mg/L (ppm)
Arsenic	ND	ND	ND	ND	ND	ND	ND	ND	0.07	0.01
Cadmium	0.007	ND	ND	ND	ND	ND	ND	ND	0.029	0.002
Chromium	0.18	0.01	0.02	0.05	ND	0.03	0.03	0.03	1.0	0.01
Lead	0.78	0.05	0.05	0.22	0.02	0.05	0.09	0.10	3.3	0.01
Mercury	0.0014	ND	ND	0.0006	ND	ND	0.0004		0.012	0.0002
Nickel	ND	ND	ND	ND	ND	ND	ND	ND	0.35	0.1
Zinc	5.3	0.24	0.18	0.54	0.05	0.15	0.20	0.21	10	0.05
Copper	0.42	0.06	0.02	0.12	ND	0.02	0.07	0.06	3.1	0.01

ND = None Detected

Reported By

QA Check

Greg Bolt
Laboratory Manager

NET NATIONAL ENVIRONMENTAL TESTING, INC.

Portland Division
17400 SW Upper Boones Ferry Rd.
Suite #260
Portland, OR 97224
Tel: (503) 624-6449
Fax: (503) 639-6889

John Simpson
Spencer Environmental
P.O. Box 5207
914 S. Molalla Avenue
Oregon City, OR 97045

Date: 02/23/1996
NET Account No.: 24400
NET Job Number: 96.00409

Project: Schnitzer Steel
Location: Schnitzer Steel

Sample analysis in support of the project referenced above has been completed and results are presented on the following pages. Should you have questions regarding procedures or results, please feel welcome to contact Client Services.

Sample Number	Sample Description	Matrix Type	Date Taken	Date Received
59976	021668T-1	SLUDGE	02/16/1996	02/19/1996
59977	021668T-2	MISC. LIQUID	02/16/1996	02/19/1996
59978	021668T-3	SLUDGE	02/16/1996	02/19/1996

Post-it® Fax Note 7671	Date 2/23	# of pages ▶
To JOHN S.	From E	
Co./Dept.	Co.	
Phone #	Phone #	
Fax #	Fax #	

Approved by:

Marty French
NET, INC. Division Manager

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ANALYTICAL REPORT

Kevin Freeman
Spencer Environmental
Services, Inc.
15770 Beaver Glen Drive
Oregon City, OR 97045

01/13/1994
Job No.: 94.00013

Page: 2

Project Name: Schnitzer Steel Maintenance
Date Received: 01/05/1994

Sample Number	Sample Description
20969	1LB

PARAMETERS	METHODS	RESULTS	REPORT LIMIT	UNITS	DATE ANALYZED	FLAG
TCLP EXTRACTION PREP	1311	-			01/11/1994	
TCLP - Arsenic, ICP	6010	ND	0.5	mg/L	01/12/1994	
TCLP - Barium, ICP	6010	1.79	1.0	mg/L	01/12/1994	
TCLP - Cadmium, ICP	6010	ND	0.1	mg/L	01/12/1994	
TCLP - Chromium, ICP	6010	ND	0.5	mg/L	01/12/1994	
TCLP - Lead, ICP	6010	ND	1.0	mg/L	01/12/1994	
TCLP - Mercury	7470	ND	0.0002	mg/L	01/07/1994	
TCLP - Selenium, ICP	6010	ND	0.7	mg/L	01/12/1994	
TCLP - Silver, ICP	6010	ND	0.1	mg/L	01/12/1994	
8240 VOLATILES (S)						
Dilution Factor		20	-		01/07/1994	
Acetone	8240	ND	0.4	mg/Kg	01/07/1994	
Benzene	8240	ND	0.1	mg/Kg	01/07/1994	
Bromodichloromethane	8240	ND	0.1	mg/Kg	01/07/1994	
Bromoform	8240	ND	0.1	mg/Kg	01/07/1994	
Bromomethane	8240	ND	0.1	mg/Kg	01/07/1994	
2-Butanone	8240	ND	0.4	mg/Kg	01/07/1994	
Carbon Disulfide	8240	ND	0.1	mg/Kg	01/07/1994	
Carbon Tetrachloride	8240	ND	0.1	mg/Kg	01/07/1994	
Chlorobenzene	8240	ND	0.1	mg/Kg	01/07/1994	
Chloroethane	8240	ND	0.1	mg/Kg	01/07/1994	
2-Chloroethylvinyl ether	8240	ND	0.4	mg/Kg	01/07/1994	
Chloroform	8240	ND	0.1	mg/Kg	01/07/1994	
Chloromethane	8240	ND	0.1	mg/Kg	01/07/1994	
Dibromochloromethane	8240	ND	0.1	mg/Kg	01/07/1994	
1,2-Dichlorobenzene	8240	ND	0.1	mg/Kg	01/07/1994	
1,3-Dichlorobenzene	8240	ND	0.1	mg/Kg	01/07/1994	
1,1-Dichloroethane	8240	ND	0.1	mg/Kg	01/07/1994	
1,2-Dichloroethane	8240	ND	0.1	mg/Kg	01/07/1994	
1,1-Dichloroethene	8240	ND	0.1	mg/Kg	01/07/1994	
1,2-Dichloroethene (total)	8240	ND	0.1	mg/Kg	01/07/1994	
1,2-Dichloropropane	8240	ND	0.1	mg/Kg	01/07/1994	
cis-1,3-Dichloropropene	8240	ND	0.1	mg/Kg	01/07/1994	
trans-1,3-Dichloropropene	8240	ND	0.1	mg/Kg	01/07/1994	
Ethylbenzene	8240	ND	0.1	mg/Kg	01/07/1994	
2-Hexanone	8240	ND	0.4	mg/Kg	01/07/1994	
Methylene Chloride	8240	ND	1.0	mg/Kg	01/07/1994	
4-Methyl-2-Pentanone	8240	2.5	0.4	mg/Kg	01/07/1994	
Styrene	8240	ND	0.1	mg/Kg	01/07/1994	

NET

ANALYTICAL REPORT

Kevin Freeman
Spencer Environmental
Services, Inc.
15770 Beaver Glen Drive
Oregon City, OR 97045

01/13/1994
Job No.: 94.00013

Page: 3

Project Name: Schnitzer Steel Maintenance
Date Received: 01/05/1994

Sample Number	Sample Description
20969	1LB

PARAMETERS	METHODS	RESULTS	REPORT LIMIT	UNITS	DATE ANALYZED	FLAG
1,1,2,2-Tetrachloroethane	8240	ND	0.1	mg/Kg	01/07/1994	
Tetrachloroethene	8240	ND	0.1	mg/Kg	01/07/1994	
Toluene	8240	ND	0.1	mg/Kg	01/07/1994	
1,1,1-Trichloroethane	8240	ND	0.1	mg/Kg	01/07/1994	
1,1,2-Trichloroethane	8240	ND	0.1	mg/Kg	01/07/1994	
Trichloroethene	8240	ND	0.1	mg/Kg	01/07/1994	
Trichlorofluoromethane	8240	ND	0.1	mg/Kg	01/07/1994	
Vinyl Acetate	8240	ND	0.4	mg/Kg	01/07/1994	
Vinyl Chloride	8240	ND	0.1	mg/Kg	01/07/1994	
Xylenes, total	8240	1.0	0.1	mg/Kg	01/07/1994	

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SURROGATE REPORT

Kevin Freeman
Spencer Environmental
Services, Inc.
15770 Beaver Glen Drive
Oregon City, OR 97045

01/13/1994
Job No.: 94.00013

Page: 4

Project Name: Schnitzer Steel Maintenance
Date Received: 01/05/1994

SURROGATES	METHODS	RESULTS		DATE ANALYZED
Sample Number: 20969 — Sample Description: 1LB				
1,2-Dichloroethane-d4 (Surr.)	8240	101	%	01/07/1994
Toluene-d8 (Surr.)	8240	100	%	01/07/1994
Bromofluorobenzene (Surr.)	8240	99	%	01/07/1994

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QUALITY CONTROL REPORT
CONTINUING CALIBRATION VERIFICATION

Spencer Environmental
Services, Inc.
15770 Beaver Glen Drive
Oregon City, OR 97045

Date: 01/13/1994

NET Job Number: 94.00013

Contact: Kevin Freeman
Project: Schnitzer Steel Maintenance

Analyte	CCV True Concentration	Concentration Found	Percent Recovery	Date Analyzed
TCLP - Arsenic, ICP	2.0	2.06	103.0	01/11/1994
TCLP - Barium, ICP	2.00	2.08	104.0	01/11/1994
TCLP - Cadmium, ICP	2.00	2.00	100.0	01/11/1994
TCLP - Chromium, ICP	2.00	1.99	99.5	01/11/1994
TCLP - Lead, ICP	2.00	1.91	95.5	01/11/1994
TCLP - Mercury	0.00050	0.000507	101.4	01/07/1994
TCLP - Selenium, ICP	2.00	2.04	102.0	01/11/1994
TCLP - Silver, ICP	2.00	1.99	99.5	01/11/1994
8240 VOLATILES (8)				
Benzene	50	49.6	99.2	01/07/1994
Chlorobenzene	50	50.7	101.4	01/07/1994
1,1-Dichloroethene	50	50.1	100.2	01/07/1994
Toluene	50	49.8	99.6	01/07/1994
Trichloroethene	50	49.1	98.2	01/07/1994
1,2-Dichloroethane-d4 (Surr.)	50	49.1	98.2	01/07/1994
Toluene-d8 (Surr.)	50	48.9	97.8	01/07/1994
Bromofluorobenzene (Surr.)	50	47.8	95.6	01/07/1994

CCV - Continuing Calibration Verification

NATIONAL ENVIRONMENTAL TESTING, INC.

CHAIN OF CUSTODY RECORD

COMPANY [illegible]
ADDRESS [illegible]
PHONE [illegible] FAX
PROJECT NAME/LOCATION [illegible]
PROJECT NUMBER [illegible]
PROJECT MANAGER

REPORT TO: [illegible]
INVOICE TO:
P.O. NO. [illegible]
NET QUOTE NO.

SAMPLED BY: S. [illegible]
(PRINT NAME) SIGNATURE [illegible]
(PRINT NAME) SIGNATURE

ANALYSES

DATE	TIME	SAMPLE ID/DESCRIPTION	GRAB	COMP	# OF CONTAINERS TYPE	MATRIX	PRESERVED TYPE										COMMENTS
[illegible]	1305	[illegible]						[illegible]	[illegible]								
		[illegible]															

CONDITION OF SAMPLE: BOTTLES INTACT? YES / NO
FIELD FILTERED? YES / NO
COC SEALS PRESENT AND INTACT? YES / NO
VOLATILES FREE OF HEADSPACE? YES / NO
TEMPERATURE UPON RECEIPT:

SAMPLE REMAINDER DISPOSAL: RETURN SAMPLE REMAINDER TO CLIENT VIA
I REQUEST NET TO DISPOSE OF ALL SAMPLE REMAINDERS DATE

RELINQUISHED BY:	DATE/TIME	RECEIVED BY:	RELINQUISHED BY:	DATE/TIME	RECEIVED FOR NET BY:
[illegible]	[illegible]				[illegible]

METHOD OF SHIPMENT

REMARKS:

PT 1 - ORIGINAL - WHITE PT 2 - NET PROJECT MANAGER - YELLOW PT 3 - CUSTOMER COPY - PINK

JAN 09 '97 04:03PM SPENCER ENVIRO, P.18

SCHN00245868

AMTEST

AmTest Inc.

Professional
Analytical
Services

9205 SW Nimbus Ave.
Beaverton, OR
97008

Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

CLIENT
Tim Todd
Schnitzer Steel Industries, Inc.
P.O. Box 10047
Portland OR 97210

Date Received: 11/28/95
Date Analyzed: 12/4/95
Date Reported: 12/5/95
Job Number: 33204-16
Page: 2

Analysis - Metals (EPA 7000 Series)
Sample Type - Water

Project - Stormwater Permit 1200R

Results mg/L (ppm)

Lab Sample Number	33212	33213	33214	33215	33216	Detection		Blank
Client Identification	~~#11~~	~~#12~~	~~#13~~	~~#14~~	~~#15~~	Limit	Blank	Spike
Metal	14	15	16	17	18	mg/L (ppm)	mg/L (ppm)	% Recovery
Arsenic	0.02	ND	ND	ND	ND	0.01	ND	89
Cadmium	0.010	0.003	ND	ND	ND	0.002	ND	117
Chromium	0.45	0.03	0.01	0.06	0.03	0.01	ND	92
Lead	1.2	0.33	0.05	0.09	0.11	0.01	ND	99
Mercury	0.0046	0.0004	ND	ND	0.0008	0.0002	ND	99
Nickel	ND	ND	ND	ND	ND	0.1	ND	85
Zinc	4.1	0.54	0.15	0.26	0.30	0.05	ND	95
Copper	0.64	0.15	0.03	0.09	0.07	0.01	ND	105

ND = None Detected

Reported By

QA Check

Greg Bolt
Laboratory Manager

SCHN00245869

AMTEST

AmTest Inc.

Professional
Analytical
Services

9205 SW Nimbus Ave.
Beaverton, OR
97008

Tel 503 626 7424
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ANALYSIS REPORT

C
L Tim Todd
I Schnitzer Steel Industries, Inc.
E P.O. Box 10047
N Portland OR 97210
T

Date Received: 11/28/95
Date Analyzed: 11/28/95
Date Reported: 12/7/95
Job Number: 33204-16
Page: 3

Project - Stormwater Permit 1200R
Sample Type - Water

Lab Number	33204	33205	33206	33207	
Client Identification	#2	#3	#4	#5	Detection
Analysis					Limit
pH (EPA 150.1)	7.6	7.5	7.0	8.5	
Oil & Grease (EPA 413.1)	11 mg/L	ND	ND	6.0 mg/L	3.0 mg/L
TSS (EPA 160.2)	420 mg/L	27 mg/L	64 mg/L	280 mg/L	5 mg/L
COD (EPA 410.4)	280 mg/L	13 mg/L	24 mg/L	120 mg/L	10 mg/L
Conductivity (EPA 120.1)	540 umhs/cm	32 umhs/cm	37 umhs/cm	120 umhs/cm	
TOC (EPA 415.1)	97 mg/L	1.7 mg/L	5.6 mg/L	22 mg/L	1 mg/L

ND = None Detected

Reported By Meg O'Keeley

QA Check GB

Greg Bolt
Laboratory Manager

SCHN00245870

AMTEST

AmTest Inc.

Professional
Analytical
Services

9205 SW Nimbus Ave.
Beaverton, OR
97008

Tel 503 626 7424
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ANALYSIS REPORT

C
L Tim Todd
I Schnitzer Steel Industries, Inc.
E P.O. Box 10047
N Portland OR 97210
T

Date Received: 11/28/95
Date Analyzed: 11/28/95
Date Reported: 12/7/95
Job Number: 33204-16
Page: 4

Project - Stormwater Permit 1200R
Sample Type - Water

Lab Number	33208	33209	33210	33211	
Client Identification	#6	#7	~~#9~~ 11	~~#10~~ 12	Detection Limit
Analysis					
pH (EPA 150.1)	7.3	9.1	9.1	7.3	
Oil & Grease (EPA 413.1)	ND	4.0 mg/L	3.0 mg/L	6.0 mg/L	3.0 mg/L
TSS (EPA 160.2)	24 mg/L	250 mg/L	200 mg/L	1900 mg/L	5 mg/L
COD (EPA 410.4)	12 mg/L	42 mg/L	27 mg/L	400 mg/L	10 mg/L
Conductivity (EPA 120.1)	48 umhs/cm	52 umhs/cm	48 umhs/cm	510 umhs/cm	
TOC (EPA 415.1)	3.7 mg/L	16 mg/L	12 mg/L	130 mg/L	1 mg/L

ND = None Detected

Reported By Hugh Mealy

QA Check GB

Greg Bolt
Laboratory Manager

SCHN00245871

AMTEST

AmTest Inc.
Professional Analytical Services
9205 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

C
L Tim Todd
I Schnitzer Steel Industries, Inc.
E P.O. Box 10047
N Portland OR 97210
T

Date Received: 11/28/95
Date Analyzed: 11/28/95
Date Reported: 12/7/95
Job Number: 33204-16
Page: 5

Project - Stormwater Permit 1200R
Sample Type - Water

Lab Number	33212	33213	33214	33215	
Client Identification	~~#11~~ 14	~~#12~~ 15	~~#13~~ 16	~~#14~~ 17	Detection
Analysis					Limit
pH (EPA 150.1)	8.8	7.9	7.4	8.9	
Oil & Grease (EPA 413.1)	14 mg/L	27 mg/L	ND	ND	3.0 mg/L
TSS (EPA 160.2)	460 mg/L	56 mg/L	17 mg/L	130 mg/L	5 mg/L
COD (EPA 410.4)	150 mg/L	47 mg/L	40 mg/L	25 mg/L	10 mg/L
Conductivity (EPA 120.1)	290 umhs/cm	130 umhs/cm	430 umhs/cm	31 umhs/cm	
TOC (EPA 415.1)	47 mg/L	32 mg/L	18 mg/L	9.9 mg/L	1 mg/L

ND = None Detected

Reported By Hugh Healey
QA Check GB

Greg Bolt
Greg Bolt
Laboratory Manager

AMTEST

AmTest Inc.

Professional
Analytical
Services

9205 SW Nimbus Ave.
Beaverton, OR
97008

Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

C
L Tim Todd
I Schnitzer Steel Industries, Inc.
E P.O. Box 10047
N Portland OR 97210
T

Date Received: 11/28/95
Date Analyzed: 11/28/95
Date Reported: 12/7/95
Job Number: 33204-16
Page: 6

Project - Stormwater Permit 1200R
Sample Type - Water

Lab Number	33216			
Client Identification	~~#15~~ 18	Detection	Method	Spike
Analysis		Limit	Blank	% Recovery
pH (EPA 150.1)	7.6			
Oil & Grease (EPA 413.1)	4.0 mg/L	3.0 mg/L	ND	106
TSS (EPA 160.2)	41 mg/L	5 mg/L	ND	
COD (EPA 410.4)	90 mg/L	10 mg/L	ND	98
Conductivity (EPA 120.1)	550 umhs/cm			
TOC (EPA 415.1)	35 mg/L	1 mg/L	ND	

ND = None Detected

Reported By Hugh Healey

QA Check GB

Greg Bolt
Laboratory Manager

AMTEST

AmTest Inc.

Professional
Analytical
Services

9205 SW Nimbus Ave.
Beaverton, OR
97005

Tel 503 626 7424
Fax 503 643 1460

FAX COVER SHEET

Date: 12/8

To: Tim Todd

Company: Schnitzer Steel

FAX #: 286-6948

From: Greg Bart
Amtest Beaverton
Phone: 503-626-7424
Fax: 503-643-1460

Number of pages including cover sheet: 9

SUBJECT: results

AMTEST

AmTest Inc.
Professional Analytical Services
9205 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

CLIENT
Tim Todd
Schnitzer Steel Industries, Inc.
P.O. Box 10047
Portland OR 97210

Date Received: 11/28/95
Date Analyzed: 12/4/95
Date Reported: 12/5/95
Job Number: 33204-16
Page: 1

Analysis - Metals (EPA 7000 Series)
Sample Type - Water

Project - Stormwater Permit 1200R

Results mg/L (ppm)

Lab Sample Number	33204	33205	33206	33207	33208	33209	33210	33210 Duplicate	33211	Detection
Client Identification	#2	#3	#4	#5	#6	#7	#9	#9	#10	Limit
Metal										mg/L (ppm)
Arsenic	ND	ND	ND	ND	ND	ND	ND	ND	0.07	0.01
Cadmium	0.007	ND	ND	ND	ND	ND	ND	ND	0.029	0.002
Chromium	0.18	0.01	0.02	0.05	ND	0.03	0.03	0.03	1.0	0.01
Lead	0.78	0.05	0.05	0.22	0.02	0.05	0.09	0.10	3.3	0.01
Mercury	0.0014	ND	ND	0.0006	ND	ND	0.0004		0.012	0.0002
Nickel	ND	ND	ND	ND	ND	ND	ND	ND	0.35	0.1
Zinc	5.3	0.24	0.18	0.54	0.05	0.15	0.20	0.21	10	0.05
Copper	0.42	0.06	0.02	0.12	ND	0.02	0.07	0.06	3.1	0.01

ND = None Detected

Reported By

QA Check

Greg Bolt
Laboratory Manager

AMTEST

AmTest Inc.
Professional Analytical Services
9205 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

CLIENT
Tim Todd
Schnitzer Steel Industries, Inc.
P.O. Box 10047
Portland OR 97210

Date Received: 11/28/95
Date Analyzed: 12/4/95
Date Reported: 12/5/95
Job Number: 33204-16
Page: 2

Analysis - Metals (EPA 7000 Series)
Sample Type - Water

Project - Stormwater Permit 1200R

Results mg/L (ppm)

Lab Sample Number	33212	33213	33214	33215	33216	Detection		Blank
Client Identification	#11	#12	#13	#14	#15	Limit	Blank	Spike
Metal						mg/L (ppm)	mg/L (ppm)	% Recovery
Arsenic	0.02	ND	ND	ND	ND	0.01	ND	89
Cadmium	0.010	0.003	ND	ND	ND	0.002	ND	117
Chromium	0.45	0.03	0.01	0.06	0.03	0.01	ND	92
Lead	1.2	0.33	0.05	0.09	0.11	0.01	ND	99
Mercury	0.0046	0.0004	ND	ND	0.0008	0.0002	ND	99
Nickel	ND	ND	ND	ND	ND	0.1	ND	85
Zinc	4.1	0.54	0.15	0.26	0.30	0.05	ND	95
Copper	0.64	0.15	0.03	0.09	0.07	0.01	ND	105

ND = None Detected

Reported By

QA Check

Greg Bolt
Laboratory Manager

AMTEST

AmTest Inc.
Professional Analytical Services
9205 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

C
L Tim Todd
I Schnitzer Steel Industries, Inc.
E P.O. Box 10047
N Portland OR 97210
T

Date Received: 11/28/95
Date Analyzed: 11/28/95
Date Reported: 12/7/95
Job Number: 33204-16
Page: 3

Project - Stormwater Permit 1200R
Sample Type - Water

Lab Number	33204	33205	33206	33207	
Client Identification	#2	#3	#4	#5	Detection
Analysis					Limit
pH (EPA 150.1)	7.6	7.5	7.0	8.5	
Oil & Grease (EPA 413.1)	11 mg/L	ND	ND	6.0 mg/L	3.0 mg/L
TSS (EPA 160.2)	420 mg/L	27 mg/L	64 mg/L	280 mg/L	5 mg/L
COD (EPA 410.4)	280 mg/L	13 mg/L	24 mg/L	120 mg/L	10 mg/L
Conductivity (EPA 120.1)	540 umhs/cm	32 umhs/cm	37 umhs/cm	120 umhs/cm	
TOC (EPA 415.1)	97 mg/L	1.7 mg/L	5.6 mg/L	22 mg/L	1 mg/L

ND = None Detected

Reported By

QA Check

Greg Bolt
Laboratory Manager

AMTEST

AmTest Inc.
Professional Analytical Services
9205 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

CLIENT
Tim Todd
Schnitzer Steel Industries, Inc.
P.O. Box 10047
Portland OR 97210

Date Received: 11/28/95
Date Analyzed: 11/28/95
Date Reported: 12/7/95
Job Number: 33204-16
Page: 4

Project - Stormwater Permit 1200R
Sample Type - Water

Lab Number	33208	33209	33210	33211	
Client Identification	#6	#7	#9	#10	Detection
Analysis					Limit
pH (EPA 150.1)	7.3	9.1	9.1	7.3	
Oil & Grease (EPA 413.1)	ND	4.0 mg/L	3.0 mg/L	6.0 mg/L	3.0 mg/L
TSS (EPA 160.2)	24 mg/L	250 mg/L	200 mg/L	1900 mg/L	5 mg/L
COD (EPA 410.4)	12 mg/L	42 mg/L	27 mg/L	400 mg/L	10 mg/L
Conductivity (EPA 120.1)	48 umhs/cm	62 umhs/cm	48 umhs/cm	510 umhs/cm	
TOC (EPA 415.1)	3.7 mg/L	16 mg/L	12 mg/L	130 mg/L	1 mg/L

ND = None Detected

Reported By Hugh Healy
QA Check GB

Greg Bolt
Laboratory Manager

AMTEST

AmTest Inc.
Professional Analytical Services
9205 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

C
L Tim Todd
I Schnitzer Steel Industries, Inc.
E P.O. Box 10047
N Portland OR 97210
T

Date Received: 11/28/95
Date Analyzed: 11/28/95
Date Reported: 12/7/95
Job Number: 33204-16
Page: 5

Project - Stormwater Permit 1200R
Sample Type - Water

Lab Number	33212	33213	33214	33215	
Client Identification	#11	#12	#13	#14	Detection Limit
Analysis					
pH (EPA 150.1)	8.8	7.9	7.4	8.9	
Oil & Grease (EPA 413.1)	14 mg/L	27 mg/L	ND	ND	3.0 mg/L
TSS (EPA 160.2)	460 mg/L	56 mg/L	17 mg/L	130 mg/L	5 mg/L
COD (EPA 410.4)	150 mg/L	47 mg/L	40 mg/L	26 mg/L	10 mg/L
Conductivity (EPA 120.1)	290 umhs/cm	130 umhs/cm	430 umhs/cm	31 umhs/cm	
TOC (EPA 415.1)	47 mg/L	32 mg/L	18 mg/L	9.9 mg/L	1 mg/L

ND = None Detected

Reported By [signature]

QA Check GD

[signature]
Greg Bolt
Laboratory Manager

AMTEST

AmTest Inc.
Professional Analytical Services
9205 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 642 1460

ANALYSIS REPORT

C
L Tim Todd
I Schnitzer Steel Industries, Inc.
E P.O. Box 10047
N Portland OR 97210
T

Date Received: 11/28/95
Date Analyzed: 11/28/95
Date Reported: 12/7/95
Job Number: 33204-16
Page: 6

Project - Stormwater Permit 1200R
Sample Type - Water

Lab Number	33216			
Client Identification	#15	Detection	Method	Spike
Analysis		Limit	Blank	% Recovery
pH (EPA 150.1)	7.6			
Oil & Grease (EPA 413.1)	4.0 mg/L	3.0 mg/L	ND	106
TSS (EPA 160.2)	41 mg/L	5 mg/L	ND	
COD (EPA 410.4)	90 mg/L	10 mg/L	ND	98
Conductivity (EPA 120.1)	550 umhs/cm			
TOC (EPA 415.1)	35 mg/L	1 mg/L	ND	

ND = None Detected

Reported By

QA Check

Greg Bolt
Laboratory Manager

Page 1 of 2

CHAIN OF CUSTODY RECORD

AMTEST

AmTest Inc.
Professional Analytical Services
9205 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

DATE: 11/27/95

Project Manager: Tim Todd
Company Name: Schnitzer Steel Industries, Inc.
Address: PO Box 10047
City, State, ZIP: Portland OR 97210
Phone: 503/286-6944
FAX: 503/286-6944

P.O. # or Project Number:
Project Name: 1200R
Project Location: 12005 N. Burgard, Portland

Lab Project Number:
Lab Location:
RUSH? YES (NO)

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE MATRIX	ANALYSIS REQUIRED
	2	H_2O	pH, Oil & Grease
	3		TSS, LOD
	4		Conductivity
	5		TOC, &
	6		metals (As, Cd,
	7		Cr, Pb, Hg,
	~~8~~ not sampled GS		Ni, Zn, & Cu)
	9		
	10		
	11		
	12		
	13		
	14		

LAB USE ONLY
Additional Analyses:
Requested By:
Date:

Relinquished By	Date/Time	Received By	Date/Time
Timothy R Todd	11/28/95 9:40	[illegible]	
Relinquished By	Date/Time	Received By	Date/Time
Relinquished By	Date/Time	Received By	Date/Time

Page 2 of 2

CHAIN OF CUSTODY RECORD

AMTEST

AmTest Inc.
Professional Analytical Services
9285 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

DATE: 11/27/95

Project Manager: Tim Todd
Company Name: Schnitzer Steel Industries Inc.
Address:
City, State, ZIP:
Phone: 503/286-6944
FAX: 503/286-6948

P.O. # or Project Number:
Project Name: 1200 R
Project Location: 12005 N. Burgard, Portland

Lab Project Number:
Lab Location:
RUSH? YES NO

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE MATRIX	ANALYSIS REQUIRED
	15	H_2O	See Page 1

LAB USE ONLY
Additional Analyses:
Requested By:
Date:

Relinquished By	Date/Time	Received By	Date/Time
Timothy R. Todd	11/27/95 940	[illegible]	
Relinquished By	Date/Time	Received By	Date/Time
Relinquished By	Date/Time	Received By	Date/Time

SCHNITZER STEEL PRODUCTS CO.

12005 N. Burgard St. Portland, Oregon 97203
P.O. Box 10047 Portland, Oregon 97210
Phone 503/286-5771 FAX 503/286-6948

SCRAP DIVISION
FAX TRANSMITTAL COVER SHEET

TO: Tom Zelenka DATE: 12/8

NUMBER OF PAGES BEING SENT

FROM: Tim Todd (INCLUDING COVER PAGE) 3

If message is incomplete or illegible, please call (503) 286-5771.

If you want to send a Fax to Schnitzer Steel, our Fax Number is (503) 286-6948.

RE: Draft EPA meeting notes for your consideration...

THE SCHNITZER GROUP

SCHN00245883

Page 1 of 2

CHAIN OF CUSTODY RECORD

AMTEST

AmTest Inc.
Professional Analytical Services
9205 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

DATE: 11/27/95

Project Manager: Tim Todd
Company Name: Schnitzer Steel Industries, Inc.
Address: PO Box 10047
City, State, ZIP: Portland OR 97210
Phone: 503/286-6944
FAX: 503/286-6944

P.O. # or Project Number:
Project Name: 1200R
Project Location: 12005 N. Burgard, Portland

Lab Project Number: 33204-16

Lab Location: R2-51, R2-52

RUSH? YES (NO)

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE MATRIX	ANALYSIS REQUIRED
33204	2	H_2O	pH, Oil & Grease
33205	3		TSS, COD
33206	4		Conductivity
33207	5		TOC, &
33208	6		Metals (As, Cd,
33209	7		Cr, Pb, Hg,
	~~8~~ not sampled (GS)		Ni, Zn, & Cu)
33210	9		
33211	10		
33212	11		
33213	12		
33214	13		
33215	14		

LAB USE ONLY

Additional Analyses:
Requested By:
Date:

Relinquished By	Date/Time	Received By	Date/Time
Timothy R. Todd	11/28/95 940	[illegible]	
Relinquished By	Date/Time	Received By	Date/Time
Relinquished By	Date/Time	Received By	Date/Time

CHAIN OF CUSTODY RECORD

AMTEST

AmTest Inc.
Professional Analytical Services
9205 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

DATE: 11/27/95

Project Manager: Tim Todd
Company Name: Schnitzer Steel Industries Inc.
Address:
City, State, ZIP:
Phone: 503/286-6944
FAX: 503/286-6948

P.O. # or Project Number:
Project Name: 1200 R
Project Location: 12005 N. Burgard, Portland

Lab Project Number: B3204-16
Lab Location: R2-21/R2-26
RUSH? YES NO

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE MATRIX	ANALYSIS REQUIRED
3216	15	H2O	See page 1

LAB USE ONLY
Additional Analyses:
Requested By:
Date:

Relinquished By	Date/Time	Received By	Date/Time
Timothy R. Todd	11/27/95 940	G. Bolt	
Relinquished By	Date/Time	Received By	Date/Time
Relinquished By	Date/Time	Received By	Date/Time

SCHNITZER STEEL PRODUCTS CO.

3200 N.W. Yeon Ave. P.O. Box 10047 Portland, Oregon 97210
Phone 503/224-9900 Telex/U.I.U. 36-0144 FAX 503/323-2793

cc: Terry G.
Keith L.

COPY

June 30, 1994

Mr. Charles Ashbaker
Department of Environmental Quality
Northwest Region
2020 S.W. 4th AVE.
4th Floor
Portland, OR 97201

Re: Annual Report of Storm Water Sampling Results
Permit No. 1200-R
File No. 108103

Dear Mr. Ashbaker:

I am transmitting a summary of the storm water sampling results collected during the last winter.

Sample Results

In accordance with the Storm Water Pollution Control Plan (SWPCP), samples were collected from each outfalls. The analytical laboratory results of sampling are presented in Tables 1 and 2 attached. The samplings were conducted on Dec. 14, 1994 for the last winter.

Evaluation of Results

The pH of the sample collected from outfall 11 was above the permit standard. The oil/grease concentrations in samples from outfall 5 and 16 exceeded permit standards. The remainder of the primary parameters do not have specific numerical permit limitations. Based upon the results of these sampling events, control measures and storm water management practices are being implemented to reduce the concentrations of monitored parameters.

Should you have any questions, please feel free to contact me at (503) 434-3324 at your convenience.

Sincerely,

Daniel Lee

Daniel Lee
Environmental Specialist

Attachments
cc: Peter Kramer, SSP

Table 1. Storm Water Sample Results						
Date Collected: Dec. 14, 1993						
Outfalls	pH	TSS	COD	TOC	Conduct	Petrol HC
1		No sample -- submerged outfall				
2	8.3	32	17	4	110	4
3	8.03	160	140	31	320	0
4	6.85	170	17	2	50	6
5	7.77	110	66	4	250	13
6	7.72	130	20	3	80	11
7	8.24	25	8	4	90	0
8		No discharge				
9	8.64	330	110	3	91	0
10		No discharge				
11	9.55	85	30	5	200	0
12	7.7	70	92	21	600	0
13		No discharge				
14	7.99	100	53	5	70	6
15	7.93	10	49	13	570	0
16	7.6	56	240	41	570	13
17	9.04	38	15	5	70	0
18	8.24	25	100	16	330	8
19		No sample -- submerged outfall				
20		No sample -- submerged outfall				
21		No sample -- submerged outfall				
22		No sample -- submerged outfall				
	Note:	TSS -- Total Suspended Solids				
		COD -- Chemical Oxygen Demand				
		TOC -- Total Organic Carbon				
		Conduct -- Conductivity (umhos/cm)				
		O & G -- Oil and Grease				
		Petrol HC -- Petrolium Hydrocarbons				
		Results expressed as mg/l (ppm) unless otherwise noted				

Table 2. Storm Water Sampling Results								
Date Collected: Dec. 14, 1993								
				0.018	0.082		0.120	
Outfalls	Arsenic	Cadmium	Chromium	Copper	Lead	Nickel	Zinc	Mercury
1		No sample -- submerged outfall						
2	0	0.004	0.01	0.06	0.11	0	0.7	0
3	0.005	0.01	0.053	0.025	0.42	0.05	2.3	0
4	0.007	0.002	0.014	0	0.06	0	0.16	0
5	0	0.004	0.025	0.08	0.14	0	0.49	0
6	0	0.001	0.01	0.06	0.06	0	0.11	0
7	0	0	0.006	0	0.01	0	0	0
8		No discharge						
9	0	0.03	0.048	0.15	0.68	0	0.81	0.0015
10		No discharge						
11	0	0	0.011	0	0.3	0	0.12	0
12	0	0.003	0.054	0.2	0.39	0	0.67	
13		No discharge						
14	0	0.002	0.04	0.1	0.26	0	0.48	0
15	0	0.001	0.012	0	0.02	0	0.1	0
16	0	0.004	0.019	0.07	0.08	0	0.21	0
17	0	0.001	0.026	0	0.09	0	0.28	0
18	0.005	0.003	0.059	0.16	0.31	0	0.52	0
19		No sample -- submerged outfall						
20		No sample -- submerged outfall						
21		No sample -- submerged outfall						
22		No sample -- submerged outfall						
	Note:	TSS -- Total Suspended Solids						
		COD -- Chemical Oxygen Demand						
		TOC -- Total Organic Carbon						
		Conduct -- Conductivity (umhos/cm)						
		O & G -- Oil and Grease						
		Petrol HC -- Petrolium Hydrocarbons						
		Results expressed as mg/l (ppm) unless otherwise noted						

Report Date: January 11, 1994
Job#: GE-931209BD-5
PO#: 18714
Project#: None Provided
Project: None Provided

Attention: Daniel Lee
Schnitzer Steel Industries,Inc
P.O. Box 10047
Portland, OR 97233

SAMPLE INFORMATION:
Date Samples Were Received By Laboratory: 12/09/93

Lab No.	Field Identification	Sample Matrix	Date	Time
1	Outfall #2	Surface Water	12-09-93	NP
2	Outfall #3	Surface Water	12-09-93	NP
3	Outfall #4	Surface Water	12-09-93	NP
4	Outfall #5	Surface Water	12-09-93	NP
5	Outfall #6	Surface Water	12-09-93	NP

ALYTICAL RESULTS ARE ON THE FOLLOWING PAGE(S).

Sincerely,

Susan M. Coffey
President

SMC/lws

This report is for the sole and exclusive use of the above-named client. Samples are retained 15 days from the report date, or until holding time expires. Results pertain only to samples submitted.

COFFEY LABORATORIES, INC.

SCHN00245906

Job#: GE-931209BD-5

Schnitzer Steel Industries,Inc

Sample Id		pH EPA 150.1	Total Suspended Solids EPA 160.2	Chemical Oxygen Demand EPA 410.4
1	Outfall #2	8.30	32	17
2	Outfall #3	8.03	160	140
3	Outfall #4	6.85	170	17
4	Outfall #5	7.77	110	66
5	Outfall #6	7.72	130	20
Detection Limits:		--	1	1
Units:		S.U.	mg/L	mg/L

Results expressed as mg/L unless otherwise noted.

Sample Id		Total Organic Carbon EPA 150.1	Conductivity EPA 120.1
1	Outfall #2	4	110
2	Outfall #3	31	320
3	Outfall #4	2	50
4	Outfall #5	4	250
5	Outfall #6	3	80
Detection Limits:		1	0.5
Units:		mg/L	µmhos/cm

ND means none detected at or above the detection limit listed.

Job#: GE-931209BD-5

Schnitzer Steel Industries,Inc

Sample Id		Arsenic EPA 206.2	Cadmium EPA 213.2	Chromium EPA 200.7
1	Outfall #2	ND	0.004	0.010
2	Outfall #3	0.005	0.010	0.053
3	Outfall #4	0.007	0.002	0.014
4	Outfall #5	ND	0.004	0.025
5	Outfall #6	ND	0.001	0.010
Detection Limits:		0.005	0.001	0.005

Sample Id		Copper EPA 200.7	Lead EPA 239.2	Mercury EPA 245.1
1	Outfall #2	0.06	0.11	ND
2	Outfall #3	0.25	0.42	ND,< 0.001
3	Outfall #4	ND	0.06	ND
4	Outfall #5	0.08	0.14	ND
5	Outfall #6	0.06	0.06	ND
Detection Limits:		0.05	0.01	0.0005

Sample Id		Nickel EPA 200.7	Zinc EPA 200.7
1	Outfall #2	ND	0.70
2	Outfall #3	0.05	2.3
3	Outfall #4	ND	0.16
4	Outfall #5	ND	0.49
5	Outfall #6	ND	0.11
Detection Limits:		0.05	0.05

Results expressed as mg/L unless otherwise noted.

ND means none detected at or above the detection limit listed.

The less than "<" symbol means none detected at or above the indicated value and represents the detection limit for the method.

Job#: GE-931209BD-5

Schnitzer Steel Industries,Inc

Analysis Performed: Polar and Non-Polar Oil & Grease in Water, Freon-Extractable, Gravimetric.

Sample Id		Oil & Grease SM 5520B	Polar Oil & Grease SM 5520B,F	Total Petoleum Hydrocarbons (Non-Polar) SM 5520F
1	Outfall #2	46	42	4
2	Outfall #3	ND	ND	ND
3	Outfall #4	250	244	6
4	Outfall #5	62	49	13
5	Outfall #6	43	32	11
Detection Limits:		10	3	3

Results expressed as mg/L unless otherwise noted.

SM means Standard Methods for the Examination of Water and Wastewater, 1989, 17th Edition.

ND means none detected at or above the detection limit listed.

Report Date: February 12, 1994
Job#: GE-940124Y-1
PO#: 19109
Project#: None Provided
Project: Storm Water Testing

Attention: Daniel Lee
Schnitzer Steel Industries, Inc
12005 N. Burgard Rd.
Portland, OR 97233

SAMPLE INFORMATION:
Date Samples Were Received By Laboratory: 01/24/94

Lab No.	Field Identification	Sample Matrix	Date	Time
1	Outfall #9	Surface Water	01-24-94	1000

ANALYTICAL RESULTS ARE ON THE FOLLOWING PAGE(S).

Sincerely,

Susan M. Coffey
President

SMC/lws

This report is for the sole and exclusive use of the above-named client. Samples are retained 15 days from the report date, or until holding time expires. Results pertain only to samples submitted.

Job#: GE-940124Y-1

Schnitzer Steel Industries,Inc
Page 2

Sample Id: 1 Outfall #9

Parameter	Method	Detection Limits	Sample Results
pH (S.U.)	EPA 150.1	--	8.64
Total Suspended Solids	EPA 160.2	1	330
Conductivity (µmhos/cm)	EPA 120.1	0.5	91
Chemical Oxygen Demand	EPA 410.4	1	110
Total Organic Carbon	EPA 415.1	1	3
Arsenic	EPA 206.2	0.005	ND
Cadmium	EPA 213.2	0.001	0.003
Chromium	EPA 218.2	0.002	0.048
Copper	*	0.05	0.15
Lead	EPA 239.2	0.02	0.68
Nickel	*	0.05	ND
Zinc	*	0.05	0.81
Mercury	EPA 245.1	0.0005	0.0015
Total Oil & Grease	SM 5520 B	3	3
Polar Oil & Grease	SM 5520 B,F	3	3
Total Petroleum Hydrocarbons (Non-Polar)	SM 5520 F	3	ND

Results expressed as mg/L unless otherwise noted.

* Federal Register, 40 CFR Part 136, Method 200.7, Friday, October 26, 1984, Part VIII.

SM means Standard Methods for the Examination of Water and Wastewater, 1989, 17th Edition.

COFFEY LABORATORIES, INC.
12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452

Report Date: January 13, 1994
Job#: GE-931214AM-7
PO#: 18747
Project#: None Provided
Project: None Provided

Attention: Daniel Lee
Schnitzer Steel Industries, Inc.
P.O. Box 10047
Portland, OR 97233

SAMPLE INFORMATION:
Date Samples Were Received By Laboratory: 12/14/93

Lab No.	Field Identification	Sample Matrix	Date	Time
1	Outfall #12	Surface Water	12-14-93	1000
2	Outfall #14	Surface Water	12-14-93	1030
3	Outfall #15	Surface Water	12-14-93	1100
4	Outfall #16	Surface Water	12-14-93	1130
5	Outfall #17	Surface Water	12-14-93	1200
6	Outfall #18	Surface Water	12-14-93	1330
7	Outfall #7	Surface Water	12-14-93	0930

ANALYTICAL RESULTS ARE ON THE FOLLOWING PAGES.

Sincerely,

Susan M. Coffey
President

SMC/daj

This report is for the sole and exclusive use of the above-named client. Samples are retained 15 days from the report date, or until holding time expires. Results pertain only to samples submitted.

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Schnitzer Steel Industries, Inc.

Job#: GE-931214AM-7
Page 2

Sample ID: #1 - Outfall #12
#2 - Outfall #14

Parameter	Method	Detection Limits	#1 Results (12)	#2 Results (14)
pH (S.U.)	EPA 150.1	---	7.70	7.99
Total Suspended Solids	EPA 160.2	1	70	100
Chemical Oxygen Demand	EPA 410.4	1	92	53
Total Organic Carbon	EPA 415.1	1	21	5
Conductivity (umhos/cm)	EPA 120.1	0.5	600	70
Total Oil & Grease	SM 5520-B	3	ND	10
Polar Oil & Grease	SM 5520-B,F	3	ND	4
Total Petroleum Hydrocarbons (Non-Polar)	SM 5520-F	3	ND	6
Arsenic	EPA 206.2	0.005	ND	ND
Cadmium	EPA 213.2	0.001	0.003	0.002
Chromium	*	0.005	0.054	0.040
Copper	*	0.05	0.20	0.10
Lead	EPA 239.2	0.01	0.39	0.26
Mercury	EPA 245.1	0.0005	0.0094	ND
Nickel	*	0.05	ND	ND
Zinc	*	0.05	0.67	0.48

Results expressed as mg/L unless otherwise noted.

SM means Standard Methods for the Examination of Water and Wastewater, 1985, 16th Edition.

* Federal Register, 40 CFR Part 136, Method 200.7, Friday, October 26, 1984, Part VIII.

ND means none detected at or above the detection limit listed.

Continues

Schnitzer Steel Industries, Inc.

Job#: GE-931214AM-7
Page 3

Sample ID: #3 - Outfall #15
#4 - Outfall #16

Parameter	Method	Detection Limits	#3 Results (15)	#4 Results (16)
pH (S.U.)	EPA 150.1	---	7.93	7.60
Total Suspended Solids	EPA 160.2	1	10	56
Chemical Oxygen Demand	EPA 410.4	1	49	240
Total Organic Carbon	EPA 415.1	1	13	41
Conductivity (umhos/cm)	EPA 120.1	0.5	570	570
Total Oil & Grease	SM 5520-B	3	4	21
Polar Oil & Grease	SM 5520-B,F	3	4	8
Total Petroleum Hydrocarbons (Non-Polar)	SM 5520-F	3	ND	13
Arsenic	EPA 206.2	0.005	ND	ND
Cadmium	EPA 213.2	0.001	0.001	0.004
Chromium	*	0.005	0.012	0.019
Copper	*	0.05	ND	0.07
Lead	EPA 239.2	0.01	0.02	0.08
Mercury	EPA 245.1	0.0005	ND	ND
Nickel	*	0.05	ND	ND
Zinc	*	0.05	0.10	0.21

Results expressed as mg/L unless otherwise noted.

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* Federal Register, 40 CFR Part 136, Method 200.7, Friday, October 26, 1984, Part VIII.

ND means none detected at or above the detection limit listed.

Continues

Schnitzer Steel Industries, Inc.

Job#: GE-931214AM-7
Page 4

Sample ID: #5 - Outfall #17
#6 - Outfall #18

Parameter	Method	Detection Limits	#5 Results (17)	#6 Results (18)
pH (S.U.)	EPA 150.1	---	9.04	8.24
Total Suspended Solids	EPA 160.2	1	38	25
Chemical Oxygen Demand	EPA 410.4	1	15	100
Total Organic Carbon	EPA 415.1	1	5	16
Conductivity (umhos/cm)	EPA 120.1	0.5	70	330
Total Oil & Grease	SM 5520-B	3	6	10
Polar Oil & Grease	SM 5520-B,F	3	6	2
Total Petroleum Hydrocarbons (Non-Polar)	SM 5520-F	3	ND	8
Arsenic	EPA 206.2	0.005	ND	0.005
Cadmium	EPA 213.2	0.001	0.001	0.003
Chromium	*	0.005	0.026	0.059
Copper	*	0.05	ND	0.16
Lead	EPA 239.2	0.01	0.09	0.31
Mercury	EPA 245.1	0.0005	ND	ND
Nickel	*	0.05	ND	ND
Zinc	*	0.05	0.28	0.52

Results expressed as mg/L unless otherwise noted.

SM means Standard Methods for the Examination of Water and Wastewater, 1985, 16th Edition.

* Federal Register, 40 CFR Part 136, Method 200.7, Friday, October 26, 1984, Part VIII.

ND means none detected at or above the detection limit listed.

Continues

Schnitzer Steel Industries, Inc.

Job#: GE-931214AM-7
Page 5

Sample ID: #7 - Outfall #7

Parameter	Method	Detection Limits	#7 Results
pH (S.U.)	EPA 150.1	---	8.24
Total Suspended Solids	EPA 160.2	1	25
Chemical Oxygen Demand	EPA 410.4	1	8
Total Organic Carbon	EPA 415.1	1	4
Conductivity (umhos/cm)	EPA 120.1	0.5	90
Total Oil & Grease	SM 5520-B	3	ND
Polar Oil & Grease	SM 5520-B,F	3	ND
Total Petroleum Hydrocarbons (Non-Polar)	SM 5520-F	3	ND
Arsenic	EPA 206.2	0.005	ND
Cadmium	EPA 213.2	0.001	ND
Chromium	*	0.005	0.006
Copper	*	0.05	ND
Lead	EPA 239.2	0.01	0.01
Mercury	EPA 245.1	0.0005	ND, <0.001
Nickel	*	0.05	ND
Zinc	*	0.05	ND

Results expressed as mg/L unless otherwise noted.

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* Federal Register, 40 CFR Part 136, Method 200.7, Friday, October 26, 1984, Part VIII.

ND means none detected at or above the detection limit listed.

The less than "<" symbol means none detected at or above the indicated value and represents the detection limit for the method.

Report Date: January 20, 1994
Job#: GE-940106AL-1
PO#: 18927
Project#: None Provided
Project: None Provided

Attention: Daniel Lee
Schnitzer Steel Industries, Inc.
P.O. Box 10047
Portland, OR 97233

SAMPLE INFORMATION:
Date Samples Were Received By Laboratory: 01/06/94

Lab No.	Field Identification	Sample Matrix	Date	Time
1	Outfall #11	Surface Water	01-06-94	1130

ANALYTICAL RESULTS ARE ON THE FOLLOWING PAGE(S).

Sincerely,

Susan M. Coffey
President

SMC/daj

This report is for the sole and exclusive use of the above-named client. Samples are retained 15 days from the report date, or until holding time expires. Results pertain only to samples submitted.

Schnitzer Steel Industries, Inc.

Job#: GE-940106AL-1
Page 2

Parameter	Method	Detection Limits	Outfall #11 Results
pH (S.U.)	EPA 150.1	---	9.55
Total Suspended Solids	EPA 160.2	1	85
Chemical Oxygen Demand	EPA 410.4	1	30
Total Organic Carbon	EPA 415.1	1	5
Conductivity (umhos/cm)	EPA 120.1	---	200
Arsenic	EPA 206.2	0.005	ND
Cadmium	EPA 213.2	0.001	ND
Chromium	EPA 218.2	0.001	0.011
Copper	*	0.05	ND
Lead	EPA 239.2	0.01	0.30
Mercury	EPA 245.1	0.0005	ND
Nickel	*	0.05	ND
Zinc	*	0.05	0.12
Total Oil & Grease	SM 5520-B	3	ND
Polar Oil & Grease	SM 5520-B,F	3	ND
Total Petroleum Hydrocarbons (Non-Polar)	SM 5520-F	3	ND

Results expressed as mg/L unless otherwise noted.

* Federal Register, 40 CFR Part 136, Method 200.7, Friday, October 26, 1984, Part VIII.

SM means Standard Methods for the Examination of Water and Wastewater, 1985, 16th Edition.

ND means none detected at or above the detection limit listed.

COFFEY LABORATORIES, INC.
12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452

Report Date: March 1, 1995
Job Number: 950221AI
PO Number: 22704
Project No: None Provided
Project Name: Feb. Outfall

Attention: Keith Lawson
Schnitzer Steel Industries,Inc
12005 N. Burgard Rd.
Portland, OR 97203

Analytical Narrative

The samples were received on 02/21/95 by Coffey Laboratories, Inc. (CLI) Sample Reception personnel under strict chain of custody protocol. The following information was provided at the time of sample reception:

Laboratory Sample ID	Field Identification	Matrix	Collection Date	Collection Time
950221AI-1	Sample #2	Storm Water	02/17/95	NP
950221AI-2	Sample #3	Storm Water	02/17/95	NP
950221AI-3	Sample #4	Storm Water	02/17/95	NP
950221AI-4	Sample #5	Storm Water	02/17/95	NP
950221AI-5	Sample #6	Storm Water	02/17/95	NP
950221AI-6	Sample #7	Storm Water	02/17/95	NP
950221AI-7	Sample #11	Storm Water	02/17/95	NP
950221AI-8	Sample #12	Storm Water	02/17/95	NP
950221AI-9	Sample #14	Storm Water	02/17/95	NP
950221AI-10	Sample #15	Storm Water	02/17/95	NP
950221AI-11	Sample #16	Storm Water	02/17/95	NP
950221AI-12	Sample #17	Storm Water	02/17/95	NP
950221AI-13	Sample #18	Storm Water	02/17/95	NP

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Job Number: 950221AI

Analytical Narrative (continued)

The recommended holding time for each batch of analyses was in accordance with the data quality objectives as specified in the CLI Quality Assurance Plan unless otherwise noted.

EPA 150.1: The samples were received at the laboratory and analyzed for pH four (4) days after the method holding time had expired.

Acceptable precision and accuracy were achieved for all analyses associated with this work order as demonstrated by the recoveries of the quality control samples analyzed concurrently with each batch.

The data submitted in this report is for the sole and exclusive use of the above-named client. All samples associated with the work order will be retained a maximum of 15 days from the report date or until the maximum holding time expires. All results pertain only to samples submitted.

Thank you for allowing Coffey Laboratories to be of service to you. If you have questions or need further assistance, please do not hesitate to call our Customer Services Department.

Sincerely,

Rona A. Klueh
Technical Director

RAK/atc

COFFEY LABORATORIES, INC.
12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452

Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 950221AI

Lab Sample ID: 950221AI-1
Field ID: Sample #2
Date/Time: 02/17/95
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	210	µmhos/cm
pH	EPA 150.1	—	7.32	S.U.
Total Suspended Solids	EPA 160.2	4.	32.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	37.	mg/L
Total Organic Carbon	EPA 415.1	1.	15.	mg/L
Total Oil & Grease	SM 5520BF	3.	ND	mg/L
Polar Oil & Grease	SM 5520BF	3.	ND	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	ND	mg/L

ND means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Chromium	CFR 200.7	0.005	0.009	mg/L
Copper	CFR 200.7	0.02	0.05	mg/L
Lead	CFR 200.7	0.05	0.08	mg/L
Nickel	CFR 200.7	0.01	ND	mg/L
Zinc	CFR 200.7	0.02	0.64	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	0.004	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L

ND means none detected at or above the detection limit listed.

COFFEY LABORATORIES, INC.
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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 950221AI

Lab Sample ID: 950221AI-2
Field ID: Sample #3
Date/Time: 02/17/95
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	430	µmhos/cm
pH	EPA 150.1	—	8.15	S.U.
Total Suspended Solids	EPA 160.2	10.	340	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	300	mg/L
Total Organic Carbon	EPA 415.1	1.	57.	mg/L
Total Oil & Grease	SM 5520BF	3.	19.	mg/L
Polar Oil & Grease	SM 5520BF	3.	9.	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	10	mg/L

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Cadmium	CFR 200.7	0.005	0.031	mg/L
Chromium	CFR 200.7	0.005	0.15	mg/L
Copper	CFR 200.7	0.02	0.55	mg/L
Lead	CFR 200.7	0.05	1.1	mg/L
Nickel	CFR 200.7	0.01	0.11	mg/L
Zinc	CFR 200.7	0.04	6.7	mg/L
Arsenic	EPA 206.2	0.005	0.013	mg/L
Mercury	EPA 245.1	0.0005	0.0029	mg/L

COFFEY LABORATORIES, INC.
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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 950221AI

Lab Sample ID: 950221AI-3
Field ID: Sample #4
Date/Time: 02/17/95
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	80.	µmhos/cm
pH	EPA 150.1	—	7.84	S.U.
Total Suspended Solids	EPA 160.2	10.	250	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	80.	mg/L
Total Organic Carbon	EPA 415.1	1.	3.	mg/L
Total Oil & Grease	SM 5520BF	3.	12.	mg/L
Polar Oil & Grease	SM 5520BF	3.	6.	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	6.	mg/L

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Chromium	CFR 200.7	0.005	0.043	mg/L
Copper	CFR 200.7	0.02	0.08	mg/L
Lead	CFR 200.7	0.05	0.18	mg/L
Nickel	CFR 200.7	0.01	0.02	mg/L
Zinc	CFR 200.7	0.02	0.43	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	0.002	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L

ND means none detected at or above the detection limit listed.

COFFEY LABORATORIES, INC.
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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 950221AI

Lab Sample ID: 950221AI-4
Field ID: Sample #5
Date/Time: 02/17/95
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	100	µmhos/cm
pH	EPA 150.1	—	9.80	S.U.
Total Suspended Solids	EPA 160.2	4.	28.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	8.	mg/L
Total Organic Carbon	EPA 415.1	1.	5.	mg/L
Total Oil & Grease	SM 5520BF	3.	ND	mg/L
Polar Oil & Grease	SM 5520BF	3.	ND	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	ND	mg/L

ND means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Chromium	CFR 200.7	0.005	ND	mg/L
Copper	CFR 200.7	0.02	ND	mg/L
Nickel	CFR 200.7	0.01	ND	mg/L
Zinc	CFR 200.7	0.02	0.03	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	ND	mg/L
Lead	EPA 239.2	0.001	0.005	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L

ND means none detected at or above the detection limit listed.

COFFEY LABORATORIES, INC.
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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 950221AI

Lab Sample ID: 950221AI-5
Field ID: Sample #6
Date/Time: 02/17/95
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	950	µmhos/cm
pH	EPA 150.1	—	7.61	S.U.
Total Suspended Solids	EPA 160.2	4.	140	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	140	mg/L
Total Organic Carbon	EPA 415.1	1.	3.	mg/L
Total Oil & Grease	SM 5520BF	3.	16.	mg/L
Polar Oil & Grease	SM 5520BF	3.	6.	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	11.	mg/L

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Chromium	CFR 200.7	0.005	0.056	mg/L
Copper	CFR 200.7	0.02	0.16	mg/L
Lead	CFR 200.7	0.05	0.33	mg/L
Nickel	CFR 200.7	0.01	0.06	mg/L
Zinc	CFR 200.7	0.02	1.2	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	0.004	mg/L
Mercury	EPA 245.1	0.0005	0.0016	mg/L

ND means none detected at or above the detection limit listed.

COFFEY LABORATORIES, INC.
12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452

Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 950221AI

Lab Sample ID: 950221AI-6
Field ID: Sample #7
Date/Time: 02/17/95
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	130	µmhos/cm
pH	EPA 150.1	----	8.77	S.U.
Total Suspended Solids	EPA 160.2	10.	80	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	ND	mg/L
Total Organic Carbon	EPA 415.1	1.	4.	mg/L
Total Oil & Grease	SM 5520BF	3.	7.	mg/L
Polar Oil & Grease	SM 5520BF	3.	4.	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	3.	mg/L

ND means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Chromium	CFR 200.7	0.005	0.010	mg/L
Copper	CFR 200.7	0.02	0.02	mg/L
Nickel	CFR 200.7	0.01	ND	mg/L
Zinc	CFR 200.7	0.02	0.09	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	ND	mg/L
Lead	EPA 239.2	0.003	0.064	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L

ND means none detected at or above the detection limit listed.

COFFEY LABORATORIES, INC.
12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452

Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 950221AI

Lab Sample ID: 950221AI-7
Field ID: Sample #11
Date/Time: 02/17/95
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	120	µmhos/cm
pH	EPA 150.1	—	8.86	S.U.
Total Suspended Solids	EPA 160.2	10.	180	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	6.	mg/L
Total Organic Carbon	EPA 415.1	1.	3.	mg/L
Total Oil & Grease	SM 5520BF	3.	ND	mg/L
Polar Oil & Grease	SM 5520BF	3.	ND	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	ND	mg/L

ND means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Chromium	CFR 200.7	0.005	0.010	mg/L
Copper	CFR 200.7	0.02	0.04	mg/L
Lead	CFR 200.7	0.05	0.08	mg/L
Nickel	CFR 200.7	0.01	ND	mg/L
Zinc	CFR 200.7	0.02	0.14	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	ND	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 950221AI

Lab Sample ID: 950221AI-8
Field ID: Sample #12
Date/Time: 02/17/95
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	520	µmhos/cm
pH	EPA 150.1	—	7.73	S.U.
Total Suspended Solids	EPA 160.2	10.	140	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	96.	mg/L
Total Organic Carbon	EPA 415.1	1.	9.	mg/L
Total Oil & Grease	SM 5520BF	3.	10	mg/L
Polar Oil & Grease	SM 5520BF	3.	7.	mg/L
otal Petroleum Hydrocarbons	SM 5520BF	3.	3.	mg/L

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Chromium	CFR 200.7	0.005	0.084	mg/L
Copper	CFR 200.7	0.02	0.35	mg/L
Lead	CFR 200.7	0.05	0.78	mg/L
Nickel	CFR 200.7	0.01	0.05	mg/L
Zinc	CFR 200.7	0.02	1.1	mg/L
Arsenic	EPA 206.2	0.005	0.012	mg/L
Cadmium	EPA 213.2	0.001	0.004	mg/L
Mercury	EPA 245.1	0.0005	0.0025	mg/L

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 950221AI

Lab Sample ID: 950221AI-9
Field ID: Sample #14
Date/Time: 02/17/95
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	620	µmhos/cm
pH	EPA 150.1	—	[redacted]	S.U.
Total Suspended Solids	EPA 160.2	4.	40.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	74.	mg/L
Total Organic Carbon	EPA 415.1	1.	14.	mg/L
Total Oil & Grease	SM 5520BF	3.	8.	mg/L
Polar Oil & Grease	SM 5520BF	3.	4.	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	4.	mg/L

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Chromium	CFR 200.7	0.005	0.039	mg/L
Copper	CFR 200.7	0.02	0.11	mg/L
Lead	CFR 200.7	0.05	0.21	mg/L
Nickel	CFR 200.7	0.01	0.02	mg/L
Zinc	CFR 200.7	0.02	0.52	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	0.002	mg/L
Mercury	EPA 245.1	0.0005	0.0010	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 950221AI

Lab Sample ID: 950221AI-10
Field ID: Sample #15
Date/Time: 02/17/95
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	380	µmhos/cm
pH	EPA 150.1	—	7.74	S.U.
Total Suspended Solids	EPA 160.2	1.	22.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	34.	mg/L
Total Organic Carbon	EPA 415.1	1.	10.	mg/L
Total Oil & Grease	SM 5520BF	3.	11.	mg/L
Polar Oil & Grease	SM 5520BF	3.	4.	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	7.	mg/L

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Chromium	CFR 200.7	0.005	0.012	mg/L
Copper	CFR 200.7	0.02	0.07	mg/L
Lead	CFR 200.7	0.05	0.09	mg/L
Nickel	CFR 200.7	0.01	0.02	mg/L
Zinc	CFR 200.7	0.02	0.20	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	ND	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 950221AI

Lab Sample ID: 950221AI-11
Field ID: Sample #16
Date/Time: 02/17/95
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	200	µmhos/cm
pH	EPA 150.1	—	7.53	S.U.
Total Suspended Solids	EPA 160.2	1.	6.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	41.	mg/L
Total Organic Carbon	EPA 415.1	1.	11.	mg/L
Total Oil & Grease	SM 5520BF	3.	8.	mg/L
Polar Oil & Grease	SM 5520BF	3.	4.	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	4.	mg/L

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Chromium	CFR 200.7	0.005	ND	mg/L
Copper	CFR 200.7	0.02	ND	mg/L
Nickel	CFR 200.7	0.01	0.03	mg/L
Zinc	CFR 200.7	0.02	0.06	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	0.003	mg/L
Lead	EPA 239.2	0.001	0.017	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 950221AI

Lab Sample ID: 950221AI-12
Field ID: Sample #17
Date/Time: 02/17/95
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	190	µmhos/cm
pH	EPA 150.1	—	7.62	S.U.
Total Suspended Solids	EPA 160.2	2.	8.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	8.	mg/L
Total Organic Carbon	EPA 415.1	1.	ND	mg/L
Total Oil & Grease	SM 5520BF	3.	ND	mg/L
Polar Oil & Grease	SM 5520BF	3.	ND	mg/L
otal Petroleum Hydrocarbons	SM 5520BF	3.	ND	mg/L

ND means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Chromium	CFR 200.7	0.005	0.017	mg/L
Copper	CFR 200.7	0.02	ND	mg/L
Nickel	CFR 200.7	0.01	ND	mg/L
Zinc	CFR 200.7	0.02	0.09	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	ND	mg/L
Lead	EPA 239.2	0.001	0.002	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 950221AI

Lab Sample ID: 950221AI-13
Field ID: Sample #18
Date/Time: 02/17/95
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	1800	µmhos/cm
pH	EPA 150.1	—	7.64	S.U.
Total Suspended Solids	EPA 160.2	2.	36.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	550	mg/L
Total Organic Carbon	EPA 415.1	1.	210	mg/L
Total Oil & Grease	SM 5520BF	3.	15.	mg/L
Polar Oil & Grease	SM 5520BF	3.	ND	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	13.	mg/L

ND means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Chromium	CFR 200.7	0.005	0.010	mg/L
Copper	CFR 200.7	0.02	0.23	mg/L
Lead	CFR 200.7	0.05	0.07	mg/L
Nickel	CFR 200.7	0.01	0.04	mg/L
Zinc	CFR 200.7	0.02	0.27	mg/L
Arsenic	EPA 206.2	0.005	0.009	mg/L
Cadmium	EPA 213.2	0.001	0.001	mg/L
Mercury	EPA 245.1	0.0005	0.0013	mg/L

COFFEY LABORATORIES, INC.
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Report Date: December 29, 1994
Job Number: 941215CI
PO Number: 22113
Project No: None Provided
Project Name: Dec. 94 Storm Water

Attention: Daniel Lee
Schnitzer Steel Industries,Inc
P.O. Box 10047
Portland, OR 97233

Analytical Narrative

The samples were received on 12/15/94 by Coffey Laboratories, Inc. (CLI) Sample Reception personnel under strict chain of custody protocol. The following information was provided at the time of sample reception:

Laboratory Sample ID	Field Identification	Matrix	Collection Date	Collection Time
941215CI-1	Outfall #2	Storm Water	12/14/94	1300
941215CI-2	Outfall #5	Storm Water	12/14/94	1315
941215CI-3	Outfall #10	Storm Water	12/14/94	1330
941215CI-4	Outfall #15	Storm Water	12/14/94	1400
941215CI-5	Outfall #16	Storm Water	12/14/94	1415
941215CI-6	Outfall #17	Storm Water	12/14/94	1430
941215CI-7	Outfall #18	Storm Water	12/14/94	1445

The recommended holding time for each batch of analyses was in accordance with the data quality objectives as specified in the CLI Quality Assurance Plan unless otherwise noted.

Acceptable precision and accuracy were achieved for all analyses associated with this work order as demonstrated by the recoveries of the quality control samples analyzed concurrently with each batch.

The data submitted in this report is for the sole and exclusive use of the above-named client. All samples associated with the work order will be retained a maximum of 15 days from the report date or until the maximum holding time expires. All results pertain only to samples submitted.

Thank you for allowing Coffey Laboratories to be of service to you. If you have questions or need further assistance, please do not hesitate to call our Customer Services Department.

Sincerely,

Susan M. Coffey
President

SMC/atc

COFFEY LABORATORIES, INC.
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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941215CI

Lab Sample ID: 941215CI-1
Field ID: Outfall #2
Date/Time: 12/14/94 1300
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	220	µmhos/cm
pH	EPA 150.1	—	8.43	S.U.
Total Suspended Solids	EPA 160.2	1.	530	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	290	mg/L
Total Organic Carbon	EPA 415.1	1.	9.	mg/L
Total Petroleum Hydrocarbons	EPA 418.1	5.	20	mg/L

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Arsenic	EPA 206.2	0.005	ND	mg/L
Mercury	EPA 245.1	0.001	0.002	mg/L
Cadmium	EPA 6010	0.005	0.026	mg/L
Chromium	EPA 6010	0.005	0.082	mg/L
Copper	EPA 6010	0.02	0.34	mg/L
Lead	EPA 6010	0.05	0.74	mg/L
Nickel	EPA 6010	0.01	0.08	mg/L
Zinc	EPA 6010	0.02	5.9	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941215CI

Lab Sample ID: 941215CI-2
Field ID: Outfall #5
Date/Time: 12/14/94 1315
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	190	µmhos/cm
pH	EPA 150.1	—	7.46	S.U.
Total Suspended Solids	EPA 160.2	1.	280	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	200	mg/L
Total Organic Carbon	EPA 415.1	1.	8.	mg/L
Total Petroleum Hydrocarbons	EPA 418.1	5.	8.	mg/L

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Arsenic	EPA 206.2	0.005	ND	mg/L
Mercury	EPA 245.1	0.001	ND	mg/L
Cadmium	EPA 6010	0.005	0.006	mg/L
Chromium	EPA 6010	0.005	0.048	mg/L
Copper	EPA 6010	0.02	0.12	mg/L
Lead	EPA 6010	0.05	0.30	mg/L
Nickel	EPA 6010	0.01	0.05	mg/L
Zinc	EPA 6010	0.02	0.74	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941215CI

Lab Sample ID: 941215CI-3
Field ID: Outfall #10
Date/Time: 12/14/94 1330
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	120	µmhos/cm
pH	EPA 150.1	—	7.75	S.U.
Total Suspended Solids	EPA 160.2	1.	10.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	6.	mg/L
Total Organic Carbon	EPA 415.1	1.	1.	mg/L
Total Petroleum Hydrocarbons	EPA 418.1	1.	ND	mg/L

ND means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Arsenic	EPA 206.2	0.005	ND	mg/L
Lead	EPA 239.2	0.001	0.005	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L
Cadmium	EPA 6010	0.005	ND	mg/L
Chromium	EPA 6010	0.005	ND	mg/L
Copper	EPA 6010	0.02	ND	mg/L
Nickel	EPA 6010	0.01	ND	mg/L
Zinc	EPA 6010	0.02	0.05	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941215CI

Lab Sample ID: 941215CI-4
Field ID: Outfall #15
Date/Time: 12/14/94 1400
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	910	µmhos/cm
pH	EPA 150.1	----	7.79	S.U.
Total Suspended Solids	EPA 160.2	1.	13.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	49.	mg/L
Total Organic Carbon	EPA 415.1	1.	7.	mg/L
Total Petroleum Hydrocarbons	EPA 418.1	1.	ND	mg/L

ND means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Arsenic	EPA 206.2	0.005	ND	mg/L
Lead	EPA 239.2	0.001	0.007	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L
Cadmium	EPA 6010	0.005	ND	mg/L
Chromium	EPA 6010	0.005	0.006	mg/L
Copper	EPA 6010	0.02	0.04	mg/L
Nickel	EPA 6010	0.01	0.06	mg/L
Zinc	EPA 6010	0.02	0.15	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941215CI

Lab Sample ID: 941215CI-5
Field ID: Outfall #16
Date/Time: 12/14/94 1415
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	260	µmhos/cm
pH	EPA 150.1	—	7.30	S.U.
Total Suspended Solids	EPA 160.2	1.	12.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	34.	mg/L
Total Organic Carbon	EPA 415.1	1.	7.	mg/L
Total Petroleum Hydrocarbons	EPA 418.1	1.	2.	mg/L

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Arsenic	EPA 206.2	0.005	ND	mg/L
Lead	EPA 239.2	0.001	0.022	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L
Cadmium	EPA 6010	0.005	ND	mg/L
Chromium	EPA 6010	0.005	0.006	mg/L
Copper	EPA 6010	0.02	0.03	mg/L
Nickel	EPA 6010	0.01	0.10	mg/L
Zinc	EPA 6010	0.02	0.15	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941215CI

Lab Sample ID: 941215CI-6
Field ID: Outfall #17
Date/Time: 12/14/94 1430
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	110	µmhos/cm
pH	EPA 150.1	---	8.52	S.U.
Total Suspended Solids	EPA 160.2	1.	180	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	230	mg/L
Total Organic Carbon	EPA 415.1	1.	2.	mg/L
Total Petroleum Hydrocarbons	EPA 418.1	2.	6.	mg/L

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Arsenic	EPA 206.2	0.005	0.006	mg/L
Mercury	EPA 245.1	0.001	ND	mg/L
Cadmium	EPA 6010	0.005	0.006	mg/L
Chromium	EPA 6010	0.005	0.095	mg/L
Copper	EPA 6010	0.02	0.28	mg/L
Lead	EPA 6010	0.05	0.55	mg/L
Nickel	EPA 6010	0.01	0.03	mg/L
Zinc	EPA 6010	0.02	0.77	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941215CI

Lab Sample ID: 941215CI-7
Field ID: Outfall #18
Date/Time: 12/14/94 1445
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	1600	µmhos/cm
pH	EPA 150.1	—	7.28	S.U.
Total Suspended Solids	EPA 160.2	1.	180	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	1000	mg/L
Total Organic Carbon	EPA 415.1	1.	350	mg/L
Total Petroleum Hydrocarbons	EPA 418.1	2.	9.	mg/L

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Arsenic	EPA 206.2	0.005	0.013	mg/L
Mercury	EPA 245.1	0.001	0.004	mg/L
Cadmium	EPA 6010	0.005	0.011	mg/L
Chromium	EPA 6010	0.01	0.05	mg/L
Copper	EPA 6010	0.02	0.66	mg/L
Lead	EPA 6010	0.05	0.55	mg/L
Nickel	EPA 6010	0.01	0.08	mg/L
Zinc	EPA 6010	0.02	1.2	mg/L

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Report Da... November 9, 1994
Job Number: 941028F
PO Number: 21625
Project No: None Provided
Project Name: Oct 94 Stormwater

Attention: Keith Lawson
Schnitzer Steel Industries,Inc
P.O. Box 10047
Portland, OR 97233

Analytical Narrative

The samples were received on 10/28/94 by Coffey Laboratories, Inc. (CLI) Sample Reception personnel under strict chain of custody protocol. The following information was provided at the time of sample reception:

Laboratory Sample ID	Field Identification	Matrix	Collection Date	Collection Time
941028F-1	Sample #3	Storm Water	[redacted]	1:30
941028F-2	Sample #4	Storm Water	10/27/94	1:30
941028F-3	Sample #6	Storm Water	10/27/94	1:30
941028F-4	Sample #7	Storm Water	10/27/94	1:30
941028F-5	Sample #11	Storm Water	10/27/94	1:30
941028F-6	Sample #12	Storm Water	10/27/94	1:30
941028F-7	Sample #14	Storm Water	10/27/94	1:30

The recommended holding time for each batch of analyses was in accordance with the data quality objectives as specified in the CLI Quality Assurance Plan unless otherwise noted.

EPA 150.1: The samples were received at the laboratory and analyzed for pH one (1) day after the method holding time had expired.

Acceptable precision and accuracy were achieved for all analyses associated with this work order as demonstrated by the recoveries of the quality control samples analyzed concurrently with each batch.

The data submitted in this report is for the sole and exclusive use of the above-named client. All samples associated with the work order will be retained a maximum of 15 days from the report date or until the maximum holding time expires. All results pertain only to samples submitted.

Thank you for allowing Coffey Laboratories to be of service to you. If you have questions or need further assistance, please do not hesitate to call our Customer Services Department.

Sincerely,

Rona Klueh

Rona A. Klueh
Technical Director

RAK/atc

COFFEY LABORATORIES, INC.
12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452

Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941028F

Lab Sample ID: 941028F-7
Field ID: Sample #14
Date/Time: 10/27/94 1:30
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	73.	µmhos/cm
pH	EPA 150.1	---	7.76	S.U.
Total Suspended Solids	EPA 160.2	1.	81.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	49.	mg/L
Total Organic Carbon	EPA 415.1	1.	3.	mg/L
Total Oil & Grease	SM 5520BF	3.	11.	mg/L
Polar Oil & Grease	SM 5520BF	3.	8.	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	4.	mg/L

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Copper	CFR 200.7	0.02	0.11	mg/L
Nickel	CFR 200.7	0.01	0.01	mg/L
Zinc	CFR 200.7	0.02	0.39	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	0.002	mg/L
Chromium	EPA 218.2	0.001	0.036	mg/L
Lead	EPA 239.2	0.005	0.19	mg/L
Mercury	EPA 245.1	0.0005	0.0006	mg/L

ND means none detected at or above the detection limit listed.

COFFEY LABORATORIES, INC.
12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452

Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941028F

Lab Sample ID: 941028F-6
Field ID: Sample #12
Date/Time: 10/27/94 1:30
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	570	µmhos/cm
pH	EPA 150.1	----	7.32	S.U.
Total Suspended Solids	EPA 160.2	1.	65.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	120	mg/L
Total Organic Carbon	EPA 415.1	1.	27.	mg/L
Total Oil & Grease	SM 5520BF	3.	7.	mg/L
Polar Oil & Grease	SM 5520BF	3.	5.	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	ND	mg/L

ND means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Copper	CFR 200.7	0.02	0.19	mg/L
Lead	CFR 200.7	0.05	0.32	mg/L
Nickel	CFR 200.7	0.01	0.02	mg/L
Zinc	CFR 200.7	0.02	0.60	mg/L
Arsenic	EPA 206.2	0.005	0.006	mg/L
Cadmium	EPA 213.2	0.001	0.003	mg/L
Chromium	EPA 218.2	0.002	0.054	mg/L
Mercury	EPA 245.1	0.0005	0.0016	mg/L

COFFEY LABORATORIES, INC.
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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941028F

Lab Sample ID: 941028F-5
Field ID: Sample #11
Date/Time: 10/27/94 1:30
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	530	µmhos/cm
pH	EPA 150.1	----	7.66	S.U.
Total Suspended Solids	EPA 160.2	1.	76.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	44.	mg/L
Total Organic Carbon	EPA 415.1	1.	9.	mg/L
Total Oil & Grease	SM 5520BF	3.	5.	mg/L
Polar Oil & Grease	SM 5520BF	3.	4.	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	ND	mg/L

D means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Copper	CFR 200.7	0.02	0.05	mg/L
Nickel	CFR 200.7	0.01	ND	mg/L
Zinc	CFR 200.7	0.02	0.13	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	ND	mg/L
Chromium	EPA 218.2	0.001	0.014	mg/L
Lead	EPA 239.2	0.002	0.056	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941028F

Lab Sample ID: 941028F-4
Field ID: Sample #7
Date/Time: 10/27/94 1:30
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	96.	µmhos/cm
pH	EPA 150.1	---	9.71	S.U.
Total Suspended Solids	EPA 160.2	1.	32.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	22.	mg/L
Total Organic Carbon	EPA 415.1	1.	2.	mg/L
Total Oil & Grease	SM 5520BF	3.	ND	mg/L
Polar Oil & Grease	SM 5520BF	3.	ND	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	ND	mg/L

D means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Copper	CFR 200.7	0.02	0.04	mg/L
Nickel	CFR 200.7	0.01	ND	mg/L
Zinc	CFR 200.7	0.02	0.05	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	ND	mg/L
Chromium	EPA 218.2	0.001	0.010	mg/L
Lead	EPA 239.2	0.001	0.017	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941028F

Lab Sample ID: 941028F-3
Field ID: Sample #6
Date/Time: 10/27/94 1:30
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	140	µmhos/cm
pH	EPA 150.1	----	8.88	S.U.
Total Suspended Solids	EPA 160.2	1.	54.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	29.	mg/L
Total Organic Carbon	EPA 415.1	1.	4.	mg/L
Total Oil & Grease	SM 5520BF	3.	8.	mg/L
Polar Oil & Grease	SM 5520BF	3.	ND	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	5.	mg/L

ND means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Copper	CFR 200.7	0.02	0.03	mg/L
Nickel	CFR 200.7	0.01	ND	mg/L
Zinc	CFR 200.7	0.02	0.06	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	ND	mg/L
Chromium	EPA 218.2	0.001	0.013	mg/L
Lead	EPA 239.2	0.001	0.031	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941028F

Lab Sample ID: 941028F-2
Field ID: Sample #4
Date/Time: 10/27/94 1:30
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	83.	µmhos/cm
pH	EPA 150.1	—	7.74	S.U.
Total Suspended Solids	EPA 160.2	1.	30.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	22.	mg/L
Total Organic Carbon	EPA 415.1	1.	6.	mg/L
Total Oil & Grease	SM 5520BF	3.	ND	mg/L
Polar Oil & Grease	SM 5520BF	3.	ND	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	ND	mg/L

ND means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Copper	CFR 200.7	0.02	0.13	mg/L
Nickel	CFR 200.7	0.01	ND	mg/L
Zinc	CFR 200.7	0.02	0.13	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	ND	mg/L
Chromium	EPA 218.2	0.005	0.080	mg/L
Lead	EPA 239.2	0.001	0.033	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L

ND means none detected at or above the detection limit listed.

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Analytical Data

Schnitzer Steel Industries,Inc

Job Number: 941028F

Lab Sample ID: 941028F-1
Field ID: Sample #3
Date/Time: 10/27/94 1:30
Matrix: Storm Water

EPA Category: Conventional Parameters

Parameter	Method	Detection Limit	Analytical Result	Units
Conductivity	EPA 120.1	0.5	44.	µmhos/cm
pH	EPA 150.1	—	7.52	S.U.
Total Suspended Solids	EPA 160.2	1.	8.	mg/L
Chemical Oxygen Demand	EPA 410.4	1.	22.	mg/L
Total Organic Carbon	EPA 415.1	1.	6.	mg/L
Total Oil & Grease	SM 5520BF	3.	6.	mg/L
Polar Oil & Grease	SM 5520BF	3.	ND	mg/L
Total Petroleum Hydrocarbons	SM 5520BF	3.	4.	mg/L

D means none detected at or above the detection limit listed.

EPA Category: Metals

Parameter	Method	Detection Limit	Analytical Result	Units
Copper	CFR 200.7	0.02	0.04	mg/L
Nickel	CFR 200.7	0.01	ND	mg/L
Zinc	CFR 200.7	0.02	0.16	mg/L
Arsenic	EPA 206.2	0.005	ND	mg/L
Cadmium	EPA 213.2	0.001	ND	mg/L
Chromium	EPA 218.2	0.001	0.004	mg/L
Lead	EPA 239.2	0.001	0.025	mg/L
Mercury	EPA 245.1	0.0005	ND	mg/L

ND means none detected at or above the detection limit listed.

COFFEY LABORATORIES, INC.
12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452

Report Date: November 9, 1994
Job Number: 941028F
PO Number: 21625
Project No: None Provided
Project Name: Oct 94 Stormwater

Attention: Keith Lawson
Schnitzer Steel Industries,Inc
P.O. Box 10047
Portland, OR 97233

Analytical Narrative

The samples were received on 10/28/94 by Coffey Laboratories, Inc. (CLI) Sample Reception personnel under strict chain of custody protocol. The following information was provided at the time of sample reception:

Laboratory Sample ID	Field Identification	Matrix	Collection Date	Collection Time
941028F-1	Sample #3	Storm Water	10/27/94	1:30
941028F-2	Sample #4	Storm Water	10/27/94	1:30
941028F-3	Sample #6	Storm Water	10/27/94	1:30
941028F-4	Sample #7	Storm Water	10/27/94	1:30
941028F-5	Sample #11	Storm Water	10/27/94	1:30
941028F-6	Sample #12	Storm Water	10/27/94	1:30
941028F-7	Sample #14	Storm Water	10/27/94	1:30

The recommended holding time for each batch of analyses was in accordance with the data quality objectives as specified in the CLI Quality Assurance Plan unless otherwise noted.

EPA 150.1: The samples were received at the laboratory and analyzed for pH one (1) day after the method holding time had expired.

Acceptable precision and accuracy were achieved for all analyses associated with this work order as demonstrated by the recoveries of the quality control samples analyzed concurrently with each batch.

The data submitted in this report is for the sole and exclusive use of the above-named client. All samples associated with the work order will be retained a maximum of 15 days from the report date or until the maximum holding time expires. All results pertain only to samples submitted.

Thank you for allowing Coffey Laboratories to be of service to you. If you have questions or need further assistance, please do not hesitate to call our Customer Services Department.

Sincerely,

Rona A. Klueh
Technical Director

RAK/atc

COFFEY LABORATORIES, INC.
12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452

NET NATIONAL ENVIRONMENTAL TESTING, INC.

Portland Division
17400 SW Upper Boones Ferry Rd.
Suite #250
Portland, OR 97224
Tel: (503) 624-5448
Fax: (503) 639-6889

Kevin Freeman
Spencer Environmental
Services, Inc.
15770 Beaver Glen Drive
Oregon City, OR 97045

Date: 01/13/1994
NET Account No.: 24410
NET Job Number: 94.00013

Project: Schnitzer Steel Maintenance
Location:

Sample analysis in support of the project referenced above has been completed and results are presented on the following pages. Should you have questions regarding procedures or results, please feel welcome to contact Client Services.

Sample Number		Sample Description	Matrix Type	Date Taken	Date Received
20969	1LB		SLUDGE	01/05/1994	01/05/1994

Approved by:

Marty French
NET, INC. Division Manager

ANALYTICAL REPORT

John Simpson
Spencer Environmental
P.O. Box 5207
914 S. Molalla Avenue
Oregon City, OR 97045

02/23/1996
Job No.: 96.00409

Page: 2

Project Name: Schnitzer Steel
Date Received: 02/19/1996

Sample Number	Sample Description
59976	D31SST-1

PARAMETERS	METHODS	RESULTS	REPORT LIMIT	UNITS	DATE ANALYZED	FLAG
ICP/AA Digestion - Water	ICP	-			02/22/1996	
TCLP EXTRACTION PREP	1311	-			02/23/1996	
TCLP - Arsenic, ICP	6010	ND	0.05	mg/L	02/22/1996	
TCLP - Barium, ICP	6010	0.960	0.05	mg/L	02/22/1996	
TCLP - Cadmium, ICP	6010	ND	0.05	mg/L	02/22/1996	
TCLP - Chromium, ICP	6010	ND	0.05	mg/L	02/22/1996	
TCLP - Lead, ICP	6010	ND	0.05	mg/L	02/22/1996	
TCLP - Mercury	7470	ND	0.0002	mg/L	02/22/1996	
TCLP - Selenium, ICP	6010	ND	0.05	mg/L	02/22/1996	
TCLP - Silver, ICP	6010	ND	0.05	mg/L	02/22/1996	
8240 VOLATILES (S)						
Acetone	8240	3.7	2.	mg/Kg	02/21/1996	
Benzene	8240	ND	0.5	mg/Kg	02/21/1996	
Bromodichloromethane	8240	ND	0.5	mg/Kg	02/21/1996	
Bromoform	8240	ND	0.5	mg/Kg	02/21/1996	
Bromomethane	8240	ND	0.5	mg/Kg	02/21/1996	
2-Butanone	8240	ND	2.	mg/Kg	02/21/1996	
Carbon Disulfide	8240	ND	0.5	mg/Kg	02/21/1996	
Carbon Tetrachloride	8240	ND	0.5	mg/Kg	02/21/1996	
Chlorobenzene	8240	ND	0.5	mg/Kg	02/21/1996	
Chloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
2-Chloroethylvinyl ether	8240	ND	2.	mg/Kg	02/21/1996	
Chloroform	8240	ND	0.5	mg/Kg	02/21/1996	
Chloromethane	8240	ND	0.5	mg/Kg	02/21/1996	
Dibromochloromethane	8240	ND	0.5	mg/Kg	02/21/1996	
1,4-Dichlorobenzene	8240	ND	0.5	mg/Kg	02/21/1996	
1,2-Dichlorobenzene	8240	ND	0.5	mg/Kg	02/21/1996	
1,3-Dichlorobenzene	8240	ND	0.5	mg/Kg	02/21/1996	
1,1-Dichloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
1,2-Dichloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
1,1-Dichloroethene	8240	ND	0.5	mg/Kg	02/21/1996	
cis-1,2-Dichloroethene	8240	ND	0.5	mg/Kg	02/21/1996	

A sample result of ND indicates the parameter was Not Detected at the reporting limit.

ANALYTICAL REPORT

John Simpson
Spencer Environmental
P.O. Box 5207
914 S. Molalla Avenue
Oregon City, OR 97045

02/23/1996
Job No.: 96.00409

Page: 3

Project Name: Schnitzer Steel
Date Received: 02/19/1996

Sample Number	Sample Description
59976	0216ST-1

PARAMETERS	METHODS	RESULTS	REPORT LIMIT	UNITS	DATE ANALYZED	FLAG
trans-1,2-Dichloroethene	8240	ND	0.5	mg/Kg	02/21/1996	
1,3-Dichloropropane	8240	ND	0.5	mg/Kg	02/21/1996	
cis-1,3-Dichloropropene	8240	ND	0.5	mg/Kg	02/21/1996	
trans-1,3-Dichloropropene	8240	ND	0.5	mg/Kg	02/21/1996	
Ethylbenzene	8240	ND	0.5	mg/Kg	02/21/1996	
2-Hexanone	8240	ND	0.5	mg/Kg	02/21/1996	
Methylene Chloride	8240	ND	5.	mg/Kg	02/21/1996	
4-Methyl-2-Pentanone	8240	ND	0.5	mg/Kg	02/21/1996	
Styrene	8240	ND	0.5	mg/Kg	02/21/1996	
1,1,2,2-Tetrachloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
Tetrachloroethene	8240	1.5	0.5	mg/Kg	02/21/1996	
Toluene	8240	0.47	0.5	mg/Kg	02/21/1996	J
1,1,1-Trichloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
1,1,2-Trichloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
Trichloroethene	8240	ND	0.5	mg/Kg	02/21/1996	
Trichlorofluoromethane	8240	ND	0.5	mg/Kg	02/21/1996	
Vinyl Acetate	8240	ND	0.5	mg/Kg	02/21/1996	
Vinyl Chloride	8240	ND	1.	mg/Kg	02/21/1996	
m,p-xylene	8240	ND	0.5	mg/Kg	02/21/1996	
o-xylene	8240	ND	0.5	mg/Kg	02/21/1996	

Sample Number	Sample Description
59977	0216ST-2

PARAMETERS	METHODS	RESULTS	REPORT LIMIT	UNITS	DATE ANALYZED	FLAG
Flashpoint	1010	>140	140	Degree	02/21/1996	
8240 VOLATILES (S)						
Acetone	8240	19.2	2.	mg/Kg	02/21/1996	
Benzene	8240	ND	0.5	mg/Kg	02/21/1996	
Bromodichloromethane	8240	ND	0.5	mg/Kg	02/21/1996	
Bromoform	8240	ND	0.5	mg/Kg	02/21/1996	
Bromomethane	8240	ND	0.5	mg/Kg	02/21/1996	

A sample result of ND indicates the parameter was Not Detected at the reporting limit.

ANALYTICAL REPORT

John Simpson
Spencer Environmental
P.O. Box 5207
914 S. Molalla Avenue
Oregon City, OR 97045

02/23/1996
Job No.: 96.00409

Page: 4

Project Name: Schnitzer Steel
Date Received: 02/19/1996

Sample Number	Sample Description
59977	021697-2

PARAMETERS	METHODS	RESULTS	REPORT LIMIT	UNITS	DATE ANALYZED	FLAG
2-Butanone	8240	3.7	2.	mg/Kg	02/21/1996	
Carbon Disulfide	8240	ND	0.5	mg/Kg	02/21/1996	
Carbon Tetrachloride	8240	ND	0.5	mg/Kg	02/21/1996	
Chlorobenzene	8240	ND	0.5	mg/Kg	02/21/1996	
Chloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
2-Chloroethylvinyl ether	8240	ND	2.	mg/Kg	02/21/1996	
Chloroform	8240	ND	0.5	mg/Kg	02/21/1996	
Chloromethane	8240	ND	0.5	mg/Kg	02/21/1996	
Dibromochloromethane	8240	ND	0.5	mg/Kg	02/21/1996	
1,4-Dichlorobenzene	8240	ND	0.5	mg/kg	02/21/1996	
1,2-Dichlorobenzene	8240	ND	0.5	mg/Kg	02/21/1996	
1,3-Dichlorobenzene	8240	ND	0.5	mg/Kg	02/21/1996	
1,1-Dichloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
1,2-Dichloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
1,1-Dichloroethene	8240	ND	0.5	mg/Kg	02/21/1996	
cis-1,2-Dichloroethene	8240	ND	0.5	mg/Kg	02/21/1996	
trans-1,2-Dichloroethene	8240	ND	0.5	mg/Kg	02/21/1996	
1,2-Dichloropropane	8240	ND	0.5	mg/Kg	02/21/1996	
cis-1,3-Dichloropropene	8240	ND	0.5	mg/Kg	02/21/1996	
trans-1,3-Dichloropropene	8240	ND	0.5	mg/Kg	02/21/1996	
Ethylbenzene	8240	3.0	0.5	mg/Kg	02/21/1996	
2-Hexanone	8240	ND	0.5	mg/Kg	02/21/1996	
Methylene Chloride	8240	ND	5.	mg/Kg	02/21/1996	
4-Methyl-2-Pentanone	8240	ND	0.5	mg/Kg	02/21/1996	
Styrene	8240	ND	0.5	mg/Kg	02/21/1996	
1,1,2,2-Tetrachloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
Tetrachloroethene	8240	ND	0.5	mg/Kg	02/21/1996	
Toluene	8240	0.41	0.5	mg/Kg	02/21/1996	J
1,1,1-Trichloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
1,1,2-Trichloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
Trichloroethene	8240	ND	0.5	mg/Kg	02/21/1996	
Trichlorofluoromethane	8240	ND	0.5	mg/Kg	02/21/1996	

A sample result of ND indicates the parameter was Not Detected at the reporting limit.

ANALYTICAL REPORT

John Simpson
Spencer Environmental
P.O. Box 5207
914 S. Molalla Avenue
Oregon City, OR 97045

02/23/1996
Job No.: 96.00409

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Project Name: Schnitzer Steel
Date Received: 02/19/1996

Sample Number	Sample Description
59977	0216ST-2

PARAMETERS	METHODS	RESULTS	REPORT LIMIT	UNITS	DATE ANALYZED	FLAG
Vinyl Acetate	8240	ND	0.5	mg/Kg	02/21/1996	
Vinyl Chloride	8240	ND	1.	mg/Kg	02/21/1996	
m,p-xylene	8240	16.8	0.5	mg/Kg	02/21/1996	
o-xylene	8240	6.6	0.5	mg/Kg	02/21/1996	

Sample Number	Sample Description
59978	0216ST-3

PARAMETERS	METHODS	RESULTS	REPORT LIMIT	UNITS	DATE ANALYZED	FLAG
ICP/AA Digestion - Water	ICP	-			02/22/1996	
TCLP EXTRACTION PREP	1311	-			02/23/1996	
TCLP - Arsenic, ICP	6010	ND	0.05	mg/L	02/22/1996	
TCLP - Barium, ICP	6010	2.3	0.05	mg/L	02/22/1996	
TCLP - Cadmium, ICP	6010	ND	0.05	mg/L	02/22/1996	
TCLP - Chromium, ICP	6010	ND	0.05	mg/L	02/22/1996	
TCLP - Lead, ICP	6010	0.150	0.05	mg/L	02/22/1996	
TCLP - Mercury	7470	ND	0.0002	mg/L	02/22/1996	
TCLP - Selenium, ICP	6010	ND	0.05	mg/L	02/22/1996	
TCLP - Silver, ICP	6010	ND	0.05	mg/L	02/22/1996	
8240 VOLATILES (S)						
Acetone	8240	ND	2.	mg/Kg	02/21/1996	
Benzene	8240	ND	0.5	mg/Kg	02/21/1996	
Bromodichloromethane	8240	ND	0.5	mg/Kg	02/21/1996	
Bromoform	8240	ND	0.5	mg/Kg	02/21/1996	
Bromomethane	8240	ND	0.5	mg/Kg	02/21/1996	
2-Butanone	8240	ND	2.	mg/Kg	02/21/1996	
Carbon Disulfide	8240	ND	0.5	mg/Kg	02/21/1996	
Carbon Tetrachloride	8240	ND	0.5	mg/Kg	02/21/1996	
Chlorobenzene	8240	ND	0.5	mg/Kg	02/21/1996	
Chloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
2-Chloroethylvinyl ether	8240	ND	2.	mg/Kg	02/21/1996	
Chloroform	8240	ND	0.5	mg/Kg	02/21/1996	

A sample result of ND indicates the parameter was Not Detected at the reporting limit.

ANALYTICAL REPORT

John Simpson
Spencer Environmental
P.O. Box 5207
914 S. Molalla Avenue
Oregon City, OR 97045

02/23/1996
Job No.: 96.00409

Page: 6

Project Name: Schnitzer Steel
Date Received: 02/19/1996

Sample Number	Sample Description
58978	021668T-3

PARAMETERS	METHODS	RESULTS	REPORT LIMIT	UNITS	DATE ANALYZED	FLAG
Chloromethane	8240	ND	0.5	mg/Kg	02/21/1996	
Dibromochloromethane	8240	ND	0.5	mg/Kg	02/21/1996	
1,4-Dichlorobenzene	8240	ND	0.5	mg/Kg	02/21/1996	
1,2-Dichlorobenzene	8240	ND	0.5	mg/Kg	02/21/1996	
1,3-Dichlorobenzene	8240	ND	0.5	mg/Kg	02/21/1996	
1,1-Dichloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
1,2-Dichloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
1,1-Dichloroethene	8240	ND	0.5	mg/Kg	02/21/1996	
cis-1,2-Dichloroethene	8240	ND	0.5	mg/Kg	02/21/1996	
trans-1,2-Dichloroethene	8240	ND	0.5	mg/Kg	02/21/1996	
1,2-Dichloropropane	8240	ND	0.5	mg/Kg	02/21/1996	
cis-1,3-Dichloropropene	8240	ND	0.5	mg/Kg	02/21/1996	
trans-1,3-Dichloropropene	8240	ND	0.5	mg/Kg	02/21/1996	
Ethylbenzene	8240	2.7	0.5	mg/Kg	02/21/1996	
2-Hexanone	8240	ND	0.5	mg/Kg	02/21/1996	
Methylene Chloride	8240	ND	5.	mg/Kg	02/21/1996	
4-Methyl-2-Pentanone	8240	ND	0.5	mg/Kg	02/21/1996	
Styrene	8240	ND	0.5	mg/Kg	02/21/1996	
1,1,2,2-Tetrachloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
Tetrachloroethene	8240	ND	0.5	mg/Kg	02/21/1996	
Toluene	8240	1.8	0.5	mg/Kg	02/21/1996	
1,1,1-Trichloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
1,1,2-Trichloroethane	8240	ND	0.5	mg/Kg	02/21/1996	
Trichloroethene	8240	ND	0.5	mg/Kg	02/21/1996	
Trichlorofluoromethane	8240	ND	0.5	mg/Kg	02/21/1996	
Vinyl Acetate	8240	ND	0.5	mg/Kg	02/21/1996	
Vinyl Chloride	8240	ND	1.	mg/Kg	02/21/1996	
m,p-Xylene	8240	11.3	0.5	mg/Kg	02/21/1996	
o-Xylene	8240	6.4	0.5	mg/Kg	02/21/1996	

A sample result of ND indicates the parameter was Not Detected at the reporting limit.

NET®

QUALITY CONTROL REPORT
MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Spencer Environmental
Services, Inc.
15770 Beaver Glen Drive
Oregon City, OR 97045

Date: 01/13/1994

NET Job Number: 94.00013

Contact: Kevin Freeman
Project: Schnitzer Steel Maintenance

Analyte	Matrix Spike Result	Sample Result	Spike Amount	Units	Percent Recovery	MSD Result	MSD Spike Amount	Units	Percent Recovery	MS/MSD RPD
TCLP - Arsenic, ICP	1.94	ND	2.0	mg/L	97.0	1.98	2.0	mg/L	99.0	2.0
TCLP - Barium, ICP	3.16	1.28	2.00	mg/L	94.0	3.21	2.00	mg/L	96.5	2.6
TCLP - Cadmium, ICP	2.01	ND	2.00	mg/L	100.5	2.07	2.00	mg/L	103.5	2.9
TCLP - Chromium, ICP	1.97	ND	2.00	mg/L	98.5	2.02	2.00	mg/L	101.0	2.4
TCLP - Lead, ICP	1.97	ND	2.00	mg/L	98.5	1.83	2.00	mg/L	91.5	7.4
TCLP - Mercury	0.00055	ND	0.0005	mg/L	110.4	0.0005	0.0005	mg/L	115.0	6.1
TCLP - Selenium, ICP	2.08	ND	2.00	mg/L	104.0	2.06	2.00	mg/L	103.0	1.0
TCLP - Silver, ICP	1.02	ND	1.00	mg/L	102.0	1.04	1.00	mg/L	104.0	1.9
8240 VOLATILES (S)										
Benzene	236	ND	240	mg/Kg	97.5	222	221	mg/Kg	100.5	2.9
Chlorobenzene	233	ND	240	mg/Kg	97.1	229	221	mg/Kg	103.6	6.4
1,1-Dichloroethene	225	ND	240	mg/Kg	93.8	213	221	mg/Kg	96.4	2.7
Toluene	227	ND	240	mg/Kg	94.6	223	221	mg/Kg	100.9	6.3
Trichloroethene	221	ND	240	mg/Kg	92.1	213	221	mg/Kg	96.4	4.6

NOTE: Matrix Spike Samples may not be samples from this job.

MS = Matrix Spike
MSD = Matrix Spike Duplicate
RPD = Relative Percent Difference
dil.= Diluted Out

NET®

QUALITY CONTROL REPORT
BLANKS

Spencer Environmental
Services, Inc.
15770 Beaver Glen Drive
Oregon City, OR 97045

Date: 01/13/1994

NET Job Number: 94.00013

Contact: Kevin Freeman
Project: Schnitzer Steel Maintenance
Location:

Analyte	Blank Analysis	MDL	Units	Date Analyzed
TCLP - Arsenic, ICP	ND	0.5	mg/L	01/11/1994
TCLP - Barium, ICP	ND	1.0	mg/L	01/11/1994
TCLP - Cadmium, ICP	ND	0.1	mg/L	01/11/1994
TCLP - Chromium, ICP	ND	0.5	mg/L	01/11/1994
TCLP - Lead, ICP	ND	1.0	mg/L	01/11/1994
TCLP - Mercury	ND	0.0002	mg/L	01/07/1994
TCLP - Selenium, ICP	ND	0.7	mg/L	01/11/1994
TCLP - Silver, ICP	ND	0.1	mg/L	01/11/1994
8240 VOLATILES (S)				
Acetone	ND	0.02	mg/Kg	01/07/1994
Benzene	ND	0.005	mg/Kg	01/07/1994
Bromodichloromethane	ND	0.005	mg/Kg	01/07/1994
Bromoform	ND	0.005	mg/Kg	01/07/1994
Bromomethane	ND	0.005	mg/Kg	01/07/1994
2-Butanone	ND	0.02	mg/Kg	01/07/1994
Carbon Disulfide	ND	0.005	mg/Kg	01/07/1994
Carbon Tetrachloride	ND	0.005	mg/Kg	01/07/1994
Chlorobenzene	ND	0.005	mg/Kg	01/07/1994
Chloroethane	ND	0.005	mg/Kg	01/07/1994
2-Chloroethylvinyl ether	ND	0.02	mg/Kg	01/07/1994
Chloroform	ND	0.005	mg/Kg	01/07/1994
Chloromethane	ND	0.005	mg/Kg	01/07/1994
Dibromochloromethane	ND	0.005	mg/Kg	01/07/1994
1,2-Dichlorobenzene	ND	0.005	mg/Kg	01/07/1994
1,3-Dichlorobenzene	ND	0.005	mg/Kg	01/07/1994
1,1-Dichloroethane	ND	0.005	mg/Kg	01/07/1994

Advisory Control Limits for Blanks:
Metals/Wet Chemistry/ Conventionals/GC - all compounds should be less than the Reporting Limit.
GC/MS - Semi-Volatiles - all compounds should be less than the Reporting Limit except for phthalates which should be less than 5 times the reporting limit.

NET

QUALITY CONTROL REPORT
BLANKS

Spencer Environmental
Services, Inc.
15770 Beaver Glen Drive
Oregon City, OR 97045

Date: 01/13/1994

NET Job Number: 94.00013

Contact: Kevin Freeman
Project: Schnitzer Steel Maintenance
Location:

Analyte	Blank Analysis	MDL	Units	Date Analyzed
1,2-Dichloroethane	ND	0.005	mg/Kg	01/07/1994
1,1-Dichloroethene	ND	0.005	mg/Kg	01/07/1994
1,2-Dichloroethene (total)	ND	0.005	mg/Kg	01/07/1994
1,2-Dichloropropane	ND	0.005	mg/Kg	01/07/1994
cis-1,3-Dichloropropene	ND	0.005	mg/Kg	01/07/1994
trans-1,3-Dichloropropene	ND	0.005	mg/Kg	01/07/1994
Ethylbenzene	ND	0.005	mg/Kg	01/07/1994
2-Hexanone	ND	0.02	mg/Kg	01/07/1994
Methylene Chloride	ND	0.05	mg/Kg	01/07/1994
4-Methyl-2-Pentanone	ND	0.02	mg/Kg	01/07/1994
Styrene	ND	0.005	mg/Kg	01/07/1994
1,1,2,2-Tetrachloroethane	ND	0.005	mg/Kg	01/07/1994
Tetrachloroethene	ND	0.005	mg/Kg	01/07/1994
Toluene	ND	0.005	mg/Kg	01/07/1994
1,1,1-Trichloroethane	ND	0.005	mg/Kg	01/07/1994
1,1,2-Trichloroethane	ND	0.005	mg/Kg	01/07/1994
Trichloroethene	ND	0.005	mg/Kg	01/07/1994
Trichlorofluoromethane	ND	0.005	mg/Kg	01/07/1994
Vinyl Acetate	ND	0.02	mg/Kg	01/07/1994
Vinyl Chloride	ND	0.005	mg/Kg	01/07/1994
Xylenes, total	ND	0.005	mg/Kg	01/07/1994
1,2-Dichloroethane-d4 (surr.)	97	-	%	01/07/1994
Toluene-d8 (Surr.)	97	-	%	01/07/1994
Bromofluorobenzene (Surr.)	94	-	%	01/07/1994

Advisory Control Limits for Blanks:
Metals/Wet Chemistry/ Conventionals/GC - all compounds should be less than the Reporting Limit.
GC/MS - Semi-Volatiles - all compounds should be less than the Reporting Limit except for phthalates which should be less than 5 times the reporting limit.

Spencer Inc.
P.O. Box 5207
914 S. Molalla Ave.
Oregon City, OR 97045

Phone (503) 655-0996
Fax (503) 657-3395

CHAIN OF CUSTODY RECORD

CUSTOMER [illegible]
PROJECT MANAGER [illegible]
COLLECTED BY [illegible]

PROJECT NAME
PROJECT NUMBER
P.O. NUMBER

LAB PROJECT NUMBER
5 DAY TURN AROUND ☑ YES ☐ NO
RUSH ☐ YES ☑ NO

COMMENTS

SAMPLES RECEIVED AT 4°C ☐ YES ☐ NO
SAMPLES IN APPROPRIATE CONTAINERS ☐ YES ☐ NO

PROVIDE VERBAL RESULTS ☐ YES ☑ NO
PROVIDE PRELIMINARY FAX RESULTS ☑ YES ☐ NO
PROVIDE FINAL FAX RESULTS ☑ YES ☐ NO

ANALYSES TO BE PERFORMED

LAB NO.	SPENCER SAMPLE I.D.	DATE	TIME	SAMPLE DESCRIPTION	MATRIX: SOIL	MATRIX: WATER	MATRIX: OTHER	NUMBER OF CONTAINERS	Sample For Lab Analysis	Sample For Sample By Spencer	TPH-HCID GAS/DEG	TPH-Gasoline GAS/DEG	TPH-Diesel GAS/DEG	TPH-418.1 Modified GAS/DEG	HCID-Fuel Scan GC/FID	TPH 418.1	BTEX 8020/8020	Halogenated Volatiles 8010/8010	Volatiles 8240/8260	Semivolatiles 8270/8270	PCB's 8080/8080	pH	TCLP (6) Metals	TCLP (8) Metals	% Water	BTUs	[illegible]		REMARKS
1	0216ST-1	2/16/96	3:00pm	OIL/SLUDGE			X	1	1										X				X						[illegible]
2	0216ST-2	↓	3:00pm	UNKNOWN LIQUID			X	4	1										X								X		[illegible]
3	0216ST-3	↓	3:45pm	SLUDGE/WATER			X	1	1										X				X						[illegible]
																													[illegible]

RELINQUISHED BY	COMPANY	DATE/TIME	RECEIVED BY	COMPANY
[illegible]	SUMMITTER STEEL	2/16/96 [illegible]	[illegible]	SPENCER ENVIRO
[illegible]	SPENCER ENVIRO	2/16/96 5:30pm	[illegible]	[illegible]

JAN 09 '97 04:00PM SPENCER ENVIRO, P.8

SCHN00245960

AMTEST

AmTest Inc.

Professional
Analytical
Services

9205 SW Nimbus Ave.
Beaverton, OR
97008

Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

C
L Tim Todd
I Schnitzer Steel Products, Inc.
E P.O. Box 10047
N Portland OR 97210
T

Date Received: 10/20/95
Date Analyzed: 11/1/95
Date Reported: 11/2/95
Job Number: 29311
Page: 1

Project - Stormwater

file in reference files (may be a file already)

Sample Type - Water

Lab Number	Client Identification
29311	SW1

Analysis	Results	Detection Limit	Blank
pH (EPA 150.1)	7.1		
Oil & Grease (EPA 413.2)	14 mg/L (ppm)	3.0 mg/L	ND
TSS (EPA 160.2)	130 mg/L (ppm)	5 mg/L	ND
COD (EPA 410.4)	1700 mg/L (ppm)	50 mg/L	ND
Conductivity (EPA 120)	2100 umhos/cm		
TOC (EPA 415.1)	500 mg/L (ppm)	1 mg/L	ND

ND = None Detected

Reported By Hugh Healey

QA Check DB

Hugh Healey for
Greg Bolt
Laboratory Manager

SCHN00245961

AMTEST

AmTest Inc.
Professional Analytical Services
9205 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

CLIENT
Tim Todd
Schnitzer Steel Products, Inc.
P.O. Box 10047
Portland OR 97210

Date Received: 10/20/95
Date Analyzed: 11/1/95
Date Reported: 11/2/95
Job Number: 29311
Page: 2

Analysis - Metals (EPA 7000 Series)
Sample Type - Water

Project - Stormwater

	Results		Quality Control Information	
Lab Sample Number	29311	Detection	Digestion	Blank
Client Identification	SW1	Limit	Blank	Spike
Metal	mg/L (ppm)	mg/L (ppm)	mg/L (ppm)	% Recovery
Arsenic	ND	0.01	ND	104
Cadmium	0.016	0.002	ND	93
Chromium	0.08	0.01	ND	113
Lead	0.75	0.01	ND	102
Mercury	ND	0.001	ND	
Nickel	0.13	0.01	ND	

ND = None Detected

Hugh Healey
Reported By

GB
QA Check

Greg Bolt
Greg Bolt
Laboratory Manager

SCHN00245962

CHAIN OF CUSTODY RECORD

AMTEST

AmTest Inc.
Professional Analytical Services
9205 SW Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

DATE:

Project Manager: Tim Todd
Company Name:
Address:
City, State, ZIP:
Phone:
FAX:

P.O. # or Project Number:
Project Name:
Project Location:

Lab Project Number: 29341
Lab Location: R233
RUSH? YES NO

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE MATRIX	ANALYSIS REQUIRED
29341	SW1	H2O	Conductivity
			(EPA 120.1),
			pH, TSS (EPA
			160.2) COD
			(EPA 410.4),
			Total Oil & Grease
			(SM 5520BF)
			& Cr, Cd, Pb,
			Ni, As, Cd,
			& Hg (7000
			Series)
			TOC

LAB USE ONLY

Additional Analyses:
Requested By:
Date:

Relinquished By	Date/Time	Received By	Date/Time
Timothy R. Todd	10/20/95 0800	Heath Healey	10/20/95 13:00
Relinquished By	Date/Time	Received By	Date/Time
Relinquished By	Date/Time	Received By	Date/Time

Columbia Analytical Services INC.
An Employee-Owned Company

CHAIN OF CUSTODY

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

SR#: _____

PAGE 1 OF 1 COC # _____

PROJECT NAME: SSP - IT
PROJECT NUMBER:
PROJECT MANAGER: Jim Jakubiak
COMPANY/ADDRESS: P.O. Box 10047, Portland, OR 97296-0047
PHONE #: (503) 286-6976 FAX #: (503) 286-6948
SAMPLER'S SIGNATURE: [signature]

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics by GC/MS 625☐ 8270☐	Volatile Organics 624☐ 8260☐	Pesticide / Herbicides 608☐ 8021☐ BTEX☐	Total Toxic Organics (TTO) 608☐ 8081☐ 8141☐ 8151☐	PCB AROCLORs 8082 608☐ 624☐ 625☐	NWTPH - HCID☐ NWTPH-D☐ NWTPH-G☐	Hydrocarbon Scan☐ O & G☐	Chlorophenolics - 8151M Tri☐ Tetra☐ PCP☐	PAHs 8310☐ SIM☐	GC/MS-SIM PAH☐ Phenol☐ Phthalates☐	Metals, Total or Dissolved (see list below)	Cyanide☐ Hex-Chrom☐	pH Cond. Cl-, SO4, PO4, F, NO2, NO3, BOD (TSS) TDS (circle)	NH3-N, COD, Total-P, TKN, TOC, DOC (circle)	TOC 9020☐ AOX 1650☐ 506☐					REMARKS
#2	11/11/99	1510		Water	3							X					X		X						
#3	11/11/99	1500		Water	3							X					X		X						
#4	11/11/99	1450		Water	3							X					X		X						
#5	11/11/99	1520		Water	3							X					X		X						
#6	11/11/99	1515		Water	3							X					X		X						
#7	11/11/99	1545		Water	3							X					X		X						
#14	11/11/99	1615		Water	3							X					X		X						
#20	11/11/99	1600		Water	3							X					X		X						

REPORT REQUIREMENTS

X I. Routine Report: Method Blank, Surrogate, as required
___ II. Report Dup., MS, MSD as required
___ III. Data Validation Report (includes all raw data)
___ IV. CLP Deliverable Report
___ V. EDD

INVOICE INFORMATION

P.O. # SSP-IT
Bill To: Jim Jakubiak
P.O. Box 10047
Portland, OR 97296

TURNAROUND REQUIREMENTS

___ 24 hr. ___ 48 hr.
___ 5 Day
X Standard (10-15 working days)
___ Provide FAX Results

Requested Report Date

Circle which metals are to be analyzed:

Total Metals: Al As Sb Ba Be B Ca Cd Co Cr (Cu) Fe (Pb) Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V (Zn) Hg

Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

SPECIAL INSTRUCTIONS/COMMENTS:
Total Copper EPA 6010B
Total Lead EPA 7421
Total Zinc EPA 6010B
pH EPA 150.1
TSS EPA 160.2
O&G EPA 413.1

RELINQUISHED BY:	RECEIVED BY:	RELINQUISHED BY:	RECEIVED BY:
Signature: [signature] Date/Time: 11/12/99 11:15am	Signature: Date/Time:	Signature: Date/Time:	Signature: Date/Time:
Printed Name: Jim Jakubiak Firm: SST	Printed Name: Firm:	Printed Name: Firm:	Printed Name: Firm:

SCHN00245968

Columbia Analytical Services, Inc. General Terms and Conditions

Laboratory Services

1. These Terms and Conditions embody the whole agreement of the parties in the absence of a signed and executed contract between the Laboratory ("LAB") and Client. They shall supersede all previous communications, representations, or agreements, either verbal or written, between the parties. The LAB specifically rejects all additional, inconsistent or conflicting terms, whether printed or otherwise set forth in any purchase order or other communication from the Client to LAB. The invalidity or unenforceability, in whole or in part of any provision, term or condition hereof shall not affect in any way the validity or enforceability of the remainder of the Terms and Conditions. No waiver by LAB of any provision, term or condition hereof or of any breach by or obligation of the Client hereunder shall constitute a waiver of such provision, term or condition on any other occasion or a waiver of any other breach by or obligation of the Client. This agreement shall be administered and interpreted under the laws of the state from which services are procured.

2. **Warranty.** Recognizing that the nature of many samples is unknown and that some may contain potentially hazardous components, LAB warrants only that it will perform testing services, obtain findings and prepare reports in accordance with generally accepted analytical laboratory principles and practices at the time of performance of services. LAB makes no other warranty, express or implied.

At LAB sole discretion, preliminary results may be given in advance of the laboratory report. Such preliminary results are tentative, subject to confirmation and final review by LAB. Client's use of preliminary results in any manner shall be at Client's sole risk.

3. **Scope and Compensation.** LAB agrees to perform the services described in the proposal or agreement to which these Terms and Conditions are attached. Unless the parties agree in writing to the contrary, the duties of LAB shall not be construed to exceed the services specifically described.

Payment terms are net 30 days from the date of invoice. All overdue payments are subject to an interest charge of one and one-half percent (1 1/2%) per month or a portion thereof. Client shall also be responsible for costs of collection, including payment of reasonable attorney fees if such expense is incurred. The prices, unless stated, do not include any sales, use or other taxes. Such taxes will be added to invoice prices when required. LAB reserves the right to require payment prior to release of data. Until such time as Client invoices are paid in full, LAB has no obligation, and will not defend, reproduce, return, or supplement data results.

4. **Prices.** Compensation for services performed will be based on the current Lab Analytical Fee Schedule, or on verbal quotations agreed to in writing by the parties. Unless specifically indicated on the written confirmation of quotation, analytical turnaround times are not guaranteed. The minimum charge will be $100.00 unless otherwise noted.

5. **Methods.** Where applicable, LAB will use analytical methodologies which are in substantial conformity with U.S. Environmental Protection Agency (EPA), State Agency, American Society for Testing and Materials (ASTM), Association of Official Analytical Chemists (AOAC), Standard Methods for the Examination of Water and Wastewater, or other recognized methodologies. LAB reserves the right to deviate from these methodologies, if necessary or appropriate, due to the nature or composition of the sample or otherwise, based on the reasonable judgment of LAB. Deviations, if any, will be made on a basis consistent with recognized standards of the industry and/or LAB's standard operating procedures.

6. **Limitations of Liability.** In the event of any error, omission or other professional negligence, the sole and exclusive responsibility of LAB shall be to reperform the deficient work at its own expense, and LAB shall have no other liability whatsoever. All claims shall be deemed waived unless made in writing and received by LAB within ninety (90) days following completion of services.

LAB shall have no liability, obligation or responsibility of any kind for losses, costs, expenses or other damages (including but not limited to any special, indirect, incidental or consequential damages) with respect to LAB's services or results.

All results provided by LAB are strictly for the use of its clients, and LAB is in no way responsible for the use of such results by clients or third parties. All results should be considered in their entirety, and LAB is not responsible for the separation, detachment, or other use of any portion of the results.

7. **Hazard Disclosure.** Client represents and warrants that any sample delivered to LAB will be preceded or accompanied by complete written disclosure of the presence of hazardous substances known or suspected by Client. Client further warrants that any sample containing any hazardous substance which is to be delivered to LAB will be packaged, labeled, transported and delivered properly and in accordance with applicable laws.

8. **Sample Handling.** Prior to LAB's acceptance of any sample (or after any revocation of acceptance), the entire risk of loss of or damage to such sample remains with Client. Samples are accepted when receipt is acknowledged on chain of custody documentation. In no event will LAB have any responsibility or liability for the action or inaction of any carrier shipping or delivering any sample to or from LAB's premises.

LAB will use its best efforts to arrange for the shipment of specially prepared sample bottles, sampling instructions per Client instruction by the readily available, least cost method. Any other shipment arrangements will be at Client's expense.

Disposal of hazardous waste samples is the responsibility of the Client. If the Client does not wish such samples returned, LAB may add storage and disposal fees to the final invoice. Maximum storage time for samples is 30 days after completion of analysis, unless modified by applicable state or federal laws. Client will be required to give to LAB written instructions concerning disposal of these samples.

LAB reserves the absolute right, exercisable at any time, to refuse to receive delivery of, refuse to accept, or revoke acceptance of any sample which, in the sole judgment of LAB, (a) is of unsuitable volume, (b) may be or become unsuitable for, or may pose a risk in handling, transport or processing for any health, safety, environmental or other reason, whether or not due to the presence in the sample of any hazardous substance, and whether or not such presence has been disclosed to LAB by Client or (c) has been delivered to the LAB more than 72 hours after sampling or if one half or more of the recommended holding time for the analysis has lapsed.

9. **Legal Responsibility.** LAB is solely responsible for performance of this contract, and no affiliated company, director, officer, employee, or agent shall have any legal responsibility hereunder, whether in contract or tort, including negligence.

10. **Data Deliverables.** Where specifically requested by Client, LAB agrees to produce electronic data representing services performed hereunder, subject to the following specific understanding between the parties: LAB agrees to supply Client with electronic data as mutually defined, using an agreed medium. Client recognizes that LAB is not a software consultant, manufacturer or reseller; any transfer of electronic data pursuant to services provided by LAB is an accommodation to and strictly for the convenience of the client who is solely liable for the choice and maintenance of the medium utilized. Electronic data provided under this agreement is not deemed to be the project deliverable for the purpose of fulfilling obligations under the Agreement. The provision of electronic data does not in any way modify the intention of the parties that the Client rely on the written or hard copy form of the deliverable.

Except with regard to any limited warranty as specifically set forth below, LAB disclaims and excludes all warranties express or implied with regard to the creation, transmittal or use of electronic data hereunder. The limited warranty in this Agreement replaces all other warranties, express or implied, including any warranties of merchantability or fitness for a particular purpose. Professional warranties extend to written or hard copy deliverables only and do <u>not</u> extend to electronic data supplied to Client. Professional warranties in the Agreement which extend to written or hard copy deliverables shall be undisturbed by this Amendment. LAB's liability for medium failure shall be limited to replacement of the electronic data with a hard copy for a period of thirty days from the date of delivery. LAB's electronic data transfer is derived in part from or is created using third party software, and no such third party warrants or assumes any liability regarding use of or undertakes to provide support information relating to LAB's electronic data. LAB will utilize anti-virus programs on a best efforts basis in preparation of the electronic data transfer, but LAB makes no warranty as to the effectiveness of such screening. LAB will also use its best efforts to ensure that its electronic data will meet all criteria as specified by Client, including criteria regarding date/time data, if, and when, included; but LAB makes no warranty as to the appropriateness of the client specified criteria by accepting the same.

In addition to indemnities contained in the underlying agreement between LAB and Client, Client shall hold LAB harmless from any claims, suits or liability arising from or related to electronic data supplied pursuant to this Agreement. Any reuse of original or altered files by Client shall be at Client's risk and without liability or responsibility to LAB, but shall entitle LAB to additional compensation for such unauthorized reuse. In no event will LAB's liability for electronic data include any special, incidental or consequential damages, whether or not LAB has knowledge of the potential for loss or damage.

11. **Force Majeure.** LAB shall have no responsibility or liability to the Client for any failure or delay in performance by LAB which results in whole or in part from any cause or circumstance beyond the reasonable control of LAB. Such causes and circumstances shall include, but not be limited to, acts of God, acts of Client, acts or orders of any government authority, strikes or other labor disputes, natural disasters, accidents, wars, civil disturbances, difficulties or delays in transportation, mail or delivery services, inability to obtain sufficient services or supplies from LAB's usual suppliers, or any other cause beyond LAB's reasonable control.

Oregon

DEPARTMENT OF
ENVIRONMENTAL
QUALITY

NORTHWEST REGION

OCT 26 1993

Peter Kramer
Vice President and General Manager
Schnitzer Steel Industries Inc
dba Schnitzer Steel Products Co
12005 N Burgard Road
Portland OR 97213

Re: NPDES Storm Water Discharge Permit
File No. 108103
Multnomah County
ORR60-0289

Enclosed is your National Pollutant Discharge Elimination System (NPDES) Storm Water Discharge Permit.

Please review the permit carefully. As the permittee, you are required to develop a Storm Water Pollution Control Plan within six months of permit issuance and sample your storm water twice a calendar year. There are also storm water discharge limitations that you are required to meet within a year of receiving your permit. (The date the permit was issued to you is located in the upper left-hand corner of the name and address label on the front page of the permit.)

We request that you monitor your storm water at least once in 1993. We do not have a special monitoring report for your use. You may submit your data in letter form by July 1 of each year. If there are no rainfall events from which you can collect a sample during any given year, please send us a note by July 1 stating that fact.

If you have any questions about the permit, please contact Paul Keiran at (503) 229-5263, Ext. 269.

Sincerely,

George Davis for

Charles K. Ashbaker, Manager
Water Quality, Northwest Region

js
Enclosure
cc: Environmental Protection Agency (w/encl.)
Water Quality Division, DEQ
File

Schnitzer Steel Industries Inc (letter only)
3200 NW Yeon Avenue
PO Box 10047
Portland OR 97210-0047

1500 SW First Avenue
Suite 750
Portland, OR 97201-5884
(503) 229-5263
DEQ-1

SCHN00245976

GENERAL PERMIT
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
STORM WATER DISCHARGE PERMIT

Department of Environmental Quality
811 Southwest Sixth Avenue, Portland, OR
Telephone: (503) 229-5696

Issued pursuant to ORS 468.740 and The Federal Clean Water Act

ISSUED TO:

ISSUED 10/26/93 GEN12R Multnomah/NWR
File No. 108103 ORR60-0289

Schnitzer Steel Industries, Inc.
3200 NW Yeon Avenue
PO Box 10047
Portland OR 97210-0047

Re: Schnitzer Steel Products Co., 12005 N Burgard Road, Portland OR 97213

SOURCES COVERED BY THIS PERMIT:

Metal scrapyards, battery reclaimers, and salvage yards classified under Standard Industrial Classification (SIC) Codes 5015 and 5093; automobile wrecking yards; and hazardous waste treatment, storage, or disposal activities.

Lydia Taylor, Administrator

SEP 24 1991
Date

PERMITTED ACTIVITIES

Until this permit expires or is modified or revoked, the permittee is authorized to construct water pollution control facilities and to discharge storm water to public waters in accordance with a storm water pollution control plan which has been prepared by the permittee and any other limitations specified in this permit. All discharges shall be in accordance with the attached schedules:

	Page
Schedule A - Controls and Limitations for Discharge.....	2-5
Schedule B - Minimum Monitoring and Reporting Requirements.	6
Schedule C - Compliance Conditions and Schedules.....	7
Schedule D - Special Conditions.....	8
General Conditions.....	Attached

Each other direct and indirect waste discharge to public waters is prohibited unless covered by another NPDES permit.

This permit does not relieve the permittee from responsibility for compliance with any other applicable federal, state, or local law, rule, standard, ordinance, order, judgment, or decree.

SCHEDULE A

Controls and Limitations for Storm Water Discharges

1. The Permittee shall implement a **Storm Water Pollution Control Plan (SWPCP)**. For those facilities which employ 5 people or more, the SWPCP shall be prepared by or reviewed and stamped by a registered engineer or architect. SWPCP shall include at least the following items:

   a. Site Description Each plan shall, at a minimum, provide the following:

      (1) A description of the nature of the industrial activities conducted at the site, including a description of "significant materials" (see Definitions) that are treated, stored or disposed of in a manner to allow exposure to storm water; and the methods of treatment, storage or disposal.

      (2) A general location map showing the location of the site in relation to major transportation routes, surface waters and other relevant features.

      (3) A site map indicating: drainage patterns; each drainage and discharge structure; an outline of the drainage area of each storm water outfall; paved areas and buildings within the drainage area of each discharge point; areas used for outdoor manufacturing, storage or disposal of significant materials; each existing structural control measure for reducing pollutants in storm water runoff; materials loading and access areas; hazardous waste storage or disposal facilities; location of wells (including waste injection wells, seepage pits, dry wells, and etc.), springs, wetlands and other surface water bodies.

      (4) Estimates of the amount of impervious surface area (including paved areas and building roofs) relative to the total area drained by each storm water outfall.

      (5) For each area of the site which generates storm water associated with site activities and where a reasonable potential exists for contributing significant amounts of pollutants to storm water runoff, identify the potential pollutants which could be present in storm water discharge.

      (6) The names of the receiving water(s), or if the discharge is to a municipal separate storm sewer, the name of the municipal operator of the storm sewer and the ultimate receiving waters.

      (7) Identify the discharge outfalls and the point or points where storm water monitoring will occur as required by this permit.

b. Controls Each operator covered by this permit shall develop a description of controls appropriate for the site and a time line for implementing such controls. The following minimum components shall be addressed along with a schedule for implementation:

(1) Storm Water Management - The plan shall contain a narrative description of the materials and storm water management practices employed or scheduled for employment, to minimize contact of significant materials with storm water runoff; structural and non-structural control measures to reduce pollutants in storm water runoff; treatment (if any) and ultimate disposal of solid or fluid wastes other than by surface discharge. In developing the plan the permittee shall consider but not be limited to the following management practices:

A. Containment - All hazardous chemicals shall be stored within berms or other secondary containment devices to prevent leaks and spills from entering storm water runoff.

B. Oil & Grease Separation - Oil/water separators, booms, skimmers or other methods should be employed to minimize oil contaminated storm water discharge.

C. Debris & Sediment Control - Screens, booms, sediment ponds or other methods should be employed to reduce debris and sediment in storm water discharge.

D. Waste Chemical Disposal - Waste chemicals such as antifreeze, degreasers, used oils, etc. shall be recycled or disposed of in an approved manner and in a way which prevents them from enteirng stormwater discharges.

E. Storm Water Diversion - Wherever possible, storm water should be diverted away from materials manufacturing, storage and other areas of potential storm water contamination.

F. Covered Storage or Manufacturing Areas - Wherever practicable, fueling operations, materials manufacturing and storage areas should be covered to prevent contact with storm water.

(2) Spill Prevention and Response Procedures - Areas where potential spills of significant materials can impact storm water runoff and their associated drainage points shall be clearly identified. Methods to prevent spills along with cleanup and notification procedures shall be identified in the plan and made available to the appropriate personnel. The required cleanup equipment must be on site or readily available.

(3) Preventive Maintenance - A preventive maintenance program should be implemented to insure the effective operation of materials management facilities, structural and non-structural control facilities, and any treatment facilities used to comply with the requirements of this permit. The preventive maintenance program should include the following:

A. Areas where potential spills of significant materials could impact storm water runoff, control structures, and any treatment facilities should be inspected monthly during the rainfall season.

B. A regular program of cleaning and repairing storm water control structures, treatment facilities, and materials handling and storage facilities should be conducted throughout the rainfall season.

(4) Employee Education - An employee awareness program should inform personnel of the components and goals of the SWPCP, and address spill response procedures, good housekeeping and materials management practices.

(5) Record Keeping and Internal Reporting Procedures - Incidents of spills or leaks of significant materials which could impact storm water runoff, along with corrective actions, surface water discharge (if any), and other relevant information should be included in the plant records. Inspection and maintenance activities such as cleaning and repairing storm water control and treatment facilities should also be documented and recorded.

(6) Annual Plan Review - A full plan review should be made by the permittee annually, prior to the onset of the rainfall season. The plan review should include a complete site inspection of all areas where potential spills of significant materials can impact storm water runoff. The SWPCP should be updated as necessary.

2. The Storm Water Pollution Control Plan shall include procedures for meeting any Oregon Administrative Rules (OARs) for storm water control specific to the applicable river basin. These procedures should include a schedule of steps and key milestone dates for implementing monitoring activities, materials management practices, and SWPCP plan components not already in place at the time the permit is issued. No condition of this permit shall release the permittee from any responsibility or requirements under other environmental statutes or regulations.

3. Storm water carrying pollutants regulated by this permit shall not be allowed to discharge to seepage ponds, seepage pits, dry wells, injection wells, or any other on-site disposal facilities if discharge to surface waters is possible. If discharge to surface waters is not possible and on-site disposal methods are used, the storm water discharge limitations and monitoring requirements of this permit shall still apply, in addition to the limitations and restrictions found in OAR 340-44-050, Waste Disposal for Surface Drainage and OAR 340, Division 40, Groundwater Quality Protection.

4. **Specific Storm Water Discharge Limitations**
(These limitations apply at each point source discharge.)

Parameters	Limitations
Oil & Grease	Shall not exceed 10 mg/L
pH	Shall be between 6 and 9
Toxicity	No discharge of toxic chemicals in "toxic concentrations"* permitted

* Toxic concentrations is defined in the definitions, page 7 of attached General Conditions.

5. Allowable Mixing Zone - Notwithstanding the effluent limitations in this permit, no wastes shall be discharged and no activities shall be conducted which will violate applicable water quality standards as adopted in OAR 340, Division 41, except within a mixing zone in the receiving stream of a size which would provide a 10:1 dilution of the storm water discharged.

6. Storm Water Only - This permit regulates the discharge of storm water only. It does not authorize the discharge of process wastewaters, vehicle wash waters, cooling waters, or any other wastewaters associated with the facility. Other discharges must be addressed in a separate NPDES permit.

SCHEDULE B

Minimum Monitoring and Reporting Requirements
(unless otherwise approved in writing by the Department)

1. Parameters - The permittee shall make visual observations and analyze grab samples of all storm water point source discharges for the following parameters:

   A. Primary Parameters:

      i. Color and Foam (visual observation)
      ii. Oil & Grease Sheen (visual observation)*
      iii. pH
      iv. Oil & Grease (mg/L)
      v. Conductivity (MHO/cm)
      vi. COD (mg/L)
      vii. TOC (mg/L)
      viii. Metals **
      ix. Total Suspended Solids (mg/L)

      * Whenever a visible oil sheen is detected in a storm water discharge during a required monthly visual observation, it shall be sampled for Oil & Grease.

      ** Arsenic, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, and Zinc.

   B. Other Parameters:

      i. Any pollutant limited or requiring monitoring in the facility's existing NPDES or WPCF permit except for biomonitoring and flow.
      ii. Any parameter for which the receiving stream is water quality limited, if the facility discharges storm water to a water quality limited stream with established Total Maximum Daily Loads (TMDL).

2. Frequency of Monitoring - Sampling for compliance with this section shall be conducted two times per year, with samples being collected at least 60 days apart. One of the samples shall be collected during the month in the fall when runoff first occurs. Visual observations of surface drainage areas shall be made monthly, during those months when at least one storm event occurs which produces runoff.

3. Records Retention and/or Reporting - Permittees are required to tabulate the data and submit it to the appropriate DEQ Regional Office by July 1 of each year. All records shall be retained by the permittee for a period of at least 5 years.

4. Representative Sampling - All sampling shall be representative of the discharge.

SCHEDULE C

Compliance Conditions and Schedules (unless otherwise approved in writing by the Department)

1. Within 180 days of receiving this permit, the permittee shall complete a Storm Water Pollution Control Plan (SWPCP) as required by Schedule A, Condition 1.

2. The permittee shall be in compliance with the SWPCP and the effluent limitations in this permit within 360 days of receiving this permit.

3. The permittee is expected to meet the compliance dates which have been established in this schedule. Either prior to or no later than 14 days following any lapsed compliance date, the permittee shall submit to the Department a notice of compliance or noncompliance with the established schedule. The Department may revise a schedule of compliance if good and valid cause over which the permittee has little or no control has been determined.

SCHEDULE D

Special Conditions

1. Waste Load Allocation - If storm water monitoring indicates that a pollutant parameter, for which a stream is water quality limited, is discharging to a water quality limited stream in significant quantities, the permit may be reopened and a waste load allocation for the pollutant added.

2. Additional Limitations or Monitoring Required - If storm water monitoring indicates that certain pollutants are being discharged in quantities which may be a threat to the water quality of the receiving stream, the permit may be reopened and additional effluent limits and/or monitoring requirements added.

3. Releases in Excess of Reportable Quantities. This permit does not relieve the permittee of the reporting requirements of 40 CFR 117 and 40 CFR 302. The discharge of hazardous substances in the storm water discharge(s) from a facility shall be minimized in accordance with the applicable storm water pollution control plan for the facility required by this permit, and in no case, during any 24-hour period, shall the discharge(s) contain a hazardous substance equal to or in excess of reporting quantities.

4. Disposition of SWPCP - The Storm Water Pollution Control Plan, required by Schedule A, Condition 1, shall be kept at the site and made available to the Department upon request.

5. Reporting to Municipality - Any permitted facility discharging to a municipal storm sewer shall provide the municipality with a copy of the monitoring report required by Schedule B. A copy of the SWPCP shall also be provided the municipality upon request.

GEN\WC8979 (4-7-92)

STORM WATER NPDES PERMIT GENERAL CONDITIONS

SECTION A. STANDARD CONDITIONS

1. Duty to Comply

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Oregon Revised Statutes (ORS) 468.720 and is grounds for enforcement action; for permit termination; suspension or modification; or for denial of a permit renewal application.

2. Penalties for Violations of Permit Conditions

Oregon Law (ORS 468.990) classifies a willful or negligent violation of the terms of a permit or failure to get a permit as a misdemeanor and a person convicted thereof shall be punishable by a fine of not more than $25,000 or by imprisonment for not more than one year, or by both. Each day of violation constitutes a separate offense.

In addition to the criminal penalties specified above, Oregon Law (ORS 468.140) also allows the Director to impose civil penalties up to $10,000 per day for violation of the terms or conditions of a permit.

3. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment and human health resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

4. Permit Actions

The Department may revoke a general permit as it applies to any person and require such person to apply for and obtain an individual NPDES permit if:

a. The covered source or activity is a significant contributor of pollution or creates other environmental problems;

b. The permittee is not in compliance with the terms and conditions of this general permit; or

c. Conditions or standards have changed so that the source or activity no longer qualifies for a general permit.

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5. General Permit Coverage

a. Any permittee not wishing to be covered or limited by this general permit may make application for an individual NPDES permit in accordance with NPDES procedures in OAR 340-45-030.

b. This general permit does not cover activities or discharges covered by an individual NPDES permit until the individual permit has expired or been canceled. Any person conducting an activity covered by an individual permit but which could be covered by this general permit may request that the individual permit be canceled.

c. All persons desiring to be covered by this general permit must register with the Department on forms provided by the Department. Registration applications for this general permit shall be sent to:

Department of Environmental Quality
Water Quality Division
811 SW 6th Avenue
Portland, OR 97204

Note: Applicable permit fees must accompany the application.

6. Toxic Pollutants

The permittee shall comply with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants within the time provided in the regulations that establish those standards or prohibitions.

7. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

8. Plan Approval

Plans and specifications for pollution control facilities shall be submitted to DEQ for review and approval prior to construction, in accordance with Oregon Administrative Rules Chapter 340 Division 42.

SCHN00245986

SECTION B. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. Proper Operation and Maintenance

   The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by the permittee to achieve compliance with the conditions of this permit.

2. Duty to Halt or Reduce Activity

   Upon reduction, loss, or failure of a storm water treatment or control facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control all discharges until the facility is restored or an alternative method of treatment is provided.

3. Bypass of Treatment Facilities

   Bypassing of treatment facilities is generally prohibited.

4. Removed Substances

   Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering public waters, creating a nuisance or creating a health hazard.

SECTION C. MONITORING AND RECORDS

1. Representative Sampling

   Sampling and measurements taken as required herein shall be representative of the monitored discharge. All samples shall be taken at the monitoring points specified in this permit and/or the Storm Water Pollution Control Plan, unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body of water, or substance. Monitoring points shall not be changed without notification to and the approval of the Department.

2. Monitoring Procedures

   Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit.

SCHN00245987

3. Penalties of Tampering

The Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate, any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

4. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR 136 or as specified in this permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR. Such increased frequency shall also be indicated.

5. Averaging of Measurements

Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean, except for coliform and fecal coliform bacteria which shall be averaged based on a geometric or log mean.

6. Retention of Records

The permittee shall retain records of all monitoring information, including all calibration and maintenance records, of all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 5 years from the date of the sample, measurement, or report of application. This period may be extended by request of the Department at any time.

7. Records Contents

Records of monitoring information shall include:

a. The date, exact place, time and methods of sampling or measurements;
b. The individual(s) who performed the sampling or measurements;
c. The date(s) analyses were performed;
d. The individual(s) who performed the analyses;
e. The analytical techniques or methods used; and
f. The results of such analyses.

SCHN00245988

8. Inspection and Entry

The permittee shall allow the Department, or an authorized representative upon the presentation of credentials and other documents as may be required by law, to:

a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit, and

d. Sample or monitor at reasonable times, for the purpose of assuring permit compliance or as otherwise authorized by the Clean Water Act, any substances or parameters at any location.

SECTION D. REPORTING REQUIREMENTS

1. Anticipated Noncompliance

The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

2. Transfers

This permit may be transferred to a new permittee provided the transferee acquires a property interest in the permitted activity and submits a transfer application within 60 days of the change in property interest. The transfer application will require the transferee to commit to fully comply with all the terms and conditions of the permit and the rules of the Commission.

3. Twenty-Four Hour Reporting

The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally (by telephone) within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 working days of the time the permittee becomes aware of the circumstances. The written submission shall contain:

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a. A description of the noncompliance and its cause;

b. The period of noncompliance, including exact dates and times;

c. The estimated time noncompliance is expected to continue if it has not been corrected; and

d. Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

Note: The Department may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

e. The following shall be included as information which must be reported within 24 hours:

(1) Any unanticipated bypass which exceeds any effluent limitation in the permit.

(2) Any upset which exceeds any effluent limitation in the permit.

4. Other Noncompliance

The permittee shall report all instances of noncompliance not reported under Section D, Paragraph D-3, at the time monitoring reports are submitted unless required otherwise in Schedule B of this permit. The reports shall contain the information listed in Paragraph D-3.

5. Duty to Provide Information

The permittee shall furnish to the Department, within a reasonable time, any information which the Department may request to determine whether cause exists for revoking coverage by this permit, or to determine compliance with this permit. The permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.

6. Signatory Requirements

All applications, reports or information submitted to the Department shall be signed and certified in accordance with 40 CFR 122.22.

SCHN00245990

7. Falsification of Reports

The Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than six months per violation, or by both.

SECTION E. DEFINITIONS AND ACRONYMS

1. "BOD_5" means five-day biochemical oxygen demand.

2. "COD" means chemical oxygen demand.

3. "Department" means Department of Environmental Quality.

4. "FC" means fecal coliform bacteria.

5. "MGD" means million gallons per day.

6. "mg/L" means milligrams per liter.

7. "mL/L" means milliliters per liter.

8. "Point Source Discharge" means a discharge from any discernible, confined, and discrete conveyance, including, but not limited to, any pipe, ditch, channel, tunnel, or conduit.

9. "Reportable Quantities" means those quantities of hazardous substances listed in Table 117.3 of The Code of Federal Regulations, 40 CFR 117.

10. "Significant material" includes, but is not limited to: raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under Section 101(14) of CERCLA; any chemical the facility is required to report pursuant to Section 313 of Title III of SARA; fertilizers; pesticides; and waste products such as ashes, slag and sludge that have the potential to be released with storm water discharges.

11. "TOC" means total organic carbon

12. "TOX" means total organic halides

13. "TSS" means total suspended solids (non-filterable residue).

SCHN00245991

14. "Toxic concentration" means lethality to aquatic life as measured by a significant difference in lethal concentration between the control and 100 percent effluent in an acute bioassay test.

15. "Regional Office" means the following field offices of DEQ which cover the listed counties:

Northwest Region - Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington counties.

Willamette Valley Region - Lane, Lincoln, Linn, Marion, Polk, and Yamhill counties.

Southwest Region - Coos, Curry, Douglas, Jackson, and Josephine counties.

Eastern Region - Baker, Gilliam, Grant, Malheur, Morrow, Umatilla, Union, Wallowa, and Wheeler counties.

Central Region - Crook, Deschutes, Harney, Hood River, Jefferson, Klamath, Lake, Sherman, and Wasco counties.

SCHN00245992

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Fax: (202) 338-5534

(202) 342-8856

TV. Daniel Lee
Tim Todd
Nick Andryshun
fyi TM

MEMORANDUM

January 29, 1996

TO: JAMES F. COLLINS
STEEL MANUFACTURERS ASSOCIATION

FROM: COLLIER, SHANNON, RILL & SCOTT

RE: STATE STORM WATER UPDATES

We have attached a summary of the storm water regulatory programs for each of the 50 states, the District of Columbia and Puerto Rico.

The U.S. Environmental Protection Agency ("EPA") issued regulations in 1990, requiring the steel industry and other specified storm water dischargers to file a Notice of Intent ("NOI") for coverage under a general permit, apply for an individual permit, or participate in a two-part group permit application. Nearly all storm water permits require the development and implementation of a Storm Water Pollution Prevention Plan ("SWPPP") as the "keystone" to compliance. Many, but not all, storm water permits also require permittees to collect and analyze samples of their storm water discharges.

There are a variety of storm water permit issuing authorities. EPA is the permitting authority for 11 "non-delegated" states (Alaska, Arizona, Florida, Idaho, Louisiana, Maine, Massachusetts, New Hampshire, New Mexico, Oklahoma and Texas.) Thirty-nine states have applied for and been approved by EPA to issue their own storm water permits. These states are called "delegated" states. SMA members' permitting options, thus, vary depending upon the applicable permitting authority.

In 1992, EPA promulgated its baseline general permit.[1/] This is one permitting option in non-delegated states. On September 29, 1995, the Agency promulgated its final multi-sector general permit ("MSGP").[2/] The MSGP was developed in response to group applications and represents the other permitting option in non-delegated states. (EPA has discouraged individual permits, although this permitting option technically is available). Steel manufacturers that require permits in the 11 "non-delegated" states must choose between EPA's baseline general permit and the MSGP.

Many of the 39 "delegated" states have developed their own general permits (many based on EPA's 1992 baseline general permit) and have required steel manufacturers (both group members and non-group members) to file for coverage under such permits. However, several of the delegated states have expressed the intention to promulgate "cloned" or adapted versions of EPA's MSGP.

SMA members should note that the deadlines for obtaining coverage under a storm water permit in some delegated states already have passed. Although enforcement actions are possible, most states have indicated that they still are accepting applications for coverage without enforcement repercussions. SMA members should confirm that they have obtained and are in compliance with applicable storm water permits in their delegated states, if necessary.

The attached State Update provides a summary of the storm water regulatory programs in both the delegated and non-delegated states. The summary includes much of the information provided to SMA members in the past in various state-specific memoranda we prepared. The summary also updates steel manufacturers on the latest developments in all 50 states (delegated and non-delegated) and indicates whether the delegated state plans on utilizing all or portions of the MSGP.

Finally, compliance with general permits and other storm water regulations ultimately is a site-specific task. The guidance included in this summary is intended to inform SMA members about basic requirements and provide permitting authority "contacts" should members need additional or specific information, copies of permits and NOIs, or other guidance.

1/ For Alaska, Arizona, Florida, Idaho, Louisiana, Maine, New Hampshire, New Mexico, Oklahoma and Texas, see 57 Fed. Reg. 41,236 (September 9, 1992). For Massachusetts and the District of Columbia, see September 9, 1992 and 57 Fed. Reg. 44,438 (September 25, 1992). For Puerto Rico, see September 9 and 25, 1992 and 58 Fed. Reg. 49,996 (September 24, 1993).

2/ See 60 Fed. Reg. 50,804 (September 29, 1995).

Oregon

DEPARTMENT OF
ENVIRONMENTAL
QUALITY

NORTHWEST REGION

January 2, 1996

MR PETER KRAMER
SCHNITZER STEEL PRODUCTS COM.
12005 N BURGARD ROAD
PORTLAND OR 97210

RE: WQ- Multnomah County
SCHNITZER STEEL PRODUCTS
File #108103, Permit #1200-R
WQ-NWR-95-177
NOTICE OF NONCOMPLIANCE

Dear Mr. Kramer:

The laboratory results from your sampling efforts for the 1994 - 1995 monitoring period show that your facility's stormwater discharges have violated permit limitations for oil and grease and pH. The samples on **February 17, 1995** at various outfalls revealed oil and grease concentrations exceeding the permit limitation of **10** milligrams per liter (mg/L). The sample on the same day also showed a pH value of **9.8** exceeding the permit limitation of **6-9**. Thus you have violated Oregon Revised Statutes 468B.050(1)(a),(c) by discharging wastes, in excess of the permissive discharges specified by your permit, into waters of the state. This is a Class II violation of your permit.

Excessive levels of oil and grease in water body can have acute lethal toxicity or long-term sublethal toxicity to both aquatic and benthic organisms. Oil pollutants may be incorporated into sediments and remain unchanged and toxic for long time due to their slow bacteria degradation. Oils of any kind can also cause adverse aesthetic effects on shorelines and beaches.

The hydrogen-ion concentration or pH is an important quality parameter of both natural waters and wastewaters. The concentration range suitable for the existence of most biological life is quite narrow and critical. Stormwater with an adverse concentration of hydrogen-ion may alter the concentration in the waters of the state thus adversely affecting the beneficial use of these waters. The purpose of the stormwater permit is to control pollutant discharges to surface waters during the storm events.

John A. Kitzhaber
Governor

2020 SW Fourth Avenue
Suite 400
Portland, OR 97201-4987
(503) 229-5263 Voice
TTY (503) 229-5471

Oregon Administrative Rule 340-12-041(2)(c) provides that a permittee shall not receive more than three NONs for Class II violations of the same permit within a thirty-six (36) month period without being issued a more formal enforcement action called a Notice of Permit Violation (NPV). The Department may, however, issue an NPV prior to the third NON. The Department requests your cooperation in ensuring that this violation does not recur.

This Notice of Noncompliance (NON) requires that you make an effort to determine the source(s) of this pollution and that you take steps to both reduce it and isolate it from your site's stormwater discharges. Steps that can be taken include covering materials that are being contacted by stormwater, improving housekeeping practices, placing simple stormwater treatment devices into catch basins or drainage ditches and other measures, which either remove pollutants from stormwater or limit the water's exposure to polluting materials.

Prior to your next sampling event, please communicate to the Department any changes made on site, which you anticipate will improve the quality of stormwater leaving your facility. If you cannot determine the source(s) of your violation, please advise as such in writing.

If you have any questions regarding this NON, please contact Paul Keiran at 229-5937.

Sincerely,

Neil J. Mullane

Neil J. Mullane, Manager
Water Quality Source Control Section
Northwest Region

E:\BWU\STORM\NONS\OG&PHLTR.DOC

Oregon

DEPARTMENT OF ENVIRONMENTAL QUALITY

March 20, 1996

ALN1ZR--108105/A--MOLTNOMAN
Peter Kramer
SCHNITZER STEEL INDUSTRIES, INC. - DDA
12005 N Burgard Road
Portland, OR 97210

Re: Storm Water Permit Renewal

Our records indicate that your present National Pollutant Discharge Elimination System (NPDES) General Storm Water Discharge Permit will expire later this year. To renew your permit, please complete the enclosed renewal application form and return it to the Department's Business Office with the required fee of $80 ($50 filing fee and $30 application processing fee). If you recently applied for or received a permit, you must still submit the renewal application and fee so we can renew your permit later this year.

If you require an invoice for the fee, please contact the Department at the numbers listed below. Your application must be submitted as soon as possible but no later than your permit expiration date. If you wait until your permit expires, you will have to submit a new initial application and pay higher fees.

Please note that the renewal fee should not be confused with the annual compliance fee you are invoiced for in July. The renewal fee is used to review applications and develop modifications to the storm water permits. The annual compliance fee is used to review storm water data and conduct inspections.

You will have an opportunity to comment on a proposed permit prior to renewal. The Department will notify you by mail when this comment period opens. After the comment period closes, the Department will renew the permit. If the renewal process is not completed by your permit expiration date, your current permit will remain in effect provided we have your renewal application on file.

If you have any questions, I may be reached at (503) 299-5046 or 1-800-452-4011, toll free inside Oregon. You may also contact your local DEQ office (see names and numbers on back). Thank you for your prompt attention to this matter.

Sincerely,

Ranei L. Nomura

Ranei L. Nomura
Storm Water Coordinator
Water Quality Division

RLN:orw
SW\WC14\WC14070.Doc
Enclosure: Renewal Application
cc: Regional DEQ Offices

811 SW Sixth Avenue
Portland, OR 97204-1
(503) 229-5696
TDD (503) 229-6993

SCHN00246010

CHECK REQUEST FORM

VENDOR NO. _____ BANK _____ COMPANY SSI

ISSUE CHECK TO: Oregon Dept. of Environmental Quality
Business Department
811 SW Sixth Avenue
Portland, OR 97204

INVOICE NO. _____ DESCRIPTION Filing fee for renewing
DATE 5/29/96 I.T. stormwater permit
AMOUNT $80.00
DUE DATE 6/10/96

COMMENTS _____

SIGNATURES

PREPARED BY Timothy K. Todd

AUTHORIZATION _____

AUTHORIZATION _____

G/L DISTRIBUTION

DESCRIPTION	ACCOUNT NO	AMOUNT
	___-___-___-___-___-___	$___,___,___.__
	___-___-___-___-___-___	$___,___,___.__
	___-___-___-___-___-___	$___,___,___.__
	___-___-___-___-___-___	$___,___,___.__
	___-___-___-___-___-___	$___,___,___.__

CHECK AMOUNT _____

SPECIAL HANDLING INSTRUCTIONS Mail to DEQ w/attached applicat in.

REV. 1/90

SCHN00246011

IW/STORM - NWR

DEQ USE ONLY – REGIONAL OFFICE
Received:
Application No.:
File No.: 108103
EPA No.:
Mail ID #2/#9:
Hydrocode:
DOC Conf.:

APPLICATION FOR *RENEWAL* OF NPDES STORM WATER DISCHARGE GENERAL PERMIT

STATE OF OREGON

(Attach additional sheets if necessary.)

DEQ USE ONLY – BUSINESS OFFICE
Date Received:
Amount Received:
Check No.:
Deposit No.:
NOTES:

A. FACILITY INFORMATION

1. Legal Name & Address of Applicant:
   Schnitzer Steel Industries, Inc.
   P.O. Box 10047
   Portland, OR 97210

2. Site Name & Address if **different** than item '1':
   Schnitzer Steel Products Co.
   12005 North Burgard Rd.
   Portland, OR 97213

3. Contact Person: Timothy Todd
   Telephone No.: 503/286-6944
   Address: Schnitzer Steel
   PO Box 10047
   Portland OR 97210

4. Permit Number: 1200 R

5. File No.: 108103

6. Primary SIC Code & Title: 5093 - Scrap & waste materials

B. STORM WATER DISCHARGE INFORMATION

1. Briefly describe any activities that have been added, removed, or changed since your previous application:
   None.

2. Briefly describe any changes made to the number or location of storm water outfalls or flows off your property:
   None

3. Have any changes been made to cause your storm water to discharge to a different waterbody, storm sewer system, or seepage system? ☐ Yes ☒ No (If "Yes", please describe:)

4. Have you completed your Storm Water Pollution Control Plan? ☒ Yes – completed on 3/21/95 ☐ No – not completed ☐ No – not due until

5. Have you submitted storm water monitoring data to DEQ as required by your permit? ☒ Yes ☐ No (If "No", please submit data with this application.)

C. DISCHARGES OTHER THAN STORM WATER

1. Have all non-storm water discharges to the ground or surface waters been either discontinued, permitted by DEQ, or discharged into municipal sanitary sewer? ☒ Yes ☐ No ☐ Never Existed

2. If item '1' above is "No", what non-storm water discharges to the ground or surface waters continue without permit?

D. SIGNATURE

I HEREBY CERTIFY THAT THE INFORMATION THAT IS INCLUDED IN THIS APPLICATION IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

Name of Legally Authorized Representative – *See Instructions*
(Please Type or Print Clearly)

Title

Signature

Date

FACILITY SURVEY

If your facility is located in one of the following six counties: Clackamas, Clatsop, Columbia, Multnomah, Tillamook, or Washington, you will need to complete and return this survey. Please complete the Facility Information section, along with either the A or B section below, fold, stamp, staple, and return by May 31, 1996. Please type or print clearly. Feel free to attach additional sheets, if necessary.

Facility Information:

Facility Name: Alaska Steel Co.
Address: 3200 NW Yeon / Po Box 10047
Portland 97210
Contact Person: Timothy Todd
Phone Number: 503/286-6944
SIC Code:

A. I do not believe that the activities at my facility require a storm water permit:
(check one of the boxes)

☒ 1) The processing and storage of all materials (raw, intermediate and final products) takes place under cover, never exposed to storm water. Facility is an office building for administration only — no processing, etc. takes place here.

☐ 2) There is no storm water runoff into drains or ditches from this facility.

☐ 3) Other (please explain): _____

B. I believe that I need a storm water permit and would like to apply:

☐ Please send an application packet to me at the above address.

Signature: Timothy R Todd Date: 5/17/96

Note : If you are not sure you need a permit, you may obtain additional information by attending one of the following information session:
June 12th afternoon, starting at 1:00 p.m. and June 14th morning, starting at 9:00 a.m. at the Department's Northwest Regional Office, 2020 SW 4th Ave., Suite 400, Room A/B, Portland, Oregon.

FACILITY SURVEY

If your facility is located in one of the following six counties: Clackamas, Clatsop, Columbia, Multnomah, Tillamook, or Washington, you will need to complete and return this survey. Please complete the Facility Information section, along with either the A or B section below, fold, stamp, staple, and return by May 31, 1996. Please type or print clearly. Feel free to attach additional sheets, if necessary.

Facility Information:

Facility Name: SSP Arion Corporation
Address: 3200 NW Yeon Avenue / PO Box 10047
Portland, OR 97211
Contact Person: Timothy Todd
Phone Number: 503/286-6944
SIC Code:

A. I do not believe that the activities at my facility require a storm water permit:
(check one of the boxes)

☒ 1) The processing and storage of all materials (raw, intermediate and final products) takes place under cover, never exposed to storm water. Facility is an office Bldg — No processing or storage of anything takes place at this facility

☐ 2) There is no storm water runoff into drains or ditches from this facility.

☐ 3) Other (please explain): _____

B. I believe that I need a storm water permit and would like to apply:

☐ Please send an application packet to me at the above address.

Signature: Timothy K. Todd Date: 5/17/96

Note : If you are not sure you need a permit, you may obtain additional information by attending one of the following information session:
June 12th afternoon, starting at 1:00 p.m. and June 14th morning, starting at 9:00 a.m. at the Department's Northwest Regional Office, 2020 SW 4th Ave., Suite 400, Room A/B, Portland, Oregon.

May 8, 1996

Storm Water Pollution Control Permit Program

The Oregon Department of Environment Quality Northwest Region is offering

A GRACE PERIOD

for obtaining a Storm Water Pollution Control Permit.

Please read the enclosed information to determine whether your facility comes under the provisions of this program.

State of Oregon
Department of Environmental Quality — Memorandum

Date: May 8, 1996

To: Potential Storm Water Permittees

From: Oregon Department of Environmental Quality

Subject: Storm Water Permits

The Oregon Department of Environmental Quality (Department) is responsible for issuing Storm Water Permits under the Clean Water Act. The purpose of this permit program is to ensure that storm water runoff from Industrial sites does not pollute streams and rivers in Oregon.

Recent studies have shown that storm water runoff from industrial, agricultural, commercial and residential areas is likely to contain elevated pollutant levels. In fact, the United States Environmental Protection Agency (EPA) links storm water to "one-third of all assessed surface water quality impairments nationwide by transporting large quantities of pollutants to our nations's waterways." In an effort to reduce pollutants in storm water runoff, the Department has been issuing federal storm water permits since October of 1992. These permits are required of certain industries, based on their Standard Industrial Classification (SIC) code.

Storm water permits serve a variety of purposes. First, they help to protect the environment. The permits require that facilities look at their overall operations and take the steps necessary to maintain storm water pollutant concentrations at an acceptable level. Second, the permit protects the facility. The law requires that certain facilities obtain a permit and meet certain standards. Third, the required monitoring helps the facility recognize potential problems and provides time to rectify them. Finally, the monitoring also helps the facility see the benefits derived from improvements in its practices and processes.

We understand that some facility owners may not be aware of the permitting process, so we are allowing a grace period when permits will be issued without enforcement actions being taken. For the facilities requesting storm water permits, the grace period will extend through the application and permitting period. Please complete the attached survey form and return it to the Department before May 31, 1996.

Your facility may be exempted from the program if you can show that no pollutants are exposed to storm water runoff, and if your facility meets the criteria described in Section A of the attached survey.

If you are unsure whether these requirements apply to your facility or would like to discuss them with a representative of the Department, feel free to attend an information session. Sessions will be offered on: June 12th afternoon, starting at 1:00 p.m. and June 14th morning, starting at 9:00 a.m. in Room A/B of the Department's Northwest Regional office, located at 2020 Southwest Fourth Avenue, Suite 400, Portland.

The Department appreciates your prompt action and cooperation in this matter. If you have any questions, please feel free to contact Binhong Wu at (503) 229-5160.

If you are unsure whether these requirements apply to your facility or would like to discuss them with a representative of the Department, feel free to attend an information session. Sessions will be offered on: June 12th afternoon, starting at 1:00 p.m. and June 14th morning, starting at 9:00 a.m. in Room A/B of the Department's Northwest Regional office, located at 2020 Southwest Fourth Avenue, Suite 400, Portland.

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Your facility may be exempted from the program if you can show that no pollutants are exposed to storm water runoff, and if your facility meets the criteria described in Section A of the attached survey.

May 8, 1996

Storm Water Pollution Control Permit Program

The Oregon Department of Environment Quality Northwest Region is offering

A GRACE PERIOD

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Please read the enclosed information to determine whether your facility comes under the provisions of this program.

Tim Todd -
P/S make
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TM

May 8, 1996

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Your facility may be exempted from the program if you can show that no pollutants are exposed to storm water runoff, and if your facility meets the criteria described in Section A of the attached survey.

If you are unsure whether these requirements apply to your facility or would like to discuss them with a representative of the Department, feel free to attend an information session. Sessions will be offered on: June 12th afternoon, starting at 1:00 p.m. and June 14th morning, starting at 9:00 a.m. in Room A/B of the Department's Northwest Regional office, located at 2020 Southwest Fourth Avenue, Suite 400, Portland.

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FACILITY SURVEY

If your facility is located in one of the following six counties: Clackamas, Clatsop, Columbia, Multnomah, Tillamook, or Washington, you will need to complete and return this survey. Please complete the Facility Information section, along with either the A or B section below, fold, stamp, staple, and return by May 31, 1996. Please type or print clearly. Feel free to attach additional sheets, if necessary.

Facility Information:

Facility Name: _____

Address: _____

_____

Contact Person: _____

Phone Number: _____

SIC Code: _____

A. I do not believe that the activities at my facility require a storm water permit:
(check one of the boxes)

☐ 1) The processing and storage of all materials (raw, intermediate and final products) takes place under cover, never exposed to storm water.

☐ 2) There is no storm water runoff into drains or ditches from this facility.

☐ 3) Other (please explain): _____

B. I believe that I need a storm water permit and would like to apply:

☐ Please send an application packet to me at the above address.

Signature:_____ **Date:**_____

Note : If you are not sure you need a permit, you may obtain additional information by attending one of the following information session:
June 12th afternoon, starting at 1:00 p.m. and June 14th morning, starting at 9:00 a.m. at the Department's Northwest Regional Office, 2020 SW 4th Ave., Suite 400, Room A/B, Portland, Oregon.

Postage
Required

Binhong Wu
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201-4987

Tim Todd –
I'm not
aware of any
requirement on
Lasco – our ship
company. Pls fill
out
TM

May 8, 1996

Storm Water Pollution Control Permit Program

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We understand that some facility owners may not be aware of the permitting process, so we are allowing a grace period when permits will be issued without enforcement actions being taken. For the facilities requesting storm water permits, the grace period will extend through the application and permitting period. Please complete the attached survey form and return it to the Department before May 31, 1996.

Your facility may be exempted from the program if you can show that no pollutants are exposed to storm water runoff, and if your facility meets the criteria described in Section A of the attached survey.

If you are unsure whether these requirements apply to your facility or would like to discuss them with a representative of the Department, feel free to attend an information session. Sessions will be offered on: June 12th afternoon, starting at 1:00 p.m. and June 14th morning, starting at 9:00 a.m. in Room A/B of the Department's Northwest Regional office, located at 2020 Southwest Fourth Avenue, Suite 400, Portland.

The Department appreciates your prompt action and cooperation in this matter. If you have any questions, please feel free to contact Binhong Wu at (503) 229-5160.

FACILITY SURVEY

If your facility is located in one of the following six counties: Clackamas, Clatsop, Columbia, Multnomah, Tillamook, or Washington, you will need to complete and return this survey. Please complete the Facility Information section, along with either the A or B section below, fold, stamp, staple, and return by May 31, 1996. Please type or print clearly. Feel free to attach additional sheets, if necessary.

Facility Information:

Facility Name: Lasco Shipping Company
Address: 3200 NW Yeon, PO Box 10047
Portland, OR 97210
Contact Person: Tim Todd
Phone Number: 503/286-6944
SIC Code: 8611

A. I do not believe that the activities at my facility require a storm water permit:
(check one of the boxes)

☒ 1) The processing and storage of all materials (raw, intermediate and final products) takes place under cover, never exposed to storm water. Facility is an office building.

☐ 2) There is no storm water runoff into drains or ditches from this facility.

☐ 3) Other (please explain): _____

B. I believe that I need a storm water permit and would like to apply:

☐ Please send an application packet to me at the above address.

Signature: Timothy R. Todd **Date:** 5/15/96

Note : If you are not sure you need a permit, you may obtain additional information by attending one of the following information session:
June 12th afternoon, starting at 1:00 p.m. and June 14th morning, starting at 9:00 a.m. at the Department's Northwest Regional Office, 2020 SW 4th Ave., Suite 400, Room A/B, Portland, Oregon.

FOR WATER RESOURCES DEPARTMENT USE ONLY

Date Postmarked _____ W93582

Date Hand-delivered _____ WRD Receipt _____

Watermaster Initials _____ Date Fee Received _____

Check No. _____

START CARD

NOTICE OF BEGINNING OF WELL CONSTRUCTION

(as required by ORS 537.762)

This form must be completed, signed by both the owner (or authorized agent) and constructor, and the original mailed or delivered to the Water Resources Department, 158 12th St. NE, Salem, OR 97310, no later than the day construction, alteration, conversion or abandonment work begins. A $75 fee shall accompany all notices for new well construction or conversion of an existing hole not previously used to obtain water (make checks payable to the Water Resources Department). Notices meeting this requirement but received without the required fee will not be accepted as properly and timely filed. In addition, the constructor shall provide the "Watermaster Copy" of this notice to the office of the district watermaster within which the well is being constructed, altered, converted or abandoned using one of the following options: (a) by regular mail no later than three (3) calendar days (72 hours) prior to commencement of work; or, (b) by hand delivery, during regular office hours, no later than the day work is commenced; or, (c) by FAX no later than the day work is commenced. If method (c) is used, the original "Watermaster copy" of this notice shall also be mailed or delivered to the office of the district watermaster no later than the day work is commenced. The Water Resources Commission has authority to impose civil penalties for failure to submit the required $75 fee with the start card and for failure to submit cards prior to beginning any construction, alteration, conversion or abandonment work.

Owner's name and mailing address: Schnitzer Steel Co.

3200 NW 44th

Phone: Portland, OR 97210

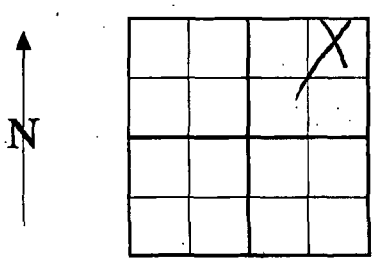
Check type of work: Fee Required { ☐ New construction ☐ Conversion } No Fee Required { ☐ Alteration (Repair/Recondition) ☐ Deepening ☒ Abandonment } Original Start Card Number _____

Proposed Commencement Date 9/3/96 Existing or Proposed Well Depth 30 Diameter Piezo

Check Use: ☐ Domestic ☐ Public System (Community) ☐ Industrial ☐ Irrigation ☒ Monitoring ☐ Thermal ☐ Injection ☐ Other _____

Proposed Well Location: County Multnomah Owner's Well Id. No. _____

Township 2 (N or S) Range 1 (E or W) Section 35



1. NE 1/4 of NE 1/4 of above section
2. Street address of well location 12805 N. Burgard Rd. Portland, OR.
3. Tax lot number of well location _____
4. Attach map with location identified. See reverse of this form for approved maps.
5. Show well location within 1/4, 1/4 of section grid at left.

We hereby certify that we have read the back of this form and that the information provided is accurate to the best of our knowledge.

G. McIlwis License No. 1011 Company Geotech

Bonded Water/Monitor Well Constructor

_____

Owner

NOTE: This is not a water right application. The owner is responsible for obtaining a water right through the Water Resources Department, if required. The Oregon Health Division requires plans to be submitted and approved prior to construction if the well is to be used as a public system.

THIS COPY TO CUSTOMER

SCHN00246063

The business or activity of constructing new wells or altering existing wells is declared to be a business or activity affecting the public welfare, health and safety. The Water Resources Commission has been charged with the administration of water rights and use of the ground water resources of the state and the prevention of waste and contamination of all underground waters. This is partly accomplished by the licensing of well constructors and the adoption of rules governing well construction, alteration, abandonment, maintainance and use. Ultimately, the landowner of the property where the well is constructed is responsible for the condition of the well.

Specific requirements for Monitor Wells are detailed in " Construction and Maintainance of Monitoring Wells and Other Holes in Oregon", which is available from the Water Resources Department, 158 12th Street N.E., Salem OR 97310, phone (503) 378-3739.

Specific requirements for Watter Supply Wells are detailed in "Rules and Regulations Prescribing General Standards for the Construction and Maintenance of Water Supply Wells in Oregon," which is available from the Water Resources Department, 158 12th Street N.E., Salem, OR 97310, phone (503) 378-3739.

A public system includes community wells, certain commercial facilities (RV parks, Restaurants, etc.), or 4 or more residences.

The following summarizes major elements of the minimum "Water Supply Well Construction Standards":

1. Licensed and bonded water well constructors and permitted and bonded landowners are responsible for ensuring that all well construction, alteration, abandonment, or conversion work is performed in compliance with Oregon's minimum acceptable standards.
2. The well shall not be located within 50 feet of a septic tank, closed sewage system (city) or confined animal feeding or animal waste storage area. The well shall not be located within 100 feet of a septic drainline or sewage disposal area. The well shall not be located within 500 feet of a hazardous waste storage, disposal or treatment area.
3. The top of the well casing or pitless unit shall extend at least 12 inches above the finished ground surface or pumphouse floor.
4. On new well construction, generally a minimum 18-foot-deep upper drillhole must be constructed. The upper drillhole is to be a minimum of 2 to 4 inches larger in diameter than the well casing depending on the grouting method used. A grout seal must be placed in the annular space. Approved grout material is neat cement or, under special circumstances, dry granular bentonite. Generally a 6-inch well casing sealed to a depth of 18 feet with an annular space of 2 inches will require a minimum of 2 sacks of neat cement, and a 4-inch annular space will require a minimum of 5 sacks of neat cement. If the sealing interval is doubled, the minimum amount of cement will also be doubled. Additional casing and sealing depths are required where geologic conditions necessitate. Additional standards apply to artesian wells.
5. A well report (well log) shall be prepared by the constructor for each well constructed, converted, altered or abandoned. In addition to other information, the log shall accurately reflect the well's final location. A copy of the log shall be filed with the Water Resources Department within 30 days after completion of construction.
6. The landowner shall maintain all wells in a condition whereby they are not a hazard to life or property nor a source of contamination to the ground water supply.
7. The well shall be equipped with a usable access port with a minimum diameter of 1/2-inch. If an airline is installed, it must enter the well in a location other than the access port. If the well constructor does not install a pump in the well, the landowner will be required to provide the access port.

Maps submitted must have the following:

a) map publisher
b) map title
c) date of the map's revision/update
d) scale

Maps available include the following:

1) The United States Department of the Interior, Geologic Survey 7.5 minute series (topographic); 15 minute series will be accepted if a 7.5 minute series has not been printed for the area within the last five years. These maps are available at bookstores, office supply stores, and government agencies.
2) Cadastral maps, 81/2 X 11, in the most detailed scale available, that have been printed in the last five years. These maps are available at the Department of Revenue, county offices (tax assessor), and sometimes through title insurance companies, real estate agents and/or the landowner.

STATE OF OREGON

MONITORING WELL REPORT

(as required by ORS 537.765 & OAR 690-240-095)

Instructions for completing this report are on the last page of this form.

Start Card # 93582

(1) OWNER/PROJECT: WELL NO. B-1

Name Schnitzer Steel Prod. Co.

Address 3200 NW Yeon

City Port State OR Zip 97210

(2) TYPE OF WORK:

- [ ] New construction
- [ ] Alteration (Repair/Recondition)
- [ ] Conversion
- [ ] Deepening
- [x] Abandonment

(3) DRILLING METHOD

- [ ] Rotary Air
- [ ] Rotary Mud
- [ ] Cable
- [x] Hollow Stem Auger
- [ ] Other

(6) LOCATION OF WELL By legal description

Well Location: County Mult

Township 2N (N or S) Range 1W (E or W) Section 35

1. NE 1/4 of NE 1/4 of above section.

2. Either Street address of well location 12005 N. Burgard Rd Ptld OR

or Tax lot number of well location 71

3. ATTACH MAP WITH LOCATION IDENTIFIED. Map shall include approximate scale and north arrow.

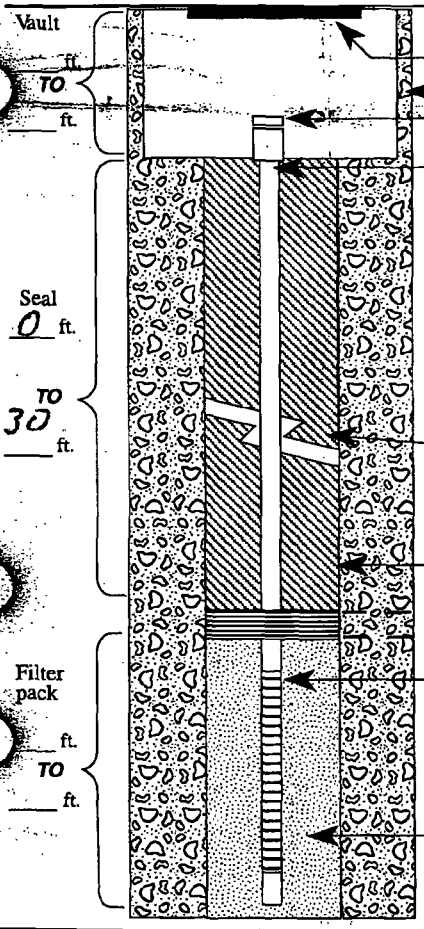
(7) STATIC WATER LEVEL:

_____ Ft. below land surface. Date _____

Artesian Pressure _____ lb/sq. in. Date _____

(4) BORE HOLE CONSTRUCTION

Special Standards Yes [ ] No [x] Depth of completed well 30' ft.



Casing diameter _____ in.

material _____

Welded [ ] Threaded [ ] Glued [ ]

Liner diameter _____ in.

material _____

Welded [ ] Threaded [ ] Glued [ ]

Well seal:

Material _____

Amount _____

Grout weight _____

Borehole diameter _____ in.

Bentonite plug at least 3 ft. thick

Screen material _____

interval(s):

From _____ To _____

From _____ To _____

Slot size _____ in.

Filter pack:

Material _____

Size _____ in.

(8) WATER BEARING ZONES:

Depth at which water was first found _____

From	To	Est. Flow Rate	SWL

(9) WELL LOG: Ground elevation _____

Material	From	To	SWL
abandoned well by drilling over PVC & removing screen and filling hole bottom up (threw auger)			

Date started 2/5/96 Completed 2/5/96

(unbonded) Monitor Well Constructor Certification:

I certify that the work I performed on the construction, alteration, or abandonment of this well is in compliance with Oregon well construction standards. Materials used and information reported above are true to the best knowledge and belief.

MWC Number 1031G

Signed [signature] Date 2/5/96

(bonded) Monitor Well Constructor Certification:

I accept responsibility for the construction, alteration, or abandonment work performed on this well during the construction dates reported above. All work performed during this time is in compliance with Oregon well construction standards. This report is true to the best of my knowledge and belief.

MWC Number _____

Signed [signature] Date 9/3/96

(5) WELL TEST:

- [ ] Pump
- [ ] Bailer
- [ ] Air
- [ ] Flowing Artesian

Permeability _____ Yield _____ GPM

Conductivity _____ PH _____

Temperature of water _____ °F/C Depth artesian flow found _____ ft.

Was water analysis done? [ ] Yes [ ] No

By whom? _____

Depth of strata to be analyzed. From _____ ft. to _____ ft.

Remarks: _____

Name of supervising Geologist/Engineer _____

ORIGINAL & FIRST COPY-WATER RESOURCES DEPARTMENT SECOND COPY-CONSTRUCTOR THIRD COPY-CUSTOMER

SCHN00246065

INSTRUCTIONS FOR MONITORING WELL REPORT

Complete each numbered item as appropriate.

(1) Owner: Enter owner/project name and address as completely as possible

(2) Type of work: Check one
Describe alteration or abandonment procedures under Item 9.

(3) Drill methods: Mark the correct box: rotary air, rotary mud, cable, hollow stem auger, or other.

(4) Borehole construction: Indicate depth of completed well.
If special standards were used, mark the date approval was received from the Water Resources Department.
For full descriptions of seal methods see OAR 690-240-130 of Rules and Regulations Prescribing General Standards for the Construction and Maintenance of Monitoring Wells in Oregon.
Casing liner: Describe type of casing and liner and the locations.
Screens: Describe type of screen and the locations.
Complete all blanks as appropriate. If information requested is not applicable indicate with (N/A) or line through.

(5) Well Tests: Mark the type of test that was used to determine the quantity of water available from the well. Indicate the temperatures of water strata found, and the depths at which artesian flows were found. If a chemical or biological water analysis was done, show who performed the test.

(6) Location of Well:
Indicate the location of the well as accurately as possible so that it can be located by other parties in the future. County, Township, Range, Section, 1/4 1/4, and either street address or Tax Lot number . If LORAN equipment is available, please report latitude and longitude in degrees, minutes and seconds.

Attach a site map to this Monitoring Well Report. Map shall include an approximate scale and north arrow.

(7) Static Water Level: Show the static water level of the completed well. Indicate artesian pressure, if appropriate.

(8) Water Bearing Zones: Indicate the depth at which water was first found. Show the water bearing strata in the position of the static water levels (SWL). Include an estimate of flow rate, if possible.

(9) Well Log: Show the approximate beginning ground elevation above mean sea level. This information may be determined from county topographical maps if available. Describe the color, texture, grain size, and structure of materials and show the thickness of each stratum and aquifer drilled. There should be at least one entry for each change of formation.

Mark the dates and sign as appropriate at the bottom of the from.

The original and 1st copy of this report must be filed with the Water Resources Department, 3850 Portland Rd. N.E., Salem, OR 97310 within 30 days from the date of well construction, alteration or abandonmen t.he 2nd copy is for the Well Constructor, the third copy is for the Landowner.

ACUMEM

NWW Acumem Inc
2724 Loker Ave. West
Carlsbad, CA 92008, USA
Telephone 619-929-7500
Fax 619-929-7510

December 18, 1995

Schnitzer Steel Inc.
3200 NW Yeon Ave.
Box 10047
Portland, Oregon 97210

Attn.: Tim Todd

Re: Ultimem 500 series oil/water separation system

Dear Tim,

Following our meeting at your facility on Friday December 15 regarding your scrap metal wash down wastewater, I am pleased to confirm budget pricing for an Ultimem 500 series system. The OWS system will be designed to reduce the oil concentration of the sump water to below 10 ppm enabling you to reduce the flow demand on the present clarifier.

The budget proposal and system description outlined is for an OWS 510 designed to treat up to 2,500 GPD. Alternatively, you may wish to consider an OWS 520 which would treat 5,000 GPD. I have provided budget pricing for each for your consideration.

Acumem recommends a 2-4 week pilot evaluation prior to the acquisition of a full scale system in order to both provide you with confidence in the technology as well as to optimize final system operating parameters. I have included a rental agreement for the OWS 501 system capable of treating 250 GPD.

Tim, as we discussed, it would be appropriate for you to prepare a draft flow diagram of your current waste treatment facility and to do some simple mass balances for water flows considering both the 510 and 520 systems and the impact on the present clarifier. Please let me know if we can be of assistance in this effort.

Please feel free to contact me should you have any questions or require further assistance. We look forward to being of service to you.

Sincerely,

Mark Lambert
Vice President

Ultimem™ OWS-501 System

D. Equipment Detail

The equipment supplied under the scope of this quotation includes, but is not limited to the following:

MAIN EQUIPMENT
- Process skid - stainless steel frame includes electrical panel, Backwash pump timer, process feed tank, backwash feed tank.
- Recirculation pump - Centrifugal.
- Backwash pump - Centrifugal.
- Optimem™ MF02010P 1.0m^2 Microfiltration Membrane module.

INSTRUMENTS AND CONTROL
- Instrumentation - analog pressure gauge, permeate rotameter.
- Control Panel - 110 Volts \ Single phase.

DIMENSIONS AND WEIGHT
- 36"(l) x 24"(w) x 48"(h)
- 120 pounds (dry)

SERVICES REQUIRED
- Level indoor space recommended.
- Customer connections - to feed tank, permeate line, concentrate removal.
- Electrical - 110 VAC, 60 Hz, single phase

Equipment not included in this quotation includes, but is not limited to the following:

- Concentrate, or other product tanks, piping associated with customer supplied hook ups.
- Temperature control of feed stream. Feed stream not to exceed 120 degrees F.
- Electrical power and supply.

E. Membrane

One membrane module will be provided with the OWS-501 system. Acumem warrants that the module will be free of mechanical defects, as determined by Acumem, due to faulty materials or errors in manufacturing workmanship for a period of up to twelve months after initial operation. Acumem will repair or replace, at no charge, any module which is found to be mechanically defective. Warranty of membrane will be void in the occurrence of physical or chemical abuse of the membrane modules. Membrane performance will be warranted against catastrophic failure as determined by Acumem.

Rental Proposal For
Ultimem™ OWS-501 System

A. General System Description

The Ultimem™ OWS-501 System is intended for treatment of various oily wastewater streams on the customer's site. The Ultimem OWS-501 membrane system provide an uncomplicated and dependable solution to oil-in-water emulsion separations. Based on Acumem's chemically resistant Optimem Microfiltration membranes, this self-contained unit is nominally rated to process 250 gallons/day. Actual productivity will depend upon the nature of the feed stream.

B. Pricing

The Ultimem™ System is quoted as specified in the Equipment Detail section of this document.

The equipment rental Price schedule is as follows:

- **$1000.00 U.S.** (One Thousand Dollars U.S.) for first week (7 day period) equipment rental fee. The first week rental fee includes 3 days associated start up costs such as on-site installation and commissioning support, or on-site training.

- **$500.00 U.S.** (Five Hundred Dollars U.S.) for each additional week (7 day period) equipment rental fee. Second and subsequent week rental fees do not include on site technical support. Additional on site support may be purchased at **$500.00 U.S.** per day plus travel and related expenses.

Minimun rental period is 2 weeks. Seventy percent (70%) of the rental fee may be credited to future equipment purchase.

Replacement Optimem™ MF02010P, 1.0m^2 Microfiltration Membrane elements may be purchased at **$745.00 U.S.** (Seven Hundred and Forty Five Dollars U.S.) per element.

C. Delivery

Shipment of the equipment is F.O.B. Carlsbad, California and is currently estimated at three to five weeks after receipt of order.

Pricing

The total net budget price for the equipment quoted in this proposal is .....$30,000.
F.O.B. Carlsbad, CA.

Budget pricing for the OWS 520 system is .....$42,000.

Terms: 20% upon order
70% upon shipment
10% Net 30 days
(All the above upon approval)

Ship date: 8-10 weeks from order
Price subject to change after 90 days.

ULTIMEM OWS-510 specifications:

Main equipment

Frame	Painted mild steel
Wash tank	Polypropylene
Backflush tank	Polypropylene
Feed pump	Single stage centrifugal - 304ss
Backwash pump	Single stage centrifugal - 304ss
Pre-filter	100 micron nominal bag filters operated in parallel
Membrane module	1 R100 Optimem microfiltration module, 0.2 micron pore size, 10 m^2 ($100ft^2$) membrane area
Feed flow	Low flow switch
Permeate flow	Variable area flowmeter and flow switch
Pressure gauges	5 Bourdon type gauges

Electrical equipment

Control panel Housed in Nema 4 enclosure with
- system running light
- low flow trip light
- high pressure trip light
- cleaning cycle on light
- isolation switch
- pump start switch
- feed flowrate indicator

Control Panel PLC controller 440v three phase, 25 amps per phase

Pipework and valves

Feed pipework 3 inch PVC manifold, 2.5 inch lines to each module
Permeate Pipe 1.5 inch

Dimensions and weight

Dimensions	156"(L) x 78" (W) x 60" (H)
Weight	3,500 lbs approximate dry weight

Nominal capacity

2,500 GPD

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

Spokane Industries	Client Project ID:	Schnitzer	Sampled:	Mar 27, 1996
P.O. Box 3303	Sample Matrix:	Water	Received:	Mar 29, 1996
Spokane, WA 99220	Analysis Method:	EPA 413.2 (I.R.)	Extracted:	Apr 3, 1996
Attention: Bill Petty	First Sample #:	B603572-01	Analyzed:	Apr 4, 1996
			Reported:	Apr 8, 1996

TOTAL OIL & GREASE

Sample Number	Sample Description	Sample Result mg/L (ppm)
B603572-01	UNTREATED	260
B603572-02	1308,1200,AM26	19
BLK040396	Method Blank	N.D.

Reporting Limit:	1.0

Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH CREEK ANALYTICAL Inc.

David Vandel
Project Manager

603572.SPK <2>

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

Spokane Industries	Client Project ID:	Schnitzer	Sampled:	Mar 27, 1996
P.O. Box 3303	Sample Descript:	1308,1300,AM26	Received:	Mar 29, 1996
Spokane, WA 99220	Analysis Method:	EPA 6010/7000	Digested:	Apr 1, 1996
Attention: Bill Petty	Sample Number:	B603572-02	Analyzed:	Apr 3-5, 1996
	Sample Matrix:	Water	Reported:	Apr 8, 1996

E.P.A. PRIORITY METALS

Analyte	EPA Method	Reporting Limit µg/L (ppb)	Sample Results µg/L (ppb)
Antimony	6010	100	N.D.
Arsenic	7060	4.0	N.D.
Beryllium	6010	5.0	N.D.
Cadmium	**6010**	**5.0**	**13**
Chromium	6010	10	N.D.
Copper	6010	30	N.D.
Lead	**7421**	**2.0**	**69**
Mercury	7470 Modified	1.0	N.D.
Nickel	6010	30	N.D.
Selenium	7740	5.0	N.D.
Silver	7760	20	N.D.
Thallium	6010	200	N.D.
Zinc	**6010**	**20**	**390**

Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH CREEK ANALYTICAL Inc.

David Vandel
Project Manager

603572.SPK <5>

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

BOTHELL ■ (206) 481-9200 ■ FAX 485-2992
SPOKANE ■ (509) 924-9200 ■ FAX 924-9290
PORTLAND ■ (503) 643-9200 ■ FAX 644-2202

Spokane Industries	Client Project ID:	Schnitzer	Sampled:	Mar 27, 1996
P.O. Box 3303	Sample Descript:	UNTREATED	Received:	Mar 29, 1996
Spokane, WA 99220	Analysis Method:	EPA 6010/7000	Digested:	Apr 1, 1996
Attention: Bill Petty	Sample Number:	B603572-01	Analyzed:	Apr 3-5, 1996
	Sample Matrix:	Water	Reported:	Apr 8, 1996

E.P.A. PRIORITY METALS

Analyte	EPA Method	Reporting Limit µg/L (ppb)	Sample Results µg/L (ppb)
Antimony	6010	100	160
Arsenic	7060	4.0	29
Beryllium	6010	5.0	N.D.
Cadmium	6010	5.0	190
Chromium	6010	10	210
Copper	6010	30	1,300
Lead	7421	2.0	3,700
Mercury	7470 Modified	1.0	12
Nickel	6010	30	400
Selenium	7740	5.0	N.D.
Silver	7780	20	N.D.
Thallium	6010	200	N.D.
Zinc	6010	20	32,000

Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH CREEK ANALYTICAL Inc.

David Vandel
Project Manager

603572.SPK <4>

FLOW PRODUCTS INCORPORATED

DATE: March 20, 1996

TO: **Schnitzer Steel Industries**

ATTN: Tim Todd

FROM: John Leonard

RE: Belt Skimmer

Regarding the above noted subject, for your oil recovery application we propose to supply the following:

1 ea DBI Dyna-Belt model DB6-4 Belt Skimmer complete with tail pulley
and polypropylene belt (4x219)
Package Price, F.O.B. Dallas TX: **$1100.00**

If the conditions in your sump/separator are turbulent we highly recommend a lower pulley stabilizing frame be used. Your additional cost: **$450.00**

The unit quoted above is designed to extend down approximately 3' below grade into oily water while mounted on a customer fabricated frame that will allow for discharge into a 55 gal drum.

On the subject of ISO-9000, Versa-Matic went after this certification because they felt the quality assurance process associated with it would be of benefit when dealing with very large national and international corporations. They feel it has helped and don't regret the decision.

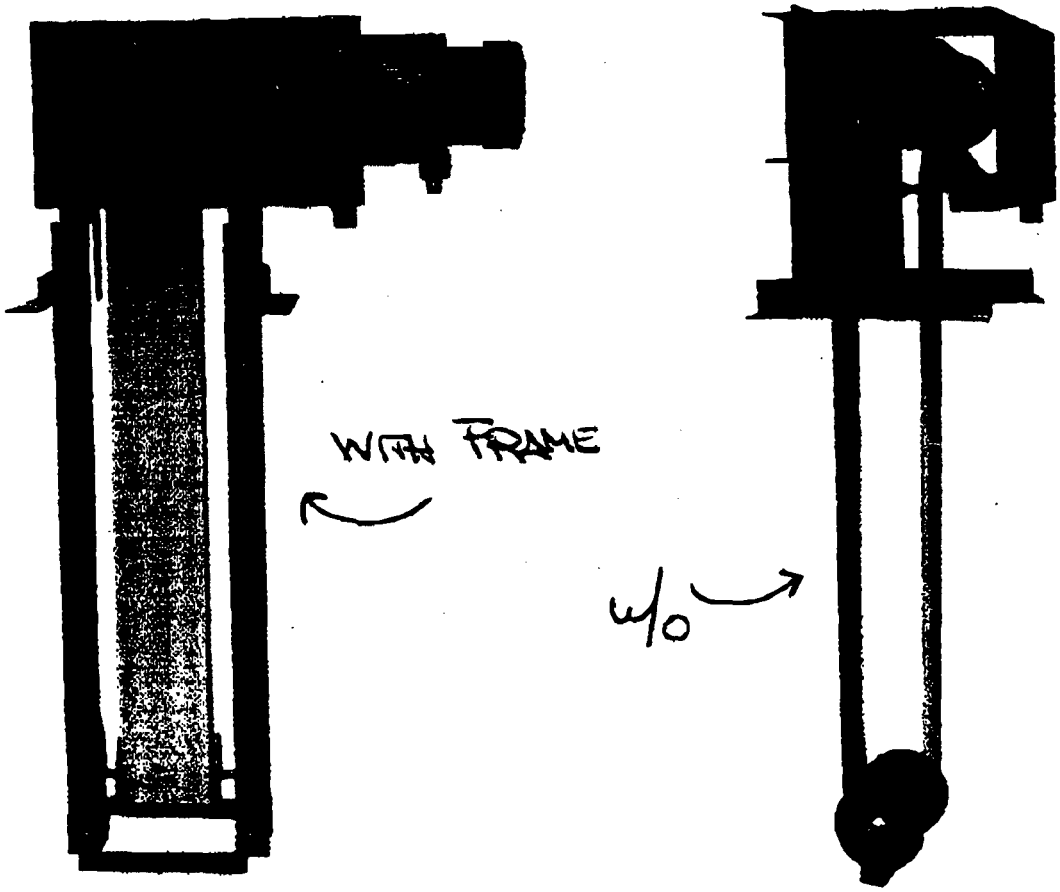
Thank you for the opportunity to provide you with this proposal. If you have any questions or concerns regarding its contents, don't hesitate to call.

Sincerely,

P.O. Box 537 Kent, WA 98035-0537
ph - 206-872-0227 fax - 206-872-0229 fax - 1-800-285-3193

DYNA-BELT

BELT-TYPE OIL-SKIMMER



REMOVES TRAMP-OIL FROM WATER-BASED FLUIDS FROM VIRTUALLY ANY DEPTH, QUICKLY, THOROUGHLY, ECONOMICALLY!

- **Easy to Install:** Mounts securely to tank in minutes.
- **Easy to Operate:** Once the DYNA-BELT is set-up, all you have to do is empty the disposal drum.
- **Minimal Maintenance:** Self-aligning and self-compensating design.
- **Durable Construction:** All heavy-duty industrial components for long service-life.
- **Versatile in Application:** Many belt-widths, belt-materials, and belt-reaches to suit.

U.S. Department of Transportation

United States Coast Guard

NOTICE OF FEDERAL INTEREST FOR AN OIL POLLUTION INCIDENT

COMMANDING OFFICER

PORT OPERATIONS
USCG MARINE SAFETY OFFICE
6767 N. BASIN AVENUE
PORTLAND, OR 97217-3992

TIM TODD

ENVIRONMENTAL ADMINISTRATOR
SCHNITIZER STEEL
12005 N. BURGVARD RD
PORTLAND, OR ~~97203~~ 97210

09 JULY 97

Gentlemen:

On or about 0630 09 JULY 97, an oil pollution incident occurred or threatens to occur at SCHNITIZER STEEL PORTLAND, OR. You may be financially responsible for that incident. Under Federal Statutes, the United States Government may take action to minimize or mitigate damage to the public health or welfare that is threatened or that may be caused by this incident.

Under the Oil Pollution Act of 1990, the responsible party is liable for, among other things, removal costs and damages resulting from this incident. The failure or refusal of the responsible party to provide all reasonable cooperation and assistance requested by the Federal On-Scene Coordinator (OSC) will eliminate any defense or entitlement to limited liability which otherwise might be available under the Act.

You are advised that your failure to properly carry out the removal of the discharge as ordered by the OSC or to comply with any administrative orders necessary to protect the public health and welfare, may subject you to additional penalties. For such failure, owners, operators, or persons in charge of the vessel or facility from which the oil is discharged are subject under the Federal Water Pollution Control Act (FWPCA), as amended, to a civil penalty of up to $25,000 per day of violation or up to 3 times the costs incurred by the Oil Spill Liability Trust Fund. Should you require further information concerning this matter, please contact BM3 CRAIG VERMEULEN at the above address and telephone number.

As long as the OSC determines that you are taking adequate actions in this matter, Federal removal action will usually be limited to monitoring the progress of your actions and providing guidance as necessary. Under the FWPCA, as amended, your response actions may be taken into account in determining the amount of any penalty assessed as a result of the discharge.

Sincerely,

Craig Vermeulen

Received and Acknowledged: _____

Witness(es): _____

_____

MEMORANDUM

To: File

From: Tim Todd

Date: July 21, 1997

Subject: July 9, 1997, Car Fire - International Terminals

On 9, 1997, at approximately 3:00 a.m., a stack of crushed car bodies near the railroad tracks just west of the plate shop building caught fire. IT personnel reported the fire to the Portland Fire Bureau immediately after it was discovered. As PFB responded, the fire spread to adjacent stacks of car bodies. The fire was eventually extinguished with water pumped from the river by the PFB fireboat.

IT personnel covered all storm water catchbasins in the vicinity of the fire to prevent suppression water, which accumulated in the drainage basin to the north of the shredder, from entering the river. Accumulated fire suppression water was pumped by IT crews into the process water tanks for use within the shredder system. IT crews placed straw bales around all catchbasins as an added precaution to prevent burn products from entering the river. Oil sorbent pads and booms were also deployed to reduce the potential for oil to enter the storm drainage system. At the request of the U.S. Coast Guard, 2 sections of oil containment boom were deployed on the river near storm water outfalls that may have been affected.

Because USCG staff noted a slight oil sheen on the river near the facility, SSI notified the NRC (report #394369) and OERS (incident #97-1781) of the fire at approximately 10:00 a.m. on July 9, 1997. Ed Wilson of DEQ called to inquire regarding the status of the fire, I briefed him. He expressed concern that burn products could enter the water with suppression water. I described our precautions, he seemed satisfied with our efforts, but suggested that I contact Ranei Nomura of DEQ to inquire about possible violations of our storm water discharge permit if suppression water were to leave the site. I called Ms. Nomura, she said that no violation would occur if a discharge of suppression water had occurred, since fire suppression water is excluded from discharge regulations (see attached email).

On July 10, 1997, Spencer Environmental vacuumed all debris out of storm water catchbasins that may have been impacted by suppression water. All solid debris was swept up from areas where fire suppression water had ponded.

On July 11, 1997, Paul Keiran of DEQ's Water Quality Division visited IT to review procedures used to mitigate potential impacts to surface water. Mr. Keiran indicated that he was satisfied with SSP's efforts.

2003/2004

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
1	12/5/2003	7.48	61	7.4	0.086	0.095	0.550
	5/8/2004	7.01	16	6.7	0.086	0.160	0.400
3	12/5/2003	8.12	22	ND	0.099	0.048	0.669
	5/8/2004	7.67	8	3.2	0.026	0.064	0.240
4	12/5/2003	7.45	ND	ND	0.023	0.003	0.070
	5/8/2004	7.85	4	2.3	0.039	ND	0.035
5	12/5/2003	8.04	12	5.3	0.032	0.023	0.098
	5/8/2004	7.88	8	2.6	0.024	0.036	0.086
6A	12/5/2004	7.37	27	ND	0.012	0.014	0.061
	5/8/2004	7.56	9	ND	0.006	0.037	0.016
14	12/5/2003	7.98	8	ND	0.011	0.025	0.107
15	5/8/2004	7.68	240	8.9	0.190	0.354	0.660
16	12/5/2003	8.03	23	ND	0.029	0.042	0.175
	5/8/2004	8.11	64	3.7	0.150	0.183	0.360
20	12/5/2003	7.86	6	ND	ND	0.002	0.013
	5/8/2004	8.01	32	3.6	0.018	0.025	0.100
Notes:		6-9	130mg/L	10/mg/L	0.1mg/L	0.4mg/L	0.6mg/L

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

2001 / 2002

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
2	10/30/2001	7.04	14	5.0	0.081	0.153	1.040
	5/22/2002	7.22	13	13.0	0.170	0.024	0.268
3	10/30/2001	7.19	10	5.0	0.099	0.070	0.252
	5/22/2002	7.38	11	ND	0.019	ND	0.076
4	10/30/2001	7.94	ND	ND	0.045	0.014	0.040
	5/22/2002	NA	NA	NA	NA	NA	NA
5&6	10/30/2001	7.76	10	ND	0.027	0.028	0.082
	5/22/2002	7.91	ND	ND	0.013	ND	0.015
7	10/30/2001	8.10	36	ND	0.034	0.059	0.231
	5/22/2002	8.42	59	ND	0.025	0.016	0.106
14	10/30/2001	7.67	156	ND	0.193	0.286	1.230
17	5/22/2002	7.09	73	7.1	0.144	0.164	0.654
20	10/30/2001	8.23	28	ND	0.018	0.028	0.057
Notes:		6-9	130mg/L	10mg/L	0.1mg/L	0.4mg/L	0.6mg/L

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

2006/2007 Results

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
1*	11/30/2006	7.92	320	12.5	0.16	0.375	1.5
6	11/30/2006	7.80	5.0	7.4	0.005	0.023	0.045
	5/20/2007	7.62	48	3.0	0.007	ND	0.072
13	11/30/2006	8.98	190	6.9	0.11	0.177	0.61
	5/20/2007	7.46	15.0	3.5	0.047	0.040	0.20
14	11/30/2006	8.85	150.0	2.3	0.13	0.255	0.74
	5/20/2007	7.88	48.0	6.2	0.011	ND	0.035
20	11/30/2006	7.23	53	ND	ND	0.056	0.06
	5/20/2007	7.31	8.00	ND	0.048	0.017	0.21
		5.5-9.0	130	10	0.1	0.4	0.6

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field and in laboratory. Lab data presented in table.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

*Outfall #1 system pumps were turned on for sampling purposes because previous agency comments required samples be collected from the offline system.

2005/2006

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
3	11/25/2005	7.98	50	5.9	0.18	0.223	2.7
	3/16/2006	7.08	170.0	14.4	0.27	0.710	10
4	11/25/2005	6.96	10	3.0	0.034	ND	0.075
	3/16/2005	7.82	10	6.1	0.13	0.071	0.26
5	11/25/2006	7.01	6.3	ND	0.007	0.023	0.098
	3/16/2005	7.73	5.0	ND	0.007	0.005	0.022
6	11/25/2005	8.10	9.3	ND	ND	ND	0.004
	3/16/2006	8.84	ND	ND	ND	ND	ND
14	11/25/2005	7.99	ND	ND	ND	ND	0.038
15	11/25/2005	6.91	40	ND	0.075	0.074	0.21
	3/16/2006	9.01	210	3.4	0.14	0.243	0.57
16	3/16/2006	9.39	92	ND	0.10	0.224	0.72
20	11/25/2005	7.86	3.0	ND	ND	ND	0.006
	3/16/2006	8.12	160.0	2.5	0.034	0.074	0.22
Notes:		6-9	130mg/L	10mg/L	0.1mg/L	0.4mg/L	0.6mg/L

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field and in laboratory for 3/16/06 samples.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

2004/2005

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
1	12/13/2004	7.29	280	11.2	0.20	0.691	2.2
	3/26/2005	7.02	4.0	3.7	0.063	0.114	0.58
3	12/13/2004	7.21	130	9.6	0.23	0.398	2.3
	3/26/2005	6.81	12	ND	0.066	0.119	0.61
4	12/13/2004	6.76	48	3.1	0.12	0.210	0.49
	3/26/2005	7.13	21	ND	0.055	0.084	0.90
5	12/13/2004	7.05	100	4.4	0.17	0.401	0.92
	3/26/2005	7.01	60	ND	0.093	0.217	0.59
6	12/13/2004	7.55	14	ND	0.023	0.040	0.10
	3/26/2005	7.58	26	ND	0.008	0.019	0.034
14	12/13/2004	7.71	15	2.4	0.037	0.066	0.19
15	3/26/2005	8.10	34	6.0	0.058	0.086	0.17
16	12/13/2004	7.45	12	2.0	0.033	0.019	0.20
	3/26/2005	7.93	5.0	ND	0.026	0.054	0.29
20	12/13/2004	7.38	18	ND	0.009	ND	0.028
	3/26/2005	7.92	8.0	ND	0.019	0.027	0.29
Notes:		6-9	130mg/L	10mg/L	0.1mg/L	0.4mg/L	0.6mg/L

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

Oregon
John A. Kitzhaber, M.D., Governor

Department of Environmental Quality
Northwest Region
2020 SW Fourth Avenue
Suite 400
Portland, OR 97201-4987
(503) 229-5263 Voice
TTY (503) 229-5471

October 10, 2002

RE: Renewed NPDES 1200-Z Storm Water Permit

Enclosed is your copy of the recently renewed National Pollutant Discharge Elimination System (NPDES) 1200-Z general storm water discharge permit. It expires on June 30, 2007.

Most of the conditions in the renewed permit are not substantially different from the previous 1200-Z general permit issued in 1997. The most notable changes are the following:

□ **No Exposure Conditional Exclusion**: In 1999 the U.S. Environmental Protection Agency (EPA) adopted "Phase II" of the federal storm water rules. These rules included an exclusion from permit requirements for industrial facilities that can certify that their industrial activities and equipment are not exposed to storm water. Permittees interested in pursuing this exclusion can contact the DEQ regional office to obtain a certification form and guidance materials.

□ **Reinstatement of Monitoring**: The renewed permit clarifies the extent of the monitoring waiver for permittees who demonstrate that their storm water run-off is below the benchmarks in Schedule B for four consecutive monitoring events (Schedule B, Condition 2[c][4]). Specifically, if no monitoring was performed during the previous permit period, the permittee must reinitiate monitoring. Therefore, those permittees who received a monitoring waiver prior to the issuance of the 1997 1200-Z renewal would need to start monitoring again to demonstrate that benchmarks are still being met.

□ **Other Public Agencies Acting as the Department's Agent**: The Department has authorized certain local public agencies (City of Portland and Clean Water Services) to act as its Agent in implementing various aspects of this permit (see Schedule D, Condition 4). Additional agreements may be established with other local agencies over the course of this new permit period to provide these services. In instances where Agent agreements exist, the Department or its Agent will notify the permittee of where to submit monitoring data, plans, no-exposure certifications, and other notifications or correspondence associated with the permit.

If you have any questions about these changes or permit requirements, please call Dennis Jurries, Northwest Region Storm Water Engineer at (503) 229-5937 in our regional office. If you would like to receive the certification form and guidance materials for the "no exposure" conditional exclusion, contact me at (503) 229-5438.

Sincerely,

Annie Hill

Annie Hill
DEQ Regional Permit Coordinator
Northwest Region

SCHN00246118

GENERAL PERMIT
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
STORM WATER DISCHARGE PERMIT

Department of Environmental Quality
811 Southwest Sixth Avenue, Portland, OR 97204
Telephone: (503) 229-5630 or 1-800-452-4011 toll free in Oregon
Issued pursuant to ORS 468B.050 and The Federal Clean Water Act

Issued 10/10/02 GEN12Z MULTNOMAH/NWR
File No. 108103 ORR60-0289

Schnitzer Steel Industries, Inc. dba
Schnitzer Steel Products Co.
12005 N. Burgard Rd.
Portland, OR 97203

SOURCES COVERED BY THIS PERMIT

Facilities identified in 40 Code of Federal Regulation (CFR) §122.26(b)(14)(i - ix, xi) with storm water discharges. See *Table 1: Sources Covered* on p. 2 for more information on the CFR regulated industries covered by this permit. Facilities may qualify for a conditional exclusion from the requirement to obtain coverage under a permit if there is no exposure of industrial activities and materials to storm water pursuant to 40 CFR §122.26(g); see *Permit Coverage and Exclusion from Coverage* on p. 3 for more information.

Construction activities, asphalt mix batch plants, concrete batch plants and Standard Industrial Classification code 14, *Mining and Quarrying of Nonmetallic Minerals, Except Fuels*, are excluded from this permit. These activities are regulated under separate permits.

Michael T. Llewelyn, Administrator
Water Quality Division

Issued: July 26, 2002
Effective: August 9, 2002

PERMITTED ACTIVITIES

Until this permit expires or is modified or revoked, the permittee is authorized to construct, install, modify, or operate storm water treatment and/or control facilities, and to discharge storm water to public waters in conformance with all the requirements, limitations, and conditions set forth in the attached schedules as follows:

		Page
Permit Coverage and Exclusion From Coverage		3
Schedule A -	Storm Water Pollution Control Plan, Additional Requirements, Limitations, and Benchmarks	5
Schedule B -	Monitoring and Reporting Requirements	10
Schedule C -	Compliance Conditions and Schedules	12
Schedule D -	Special Conditions	13
Schedule F -	General Conditions	14

Unless specifically authorized by this permit, by another NPDES or WPCF permit, or by Oregon Administrative Rule, any other direct or indirect discharge to waters of the state is prohibited, including discharges to an underground injection control system.

TABLE 1: SOURCES COVERED

Facilities with the following primary Standard Industrial Classification codes: 10 Metal Mining 12 Coal Mining 13 Oil and Gas Extraction 20 Food and Kindred Products 21 Tobacco Products 22 Textile Mill Products 23 Apparel and Other Finished Products Made From Fabrics and Similar Material 24 Lumber and Wood Products, Except Furniture (excluding 2491 Wood Preserving and 2411 Logging) 25 Furniture and Fixtures 27 Printing, Publishing and Allied Industries 28 Chemicals and Allied Products (excluding 2874 Phosphate Fertilizer Manufacturing) 29 Petroleum Refining and Related Industries 30 Rubber and Miscellaneous Plastics Products 31 Leather and Leather Products 32 Stone, Clay, Glass, and Concrete Products 33 Primary Metal Industries 34 Fabricated Metal Products, Except Machinery and Transportation Equipment 35 Industrial and Commercial Machinery and Computer Equipment 36 Electronic and Other Electrical Equipment and Components, Except Computer Equipment 37 Transportation Equipment 38 Measuring, Analyzing, and Controlling Instruments; Photographic, Medical and Optical Goods; Watches and Clocks 39 Miscellaneous Manufacturing Industries 4221 Farm Product Warehousing and Storage 4222 Refrigerated Warehousing and Storage 4225 General Warehousing and Storage 5015 Motor Vehicle Parts, Used 5093 Scrap and Waste Materials
Facilities with the following primary Standard Industrial Classification codes that have vehicle maintenance shops (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), equipment cleaning operations, or airport deicing operations: 41 Local and Suburban Transit and Interurban Highway Passenger Transportation 42 Motor Freight Transportation and Warehousing (excluding 4221 Farm Product Warehousing and Storage, 4222 Refrigerated Warehousing and Storage, and 4225 General Warehousing and Storage) 43 United States Postal Service 44 Water Transportation 45 Transportation by Air 5171 Petroleum Bulk Stations and Terminals
Steam Electric Power Generation including coal handling sites
Landfills, land application sites and open dumps [excluding landfills regulated by 40 CFR §445 that discharge "contaminated storm water" (as defined by 40 CFR §445.2) to waters of the U.S.]
Hazardous Waste Treatment, Storage and Disposal Facilities [excluding hazardous waste landfills regulated by 40 CFR §445 that discharge "contaminated storm water" (as defined by 40 CFR §445.2) to waters of the U.S.].
Treatment works treating domestic sewage or any other sewage sludge or wastewater treatment device or system, used in the storage, recycling, and reclamation of municipal or domestic sewage (including land dedicated to the disposal of sewage sludge that are located within the confines of the facility) with the design flow capacity of 1.0 mgd or more, or required to have a pretreatment program under 40 CFR §403.

PERMIT COVERAGE AND EXCLUSION FROM COVERAGE

1. **Application for General Permit Coverage**
   a) *New facilities and existing facilities obtaining coverage for the first time*
   Owners or operators of sources covered by this permit must:
      i) Submit a complete copy of the Department-approved application form to the Department requesting coverage under this permit at least 180 days prior to the planned activity that will result in the discharge to waters of the state, unless otherwise approved by the Department.
      ii) Provide payment of all fees applicable to this permit prior to obtaining coverage.

   b) *Renewal of permit coverage for existing permittees*
   Owners or operators of sources covered by this permit must:
      i) Submit a complete copy of the Department approved application form 180 days prior to permit expiration, unless otherwise approved in writing by the Department.
      ii) Provide payment of all applicable fees for permit renewal.
      iii) The existing permit will continue to be in effect through administrative extension after the permit expiration date if a complete renewal application is submitted.

   c) *Notification that permit coverage has been obtained*
      i) The Department will notify the applicant by mail that they have received coverage and is authorized to operate under the conditions of this permit.
      ii) If the applicant's operation cannot be approved for coverage under this permit, the applicant may apply for an individual permit.

2. **"No Exposure" Conditional Exclusion from Permit Coverage**
   Application for permit coverage is not required to obtain the "No Exposure" conditional exclusion described below.
   a) To qualify for this exclusion, the owner or operator must:
      i) Provide a storm resistant shelter to protect industrial materials and activities from exposure to rain, snow, snow melt, and runoff.
      ii) Complete and sign a certification, on a form approved by the Department, that there are no discharges of storm water contaminated by exposure to industrial materials and activities from the entire facility, except as provided in 40 CFR §122.26(g)(2).
      iii) Submit the signed certification to the Department once every five years.
      iv) Allow the Department to inspect the facility to determine compliance with the "no exposure" conditions, and allow the Department to make any "no exposure" inspection reports available to the public upon request.
      v) For facilities that discharge through a municipal separate storm sewer system (MS4), upon request, submit a copy of the "no exposure" certification to the MS4 operator (i.e., local municipality), as well as allow inspection and public reporting by the MS4 operator.
      vi) Use the Environmental Protection Agency (EPA) *Guidance Manual for Conditional Exclusion from Storm Water Permitting Based on "No Exposure" of Industrial Activities to Storm Water* (EPA 833-B-00-001, June 2000) to determine "no exposure."

   b) Limitations for obtaining and/or maintaining the exclusion:
      i) This exclusion is available on a facility-wide basis only, not for individual outfalls. If a facility has some discharges of storm water that would otherwise be "no exposure" discharges, individual permit requirements should be adjusted accordingly.

ii) If circumstances change and industrial materials or activities become exposed to rain, snow, snow melt, and/or runoff, the conditions for this exclusion no longer apply. In such cases, the discharge becomes subject to enforcement for un-permitted discharge. Any conditionally exempt discharger who anticipates changes in circumstances should apply for and obtain permit coverage prior to the change of circumstances.

iii) The Department retains the authority to require permit coverage (and deny this exclusion) upon making a determination that the discharge causes, has reasonable potential to cause, or contributes to an instream excursion above an applicable water quality standard, including designated uses.

iv) The Department will notify the permittee in writing of its approval of the "no exposure' conditional exclusion and termination of permit coverage. The owner or operator must maintain this notification on site.

SCHEDULE A
STORM WATER POLLUTION CONTROL PLAN

1. **Preparation and Implementation of the Storm Water Pollution Control Plan (SWPCP)**
   The permittee must prepare and implement the SWPCP according to the following:
   a) The SWPCP must be prepared according to the requirements in Schedule A.2 by a person knowledgeable in storm water management and familiar with the facility. The person(s) preparing the plan must be identified in the plan.
   b) The SWPCP must be signed in accordance with 40 CFR §122.22. Updates and revisions to the SWPCP must also be signed and certified pursuant to 40 CFR §122.22.
   c) The SWPCP must be prepared and implemented according to the time frames set forth in Schedule C.
   d) The SWPCP must be kept current and updated as necessary to reflect any changes in facility operation.
   e) The SWPCP and updates to the SWPCP must be submitted to the Department in accordance with Schedule B.3.
   f) A copy of the SWPCP must be kept at the facility and made available upon request to government agencies responsible for storm water management in the permittee's area.

2. **Storm Water Pollution Control Plan Requirements**
   a) **Site Description** The SWPCP must contain the following information:
      i) A description of the industrial activities conducted at the site. Include a description of the significant materials (see Schedule D.3, Definitions) that are stored, used, treated and/or disposed of in a manner that allows exposure to storm water. Also describe the methods of storage, usage, treatment and/or disposal.
      ii) A general location map showing the location of the site in relation to surrounding properties, transportation routes, surface waters and other relevant features.
      iii) A site map including the following:
         (1) drainage patterns
         (2) drainage and discharge structures
         (3) outline of the drainage area for each storm water outfall
         (4) paved areas and buildings within each drainage area
         (5) areas used for outdoor manufacturing, treatment, storage, and/or disposal of significant materials
         (6) existing structural control measures for reducing pollutants in storm water runoff
         (7) material loading and access areas
         (8) hazardous waste treatment, storage and disposal facilities
         (9) location of wells including waste injection wells, seepage pits, drywells, etc.
         (10) location of springs, wetlands and other surface water bodies.
      iv) Estimates of the amount of impervious surface area (including paved areas and building roofs) relative to the total area drained by each storm water outfall.
      v) For each area of the site where a reasonable potential exists for contributing pollutants to storm water runoff, identify the potential pollutants that could be present in storm water discharges.
      vi) The name(s) of the receiving water(s) for storm water drainage. If drainage is to a municipal storm sewer system, the name(s) of the ultimate receiving waters and the name of the municipality.
      vii) Identification of the discharge outfall(s) and the point(s) where storm water monitoring will occur as required by Schedule B. If multiple discharge outfalls exist but will not all

be monitored (as allowed in Schedule B.1.c), a description supporting this approach must also be included.

b) **Site Controls** The permittee must maintain existing controls and/or develop new controls appropriate for the site. The purpose of these controls is to eliminate or minimize the exposure of pollutants to storm water. In developing a control strategy, the SWPCP must have the following minimum components. A description of each component must be included in the SWPCP.

i) *Storm Water Best Management Practices* If technically and economically feasible, the following best management practices must be employed at the site. A schedule for implementation of these practices must be included in the SWPCP if the practice has not already been accomplished. This schedule must be consistent with the requirements for developing and implementing the SWPCP in Schedule C of the permit.

(1) Containment - All hazardous substances (see Schedule D.3, Definitions) must be stored within berms or other secondary containment devices to prevent leaks and spills from contaminating storm water. If the use of berms or secondary containment devices is not possible, then hazardous substances must be stored in areas that do not drain to the storm sewer system.

(2) Oil and Grease - Oil/Water separators, booms, skimmers or other methods must be employed to eliminate or minimize oil and grease contamination of storm water discharges.

(3) Waste Chemicals and Material Disposal - Wastes must be recycled or properly disposed of in a manner to eliminate or minimize exposure of pollutants to storm water. All waste contained in bins or dumpsters where there is a potential for drainage of storm water through the waste must be covered to prevent exposure of storm water to these pollutants. Acceptable covers include, but are not limited to, storage of bins or dumpsters under roofed areas and use of lids or temporary covers such as tarps.

(4) Erosion and Sediment Control - Erosion control methods such as vegetating exposed areas, graveling or paving must be employed to minimize erosion of soil at the site. Sediment control methods such as detention facilities, sediment control fences, vegetated filter strips, bioswales, or grassy swales must be employed to minimize sediment loads in storm water discharges. For activities that involve land disturbance, the permittee must contact the local municipality to determine if there are other applicable requirements.

(5) Debris Control - Screens, booms, settling ponds, or other methods must be employed to eliminate or minimize debris in storm water discharges.

(6) Storm Water Diversion - Storm water must be diverted away from fueling, manufacturing, treatment, storage, and disposal areas to prevent exposure of uncontaminated storm water to potential pollutants.

(7) Covering Activities - Fueling, manufacturing, treatment, storage, and disposal areas must be covered to prevent exposure of storm water to potential pollutants. Acceptable covers include, but are not limited to, permanent structures such as roofs or buildings and temporary covers such as tarps.

(8) Housekeeping - Areas that may contribute pollutants to storm water must be kept clean. Sweeping, prompt clean up of spills and leaks, and proper maintenance of vehicles must be employed to eliminate or minimize exposure of storm water to pollutants.

ii) *Spill Prevention and Response Procedures* Methods to prevent spills along with clean-up and notification procedures must be included in the SWPCP. These methods and procedures must be made available to appropriate personnel. The required clean up material must be on-site or readily available. Spills prevention plans required by other regulations may be substituted for this provision providing that storm water management concerns are adequately addressed.

iii) *Preventative Maintenance* A preventative maintenance program must be implemented to ensure the effective operation of all storm water best management practices. At a minimum the program must include:
   (1) Monthly inspections of areas where potential spills of significant materials or industrial activities could impact storm water runoff.
   (2) Monthly inspections of storm water control measures, structures, catch basins, and treatment facilities.
   (3) Cleaning, maintenance and/or repair of all materials handling and storage areas and all storm water control measures, structures, catch basins, and treatment facilities as needed upon discovery. Cleaning, maintenance, and repair of such systems must be performed in such a manner as to prevent the discharge of pollution.

iv) *Employee Education* An employee orientation and education program must be developed and maintained to inform personnel of the components and goals of the SWPCP. The program must also address spill response procedures and the necessity of good housekeeping practices. A schedule for employee education must be included in the SWPCP. The Department recommends this education and training occur at the time of an employee's hire and annually thereafter.

c) **Record Keeping and Internal Reporting Procedures** The following information must be recorded and maintained at the facility and provided to the Department and other government agencies upon request. This information does not need to be submitted as part of the SWPCP.
   i) Inspection, maintenance, repair and education activities as required by the SWPCP.
   ii) Spills or leaks of significant materials that impacted or had the potential to impact storm water or surface waters. Include the corrective actions to clean up the spill or leak as well as measures to prevent future problems of the same nature.

ADDITIONAL REQUIREMENTS

3. **Oregon Administrative Rule 340-041-0026(3)(a)(D), Surface Water Temperature Management Plan** Individual storm water discharges are not expected to cause a measurable increase in stream temperature because the storm water discharges mainly occur at a time of year when ambient stream and runoff temperatures are relatively low. Compliance with this permit meets the requirement of OAR 340-041-0026(3)(a)(D) to develop and implement a surface water temperature management plan. If permitted storm water discharges in a particular basin are assigned waste load allocations under a Total Maximum Daily Load for temperature, then permittees in this basin will be required to implement additional management practices to reduce the temperature of the discharges. These practices include, but are not limited to, increased vegetation to provide for shading, underground conveyance systems or detention vaults, and filter treatment systems to reduce detention times.

4. **Storm Water Only** This permit only regulates the discharge of storm water. It does not authorize the discharge or on-site disposal of process wastewater, wash water, boiler blowdown, cooling

water, air conditioning condensate, deicing residues, or any other non-storm discharges associated with the facility. The Department recommends that piping and drainage systems for floor drains and other process wastewater discharge points be separated from the storm drainage system to prevent inadvertent discharge of pollutants to waters of the state.

Any other wastewater discharge or disposal must be permitted in a separate permit. A separate Department permit may not be required if the wastewater is reused or recycled without discharge or disposal, or discharged to the sanitary sewer with approval from the local sanitary authority.

5. **Water Quality Limited Streams** - If Total Maximum Daily Loads are established and the discharge from a permitted source is assigned a waste load allocation, application for an individual or different general permit or other appropriate tools may be required to address the allocation.

6. **Water Quality Standards** The ultimate goal for permittees is to comply with water quality standards in OAR 340-041. In instances where a storm water discharge adversely impacts water quality, the Department may require the facility to implement additional management practices, apply for an individual permit, or take other appropriate action.

CODE OF FEDERAL REGULATION STORM WATER DISCHARGE LIMITATIONS

7. The permittee with the following activities must be in compliance with the applicable limitations at the time of permit assignment:

CFR Industry		Parameter	Limitation	
Category	Subcategory			
Cement manufacturing (40 CFR §411)	Materials storage piles runoff	pH	6.0 - 9.0 SU	
		Total Suspended Solids (TSS)	50 mg/l	
Steam powered electric power generating (40 CFR §423)	Coal pile runoff	TSS	50 mg/l, Daily Maximum	
Paving and roofing materials (tars and asphalt) (40 CFR §443)	Runoff from manufacturing of asphalt paving or roofing emulsion	Oil & Grease	20 mg/l, Daily Maximum	15 mg/l, 30 Day Average
		pH	6.0 - 9.0 SU	

STORM WATER DISCHARGE BENCHMARKS

8. **Benchmarks** Benchmarks are guideline concentrations not limitations. They are designed to assist the permittee in determining if the implementation of their SWPCP is reducing pollutant concentrations to below levels of concern. For facilities that are subject to federal limitations, benchmarks apply to only those pollutants that are not limited by the federal regulations. The following benchmarks apply to each point source discharge of storm water associated with industrial activity:

Parameter	Benchmark
Total Copper	0.1 mg/l
Total Lead	0.4 mg/l
Total Zinc	0.6 mg/l
pH	5.5 – 9.0 SU
Total Suspended Solids	130 mg/l
Total Oil & Grease	10 mg/l
E. coli**	406 counts/100 ml
Floating Solids (associated with industrial activities)	No Visible Discharge
Oil & Grease Sheen	No Visible Sheen

** The benchmark for E. coli applies only to landfills, if septage and sewage biosolids are disposed at the site, and sewage treatment plants.

9. **Review of SWPCP** If benchmarks are not achieved, the permittee must investigate the source of the elevated pollutant levels and review and, if necessary, revise the SWPCP within 60 days of receiving sampling results. The purpose of this review is to determine if the SWPCP is being followed and to identify any additional technically and economically feasible site controls that need to be implemented to further improve the quality of storm water discharges. These site controls include best management practices, spill prevention and response procedures, preventative maintenance, and employee education procedures as described in Schedule A.2.b.

   a) **SWPCP Revision** Any newly identified site controls must be implemented in a timely manner and incorporated into the SWPCP as an update. A new SWPCP is not required. If no additional site controls are identified, the permittee must state as such in an update to the SWPCP.

   b) **SWPCP Revision Submittal** Results of this review must be submitted to the Department in accordance with Schedule B.3 and made available upon request to government agencies responsible for storm water management in the permittee's area.

   c) **Background or Natural Conditions** If the permittee demonstrates that background or natural conditions not associated with industrial activities at the site cause an exceedance of a benchmark, then no further modifications to the SWPCP are required for that parameter. Upon successful demonstration of natural or background conditions through monitoring of the same storm event used to evaluate benchmarks the permittee would be eligible for the monitoring reduction as outlined in Schedule B.2.

SCHEDULE B
MONITORING AND REPORTING REQUIREMENTS

1. **Minimum Monitoring Requirements**
   a) All permittees must monitor storm water associated with industrial activity for the following:

GRAB SAMPLES OF STORM WATER	
Parameter*	**Frequency**
Total Copper	Twice per Year
Total Lead	Twice per Year
Total Zinc	Twice per Year
pH	Twice per Year
Total Suspended Solids	Twice per Year
Total Oil & Grease	Twice per Year
E. coli**	Twice per Year

* Parameters should be analyzed on samples collected from the same storm event.

** The monitoring for E. coli applies only to landfills, if septage and sewage biosolids are disposed at the site, and sewage treatment plants.

VISUAL MONITORING OF STORM WATER	
Parameter	**Frequency**
Floating Solids (associated with industrial activities)	Once a Month (when discharging)
Oil & Grease Sheen	Once a Month (when discharging)

   b) **Grab Samples** Grab samples that are representative of the discharge must be taken at least 60 days apart. It is preferred, but not required, that one sample be collected in the fall and one in the spring. Compositing of samples from different drainage areas is not allowed.

   c) **Multiple Point Source Discharges** The permittee may reduce the number of storm water monitoring points provided the outfalls have substantially identical effluents. Substantially identical effluents are discharges from drainage areas serving similar activities where the discharges are expected to be similar in composition. Outfalls serving areas with no exposure of storm water to industrial activities are not required to be monitored.

   d) **Monitoring Location** All samples must be taken at monitoring points specified in the SWPCP before the storm water joins or is diluted by any other wastestream, body of water or substance unless otherwise approved in writing by the Department.

2. **Monitoring Reduction**
   a) **Visual Observations** There is no reduction allowed of the required visual observations.

   b) **Grab Samples** The permittee is not required to conduct sampling if the benchmarks specified in Schedule A.8 are met, or if the exceedance is due to natural or background conditions for at least four consecutive storm water monitoring events conducted by the permittee over 24 continuous months. Note that there is no reduction in monitoring allowed for facilities subject to limitations under CFR (Schedule A.7).
      i) Results from sampling events cannot be averaged to meet the benchmarks.

ii) Monitoring waivers may be allowed for individual parameters.
iii) Parameters in exceedance or not previously sampled must be monitored as required in Schedule B.1 until the monitoring waiver condition above is met.
iv) Monitoring data from the previous permit period may be used to meet the waiver requirement. This data must be evaluated against the benchmarks specified in this permit.
v) Monitoring data from the same storm event must be used to demonstrate that background or natural conditions not associated with industrial activities at the site are contributing to the exceedance of a benchmark.
vi) The permittee must submit written notification to the Department when exercising the monitoring waiver condition (refer to Schedule B.3.b).

c) **Reinstatement of Monitoring Requirements**
i) The permittee must conduct monitoring as specified in Schedule B.1 if changes to site conditions are expected to affect storm water discharge characteristics.
ii) The Department may reinstate monitoring requirements as specified in Schedule B.1 if prior monitoring efforts were improper or results were incorrect. The Department will notify the permittee of reinstatement in writing.
iii) Monitoring may also be reinstated if future sampling efforts by the permittee or the Department indicate benchmarks are being exceeded.
iv) If no monitoring was performed during the previous permit period, the permittee must reinitiate monitoring as specified in Schedule B.1 to qualify for the monitoring reduction allowed in Schedule B.2.

3. **Reporting Requirements** The permittee must submit the following to the appropriate DEQ regional office (DEQ will provide regional office information when the permittee is notified that permit coverage has been obtained):

a) **Monitoring Data** The permittee must submit by July 15 of each year grab sampling and visual monitoring data for the previous monitoring period (July 1- June 30). If there was insufficient rainfall to collect samples, the permittee must notify the Department by July 15 of each year. The permittee must also report the minimum detection levels and analytical methods for the parameters analyzed.

b) **Monitoring Reduction Notification** The permittee must submit written notification when exercising the monitoring reduction condition in Schedule B.2.b.

c) **Initial Completion or Update of SWPCP** The permittee must prepare or update the SWPCP in accordance with Schedule C of the permit. The permittee must submit an updated or completed SWPCP within 14 days after completion.

d) **SWPCP Revision (when benchmarks are exceeded)** The permittee must submit any revisions to the SWPCP required by Schedule A.9 within 14 days after the SWPCP is revised. If the Department does not review and comment on the revised SWPCP within 30 days, the permittee must implement the revisions as proposed. The permittee may proceed immediately with implementation of the following management practices as described in Schedule A.2.b without waiting for Department comment: waste chemical and materials disposal, debris control, storm water diversion, covering activities, housekeeping, and preventative maintenance.

SCHEDULE C
COMPLIANCE CONDITIONS AND SCHEDULES

1. **Existing Permittee** (for a facility with an NPDES storm water discharge permit assigned prior to June 30,2002):

   a) Not later than 90 days after receiving this permit, the existing permittee must revise and begin implementation of the SWPCP to meet any new permit requirements.

   b) Except for site controls that require capital improvements (see Schedule D.3, Definitions), the SWPCP must be implemented within 90 days after revision of SWPCP. Site control activities that require capital improvements must be completed in accordance with the schedule set forth in the SWPCP.

2. **New Permittee with Existing Facility** (for a facility operating prior to June 30, 2002, without an NPDES storm water discharge permit):

   a) Not later than 90 days after receiving this permit, the new permittee must prepare and begin implementation of the SWPCP.

   b) Except for site controls that require capital improvements (see Schedule D.3, Definitions), the SWPCP must be implemented within 90 days after completion of SWPCP. Site control activities that require capital improvements must be completed in accordance with the schedule set forth in the SWPCP.

3. **New Permittee with New Facility** (for a facility beginning operation after June 30, 2002):

   a) Prior to starting operations, a new permittee must prepare and begin implementation of the SWPCP.

   b) Except for site controls that require capital improvements (see Schedule D.3, Definitions), the SWPCP must be implemented within 90 days after beginning operation. Site control activities that require capital improvements must be completed in accordance with the schedule set forth in the SWPCP.

4. **New Permittee Discharging to Clackamas River, McKenzie River above Hayden Bridge (River Mile 15) or North Santiam River.** Not later than 180 days after receiving this permit, new permittees discharging to Clackamas River, McKenzie River above Hayden Bridge (river mile 15) or North Santiam River must submit to the Department a monitoring and water quality evaluation program. This program must be effective in evaluating the in-stream impacts of the discharge as required by OAR 340-041-0470. Within 30 days after Department approval, the permittee must implement the monitoring and water quality evaluation program. For the purpose of this condition, new permittees include potential or existing dischargers that did not have a permit prior to January 28, 1994, and existing dischargers that have a permit but request an increased load limitation.

SCHEDULE D
SPECIAL CONDITIONS

1. **Releases in Excess of Reportable Quantities.** This permit does not relieve the permittee of the reporting requirements of 40 CFR §117 Determination of Reportable Quantities for Hazardous Substances and 40 CFR §302 Designation, Reportable Quantities, and Notification.

2. **Availability of SWPCP and Monitoring Data.** The Storm Water Pollution Control Plan and/or storm water monitoring data must be made available to government agencies responsible for storm water management in the permittee's area.

3. **Definitions**

   a) *Capital Improvements* means the following improvements that require capital expenditures:
      i) Treatment best management practices including but not limited to settling basins, oil/water separation equipment, catch basins, grassy swales, detention/retention basins, and media filtration devices.
      ii) Manufacturing modifications that incur capital expenditures, including process changes for reduction of pollutants or wastes at the source.
      iii) Concrete pads, dikes and conveyance or pumping systems utilized for collection and transfer of storm water to treatment systems.
      iv) Roofs and appropriate covers for manufacturing areas.

   b) *Hazardous Substances* as defined in 40 CFR §302 Designation, Reportable Quantities, and Notification.

   c) *Material Handling Activities* include the storage, loading and unloading, transportation or conveyance of raw material, intermediate product, finished product, by-product or waste product.

   d) *Point Source* means a discharge from any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, or conduit.

   e) *Significant Materials* includes, but is not limited to: raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under section 101(14) of CERCLA; any chemical that a facility is required to report pursuant to section 313 of title III of SARA; fertilizers; pesticides; and waste products such as ash, slag, and sludge that have the potential to be released with storm water discharges.

4. **Local Public Agencies Acting as the Department's Agent**
   The Department authorizes local public agencies to act as its Agent in implementing this permit. The Department's Agent may be authorized to conduct the following activities, including but not limited to: application review and approval, inspections, monitoring data review, storm water and wastewater monitoring, SWPCP review, and verification and approval of no-exposure certifications. Where the Department has entered into such an agreement, the Department or its Agent will notify the permittee of where to submit monitoring data, SWPCPs, no-exposure certifications, and other notifications or correspondence associated with this permit.

SCHEDULE F
NPDES GENERAL CONDITIONS

SECTION A. STANDARD CONDITIONS

1. Duty to Comply
The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of Oregon Revised Statutes (ORS) 468B.025 and is grounds for enforcement action; for permit termination, suspension, or modification; or for denial of a permit renewal application.

2. Penalties for Water Pollution and Permit Condition Violations
Oregon Law (ORS 468.140) allows the Director to impose civil penalties up to $10,000 per day for violation of a term, condition, or requirement of a permit.

Under ORS 468.943, unlawful water pollution, if committed by a person with criminal negligence, is punishable by a fine of up to $25,000 or by imprisonment for not more than one year, or by both. Each day on which a violation occurs or continues is a separately punishable offense.

Under ORS 468.946, a person who knowingly discharges, places or causes to be placed any waste into the waters of the state or in a location where the waste is likely to escape into the waters of the state, is subject to a Class B felony punishable by a fine not to exceed $200,000 and up to 10 years in prison.

3. Duty to Mitigate
The permittee must take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment. In addition, upon request of the Department, the permittee must correct any adverse impact on the environment or human health resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

4. Duty to Reapply
If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply to have the permit renewed. The application must be submitted at least 180 days before the expiration date of this permit.

The Director may grant permission to submit an application less than 180 days in advance but no later than the permit expiration date.

5. Permit Actions
This permit may be modified, suspended, revoked and reissued, or terminated for cause including, but not limited to, the following:

   a. Violation of any term, condition, or requirement of this permit, a rule, or a statute;
   b. Obtaining this permit by misrepresentation or failure to disclose fully all material facts; or
   c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.
   d. The permittee shall pay the fees required to be filed with this permit application and to be paid annually for permit compliance determination as outlined in the Oregon Administrative Rules, Chapter 340, Division 045.

The filing of a request by the permittee for a permit modification or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

6. Toxic Pollutants
The permittee must comply with any applicable effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants within the time provided in the regulations that establish those standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

7. Property Rights
The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

8. Permit References
Except for effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants and standards for sewage sludge use or disposal established under Section 405(d) of the Clean Water Act, all rules and statutes referred to in this permit are those in effect on the date this permit is issued.

SECTION B. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. Proper Operation and Maintenance
The permittee must at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls, and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

2. Duty to Halt or Reduce Activity
For industrial or commercial facilities, upon reduction, loss, or failure of the treatment facility, the permittee must, to the extent necessary to maintain compliance with its permit, control production or all discharges or both until the facility is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment facility fails or is reduced or lost. It is not a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Bypass of Treatment Facilities
   a. Definitions
      (1) "Bypass" means intentional diversion of waste streams from any portion of the treatment facility. The term "bypass" does not include nonuse of singular or multiple units or processes of a treatment works when the nonuse is insignificant to the quality and/or quantity of the effluent produced by the treatment works. The term "bypass" does not apply if the diversion does not cause effluent limitations to be exceeded, provided the diversion is to allow essential maintenance to assure efficient operation.
      (2) "Severe property damage" means substantial physical damage to property, damage to the treatment facilities or treatment processes which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

   b. Prohibition of bypass.
      (1) Bypass is prohibited unless:
         (a) Bypass was necessary to prevent loss of life, personal injury, or severe property damage;
         (b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and
         (c) The permittee submitted notices and requests as required under General Condition B.3.c.
      (2) The Director may approve an anticipated bypass, after considering its adverse effects and any alternatives to bypassing, when the Director determines that it will meet the three conditions listed above in General Condition B.3.b.(1).

   c. Notice and request for bypass.
      (1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it must submit prior written notice, if possible at least ten days before the date of the bypass.
      (2) Unanticipated bypass. The permittee must submit notice of an unanticipated bypass as required in General Condition D.5.

4. Upset
   a. Definition. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operation error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventative maintenance, or careless or improper operation.

b. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of General Condition B.4.c are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

c. Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset must demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
(1) An upset occurred and that the permittee can identify the causes(s) of the upset;
(2) The permitted facility was at the time being properly operated;
(3) The permittee submitted notice of the upset as required in General Condition D.5, hereof (24-hour notice); and
(4) The permittee complied with any remedial measures required under General Condition A.3 hereof.

d. Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

5. Treatment of Single Operational Event
For purposes of this permit, A Single Operational Event which leads to simultaneous violations of more than one pollutant parameter must be treated as a single violation. A single operational event is an exceptional incident which causes simultaneous, unintentional, unknowing (not the result of a knowing act or omission), temporary noncompliance with more than one Clean Water Act effluent discharge pollutant parameter. A single operational event does not include Clean Water Act violations involving discharge without a NPDES permit or noncompliance to the extent caused by improperly designed or inadequate treatment facilities. Each day of a single operational event is a violation.

6. Overflows from Wastewater Conveyance Systems and Associated Pump Stations
a. Definitions
(1) "Overflow" means the diversion and discharge of waste streams from any portion of the wastewater conveyance system including pump stations, through a designed overflow device or structure, other than discharges to the wastewater treatment facility.
(2) "Severe property damage" means substantial physical damage to property, damage to the conveyance system or pump station which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of an overflow.
(3) "Uncontrolled overflow" means the diversion of waste streams other than through a designed overflow device or structure, for example to overflowing manholes or overflowing into residences, commercial establishments, or industries that may be connected to a conveyance system.

b. Prohibition of overflows. Overflows are prohibited unless:
(1) Overflows were unavoidable to prevent an uncontrolled overflow, loss of life, personal injury, or severe property damage;
(2) There were no feasible alternatives to the overflows, such as the use of auxiliary pumping or conveyance systems, or maximization of conveyance system storage; and
(3) The overflows are the result of an upset as defined in General Condition B.4. and meeting all requirements of this condition.

c. Uncontrolled overflows are prohibited where wastewater is likely to escape or be carried into the waters of the State by any means.

d. Reporting required. Unless otherwise specified in writing by the Department, all overflows and uncontrolled overflows must be reported orally to the Department within 24 hours from the time the permittee becomes aware of the overflow. Reporting procedures are described in more detail in General Condition D.5.

7. Public Notification of Effluent Violation or Overflow
If effluent limitations specified in this permit are exceeded or an overflow occurs, upon request by the Department, the permittee must take such steps as are necessary to alert the public about the extent and nature of the discharge. Such steps may include, but are not limited to, posting of the river at access points and other places, news releases, and paid announcements on radio and television.

8. Removed Substances
Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters must be disposed of in such a manner as to prevent any pollutant from such materials from entering public waters, causing nuisance conditions, or creating a public health hazard.

SECTION C. MONITORING AND RECORDS

1. Representative Sampling
Sampling and measurements taken as required herein must be representative of the volume and nature of the monitored discharge. All samples must be taken at the monitoring points specified in this permit and must be taken, unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body of water, or substance. Monitoring points must not be changed without notification to and the approval of the Director.

2. Flow Measurements
Appropriate flow measurement devices and methods consistent with accepted scientific practices must be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices must be installed, calibrated and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected must be capable of measuring flows with a maximum deviation of less than ± 10 percent from true discharge rates throughout the range of expected discharge volumes.

3. Monitoring Procedures
Monitoring must be conducted according to test procedures approved under 40 CFR §136, unless other test procedures have been specified in this permit.

4. Penalties of Tampering
The Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate, any monitoring device or method required to be maintained under this permit must, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than two years, or by both. If a conviction of a person is for a violation committed after a first conviction of such person, punishment is a fine not more than $20,000 per day of violation, or by imprisonment of not more than four years or both.

5. Reporting of Monitoring Results
Monitoring results must be summarized each month on a Discharge Monitoring Report form approved by the Department. The reports must be submitted monthly and are to be mailed, delivered or otherwise transmitted by the 15th day of the following month unless specifically approved otherwise in Schedule B of this permit.

6. Additional Monitoring by the Permittee
If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR §136 or as specified in this permit, the results of this monitoring must be included in the calculation and reporting of the data submitted in the Discharge Monitoring Report. Such increased frequency must also be indicated. For a pollutant parameter that may be sampled more than once per day (e.g., Total Chlorine Residual), only the average daily value must be recorded unless otherwise specified in this permit.

7. Averaging of Measurements
Calculations for all limitations which require averaging of measurements must utilize an arithmetic mean, except for bacteria which must be averaged as specified in this permit.

8. Retention of Records
Except for records of monitoring information required by this permit related to the permittee's sewage sludge use and disposal activities, which must be retained for a period of at least five years (or longer as required by 40 CFR §503), the permittee must retain records of all monitoring information, including all calibration and maintenance records of all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report or application. This period may be extended by request of the Director at any time.

9. Records Contents
Records of monitoring information must include:
   a. The date, exact place, time and methods of sampling or measurements;
   b. The individual(s) who performed the sampling or measurements;
   c. The date(s) analyses were performed;
   d. The individual(s) who performed the analyses;
   e. The analytical techniques or methods used; and
   f. The results of such analyses.

10. Inspection and Entry
The permittee must allow the Director, or an authorized representative upon the presentation of credentials to:
   a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit, and
   d. Sample or monitor at reasonable times, for the purpose of assuring permit compliance or as otherwise authorized by state law, any substances or parameters at any location.

SECTION D. REPORTING REQUIREMENTS

1. Planned Changes
The permittee must comply with Oregon Administrative Rules (OAR) 340, Division 052, "Review of Plans and Specifications". Except where exempted under OAR 340-052, no construction, installation, or modification involving disposal systems, treatment works, sewerage systems, or common sewers must be commenced until the plans and specifications are submitted to and approved by the Department. The permittee must give notice to the Department as soon as possible of any planned physical alternations or additions to the permitted facility.

2. Anticipated Noncompliance
The permittee must give advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

3. Transfers
This permit may be transferred to a new permittee provided the transferee acquires a property interest in the permitted activity and agrees in writing to fully comply with all the terms and conditions of the permit and the rules of the Commission. No permit must be transferred to a third party without prior written approval from the Director. The permittee must notify the Department when a transfer of property interest takes place.

4. Compliance Schedule
Reports of compliance or noncompliance with, or any progress reports on interim and final requirements contained in any compliance schedule of this permit must be submitted no later than 14 days following each schedule date. Any reports of noncompliance must include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirements.

5. Twenty-Four Hour Reporting
The permittee must report any noncompliance which may endanger health or the environment. Any information must be provided orally (by telephone) within 24 hours, unless otherwise specified in this permit, from the time the permittee becomes aware of the circumstances. During normal business hours, the Department's Regional office must be called. Outside of normal business hours, the Department must be contacted at 1-800-452-0311 (Oregon Emergency Response System).

A written submission must also be provided within 5 days of the time the permittee becomes aware of the circumstances. If the permittee is establishing an affirmative defense of upset or bypass to any offense under ORS 468.922 to 468.946, and in which case if the original reporting notice was oral, delivered written notice must be made to the Department or other agency with regulatory jurisdiction within 4 (four) calendar days. The written submission must contain:
   a. A description of the noncompliance and its cause;
   b. The period of noncompliance, including exact dates and times;

c. The estimated time noncompliance is expected to continue if it has not been corrected;
d. Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance; and
e. Public notification steps taken, pursuant to General Condition B.7.

The following must be included as information which must be reported within 24 hours under this paragraph:
a. Any unanticipated bypass which exceeds any effluent limitation in this permit.
b. Any upset which exceeds any effluent limitation in this permit.
c. Violation of maximum daily discharge limitation for any of the pollutants listed by the Director in this permit.

The Department may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

6. Other Noncompliance
The permittee must report all instances of noncompliance not reported under General Condition D.4 or D.5, at the time monitoring reports are submitted. The reports must contain:
a. A description of the noncompliance and its cause;
b. The period of noncompliance, including exact dates and times;
c. The estimated time noncompliance is expected to continue if it has not been corrected; and
d. Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

7. Duty to Provide Information
The permittee must furnish to the Department, within a reasonable time, any information which the Department may request to determine compliance with this permit. The permittee must also furnish to the Department, upon request, copies of records required to be kept by this permit.

Other Information: When the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or any report to the Department, it must promptly submit such facts or information.

8. Signatory Requirements
All applications, reports or information submitted to the Department must be signed and certified in accordance with 40 CFR §122.22.

9. Falsification of Reports
Under ORS 468.953, any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance, is subject to a Class C felony punishable by a fine not to exceed $100,000 per violation and up to 5 years in prison.

10. Changes to Indirect Dischargers - **[Applicable to Publicly Owned Treatment Works (POTW) only]**
The permittee must provide adequate notice to the Department of the following:
a. Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to section 301 or 306 of the Clean Water Act if it were directly discharging those pollutants and;
b. Any substantial change in the volume or character of pollutants being introduced into the POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.
c. For the purposes of this paragraph, adequate notice must include information on (i) the quality and quantity of effluent introduced into the POTW, and (ii) any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

11. Changes to Discharges of Toxic Pollutant - **[Applicable to existing manufacturing, commercial, mining, and silvicultural dischargers only]**
The permittee must notify the Department as soon as they know or have reason to believe of the following:

a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:
(1) One hundred micrograms per liter (100 μg/l);
(2) Two hundred micrograms per liter (200 μg/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 μg/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;

(3) Five (5) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR §122.21(g)(7); or
(4) The level established by the Department in accordance with 40 CFR §122.44(f).

b. That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":
(1) Five hundred micrograms per liter (500 µg/l);
(2) One milligram per liter (1 mg/l) for antimony;
(3) Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR §122.21(g)(7); or
(4) The level established by the Department in accordance with 40 CFR §122.44(f).

SECTION E. DEFINITIONS

1. BOD means five-day biochemical oxygen demand.
2. TSS means total suspended solids.
3. mg/l means milligrams per liter.
4. kg means kilograms.
5. m^3/d means cubic meters per day.
6. MGD means million gallons per day.
7. Composite sample means a sample formed by collecting and mixing discrete samples taken periodically and based on time or flow.
8. FC means fecal coliform bacteria.
9. Technology based permit effluent limitations means technology-based treatment requirements as defined in 40 CFR §125.3, and concentration and mass load effluent limitations that are based on minimum design criteria specified in OAR 340-041.
10. CBOD means five day carbonaceous biochemical oxygen demand.
11. Grab sample means an individual discrete sample collected over a period of time not to exceed 15 minutes.
12. Quarter means January through March, April through June, July through September, or October through December.
13. Month means calendar month.
14. Week means a calendar week of Sunday through Saturday.
15. Total residual chlorine means combined chlorine forms plus free residual chlorine.
16. The term "bacteria" includes but is not limited to fecal coliform bacteria, total coliform bacteria, and E. coli bacteria.
17. POTW means a publicly owned treatment works.

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DATE: 12/12/2007
CLIENT: Schnitzer Steel
P.O. BOX 10047
Portland OR, 97296

ATTN: James Jakubiak
FAX: (503) 286-6948
Transmittal of the following number of pages:_____

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Storm water
12007
results

12/12/07

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: Stormwater:1200Z

SUBMITTED: 11/28/07 11:00

REPORT DATE: 12/12/07 13:29 **REPORT NUMBER:** 7112906

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
7112906-01	#3	11/29/2007	1530	Water
7112906-02	#4	11/29/2007	1545	Water
7112906-03	#5	11/29/2007	1555	Water
7112906-04	#8	11/29/2007	1610	Water
7112906-05	#14	11/29/2007	1500	Water
7112906-06	#15	11/29/2007	1510	Water
7112906-07	#20	11/29/2007	1515	Water

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME	NOTES
7112906-01	**SAMPLE ID: #3**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	9.8	mg/L	2.0	DK	12/07/2007 08:48	
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	1690	mg/L	5.00	KMC	12/05/2007 17:00	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	1.5	mg/L	0.005	KMC	12/11/2007 17:36	
LEAD - ICP		LEAD	4.07	mg/L	0.005	KMC	12/11/2007 17:36	
ZINC - ICP		ZINC	18	mg/L	0.003	KMC	12/11/2007 17:36	
7112906-02	**SAMPLE ID: #4**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DK	12/07/2007 08:48	
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	ND	mg/L	5.00	KMC	12/05/2007 17:00	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	1.5	mg/L	0.005	KMC	12/11/2007 17:36	
LEAD - ICP		LEAD	ND	mg/L	0.005	KMC	12/11/2007 17:36	
ZINC - ICP		ZINC	ND	mg/L	0.003	KMC	12/11/2007 17:36	
7112906-03	**SAMPLE ID: #5**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	9.5	mg/L	2.0	DK	12/07/2007 08:48	
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	1030	mg/L	5.00	KMC	12/05/2007 17:00	

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CI CERTIFICATE OF ANALYSIS

REPORT DATE: 12/12/07 13:29 REPORT NUMBER:7112906

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME	NOTES
7112906-03	**SAMPLE ID: #5**							
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.80	mg/L	0.005	KMC	12/11/2007 17:36	
LEAD - ICP		LEAD	4.89	mg/L	0.005	KMC	12/11/2007 17:36	
ZINC - ICP		ZINC	6.2	mg/L	0.003	KMC	12/11/2007 17:36	
7112906-04	**SAMPLE ID: #6**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DK	12/07/2007 08:48	
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	5.00	mg/L	5.00	KMC	12/05/2007 17:00	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.005	KMC	12/11/2007 17:36	
LEAD - ICP		LEAD	ND	mg/L	0.005	KMC	12/11/2007 17:36	
ZINC - ICP		ZINC	0.010	mg/L	0.003	KMC	12/11/2007 17:36	
7112906-05	**SAMPLE ID: #14**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	12.6	mg/L	2.0	DK	12/07/2007 08:48	
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	110	mg/L	5.00	KMC	12/05/2007 17:00	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.16	mg/L	0.005	KMC	12/11/2007 17:36	
LEAD - ICP		LEAD	0.511	mg/L	0.005	KMC	12/11/2007 17:36	
ZINC - ICP		ZINC	1.2	mg/L	0.003	KMC	12/11/2007 17:36	
7112906-06	**SAMPLE ID: #15**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	13.4	mg/L	2.0	DK	12/07/2007 08:48	
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	1570	mg/L	5.00	KMC	12/05/2007 17:00	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.91	mg/L	0.005	KMC	12/11/2007 17:36	
LEAD - ICP		LEAD	3.59	mg/L	0.005	KMC	12/11/2007 17:36	
ZINC - ICP		ZINC	8.7	mg/L	0.003	KMC	12/11/2007 17:36	
7112906-07	**SAMPLE ID: #20**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2.6	mg/L	2.0	DK	12/07/2007 08:48	
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	30.0	mg/L	5.00	KMC	12/05/2007 17:00	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.009	mg/L	0.005	KMC	12/11/2007 17:36	
LEAD - ICP		LEAD	0.007	mg/L	0.005	KMC	12/11/2007 17:36	

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REPORT DATE: 12/12/07 13:29 REPORT NUMBER:7112906 PAGE: 3 OF 6

SAMPLES ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME	NOTES
7112906-07	SAMPLE ID: #20							
Total Metals by Inductively Coupled Plasma								
ZINC - ICP	EPA 200.7/6010B	ZINC	0.17	mg/L	0.003	KMC	12/11/2007 17:36	

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General Bench Analysis - Quality Control

Batch/Sample/Analyte	Result	Detection Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
BATCH: Batch 7L06010 - General Preparation										
QC SAMPLE: Blank (7L06010-BLK1)					Prepared: 12/06/07 Analyzed: 12/07/07					
TOTAL OIL AND GREASE	ND	2.0	mg/L							
QC SAMPLE: LCS (7L06010-BS1)					Prepared: 12/06/07 Analyzed: 12/07/07					
TOTAL OIL AND GREASE	29.6	2.0	mg/L	40.0		74.0	79-114			SRM-2
QC SAMPLE: LCS Dup (7L06010-BSD1)					Prepared: 12/06/07 Analyzed: 12/07/07					
TOTAL OIL AND GREASE	31.6	2.0	mg/L	40.0		79.0	79-114	6.54	18	
BATCH: Batch 7L08001 - General Preparation										
QC SAMPLE: Blank (7L08001-BLK1)					Prepared & Analyzed: 12/05/07					
TOTAL SUSPENDED SOLIDS	ND	1.00	mg/L							
QC SAMPLE: Duplicate (7L08001-DUP1)					Source: 7120304-01 Prepared & Analyzed: 12/05/07					
TOTAL SUSPENDED SOLIDS	52.0	5.00	mg/L		48.0			8.00	20	
QC SAMPLE: Reference (7L08001-SRM1)					Prepared & Analyzed: 12/05/07					
TOTAL SUSPENDED SOLIDS	25.0	5.00	mg/L	27.6		90.6	80-120			

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CI CERTIFICATE OF ANALYSIS

Total Metals by Inductively Coupled Plasma - Quality Control

Batch/Sample/Analyte	Result	Detection Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
BATCH: Batch 7L11005 - ***Metals Prep***										
QC SAMPLE: Blank (7L11005-BLK1)					Prepared & Analyzed: 12/11/07					
COPPER	ND	0.005	mg/L							
LEAD	ND	0.005	"							
ZINC	ND	0.003	"							
QC SAMPLE: LCS (7L11005-BS1)					Prepared & Analyzed: 12/11/07					
COPPER	0.189	0.005	mg/L	0.222		85.1	80-120			
LEAD	0.187	0.005	"	0.222		84.2	80-120			
ZINC	0.188	0.003	"	0.222		84.7	80-120			
QC SAMPLE: LCS Dup (7L11005-BSD1)					Prepared & Analyzed: 12/11/07					
COPPER	0.192	0.005	mg/L	0.222		86.5	80-120	1.57	15	
LEAD	0.192	0.005	"	0.222		86.5	80-120	2.64	15	
ZINC	0.191	0.003	"	0.222		86.0	80-120	1.58	15	
QC SAMPLE: Calibration Blank (7L11005-CCB1)					Prepared & Analyzed: 12/11/07					
COPPER	ND	0.004	mg/L							
LEAD	ND	0.004	"							
ZINC	ND	0.003	"							
QC SAMPLE: Calibration Blank (7L11005-CCB2)					Prepared & Analyzed: 12/11/07					
COPPER	ND	0.004	mg/L							
LEAD	ND	0.004	"							
ZINC	ND	0.003	"							
QC SAMPLE: Calibration Blank (7L11005-CCB3)					Prepared & Analyzed: 12/11/07					
COPPER	ND	0.004	mg/L							
LEAD	ND	0.004	"							
ZINC	ND	0.003	"							

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CI CERTIFICATE OF ANALYSIS

Total Metals by Inductively Coupled Plasma - Quality Control

Batch/Sample/Analyte	Result	Detection Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
BATCH: Batch 7L11005 - ***Metals Prep***										
QC SAMPLE: Calibration Check (7L11005-CCV1)					Prepared & Analyzed: 12/11/07					
COPPER	0.870		mg/L	1.00		87.0	85-115			
LEAD	0.951		"	1.00		95.1	85-115			
ZINC	0.974		"	1.00		97.4	85-115			
QC SAMPLE: Calibration Check (7L11005-CCV2)					Prepared & Analyzed: 12/11/07					
COPPER	0.891		mg/L	1.00		89.1	85-115			
LEAD	0.979		"	1.00		97.9	85-115			
ZINC	0.973		"	1.00		97.3	85-115			
QC SAMPLE: Calibration Check (7L11005-CCV3)					Prepared & Analyzed: 12/11/07					
COPPER	0.946		mg/L	1.00		94.6	85-115			
LEAD	0.946		"	1.00		94.6	85-115			
ZINC	1.01		"	1.00		101	90-115			
QC SAMPLE: Matrix Spike (7L11005-MS1)				Source: 7120302-01	Prepared & Analyzed: 12/11/07					
COPPER	0.395	0.005	mg/L	0.444	ND	89.0	80-120			
LEAD	0.412	0.005	"	0.444	ND	92.8	80-120			
ZINC	0.521	0.003	"	0.444	0.050	106	80-120			
QC SAMPLE: Matrix Spike Dup (7L11005-MSD1)				Source: 7120302-01	Prepared & Analyzed: 12/11/07					
COPPER	0.401	0.005	mg/L	0.444	ND	90.3	80-120	1.51	15	
LEAD	0.419	0.005	"	0.444	ND	94.4	80-120	1.68	15	
ZINC	0.515	0.003	"	0.444	0.050	105	80-120	1.16	15	

Data Qualifiers:

Qualifier	Notes
SRM-2	The recovery of this SRM was low. The batch was accepted on the basis of other reference materials in this batch.

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☐ CI Benicia: 4592 E. 2nd St., Benicia, CA 94510 ph: (707) 748-7587
☐ CI San Pedro: 797 Channel St., San Pedro, CA 90731 ph: (310) 833-1557

Client Name: Schnitzer Steel	Project Name: SSI Portland Project #:
Contact: Jim Jakubick	Purchase Order #:
Address: Po Box 10097	Phone: (503) 286-6976 Fax:
City: Portland, State: OR. Zip: 97296-0097	Email:
TURN AROUND TIME: STANDARD 10 DAY RUSH: _____ DATE DUE: X	Sampled By: [signature]

REQUESTED ANALYSIS

SAMPLE ID	SAMPLE DESCRIPTION/UN NUMBER	SAMPLE MATRIX	SAMPLE DATE	SAMPLE TIME	Total Copper EPA 6010B	Total Lead EPA 7421	Total Zinc EPA 6010B	TSS EPA 160.2	Oil & Grease EPA 413.1					
#3		Water	11-28-07	1530	X	X	X	X	X					
#4		Water	11-28-07	1545	X	X	X	X	X					
#5		Water	11-28-07	1555	X	X	X	X	X					
#6		Water	11-28-07	1610	X	X	X	X	X					
#14		Water	11-28-07	1500	X	X	X	X	X					
#15		Water	11-28-07	1510	X	X	X	X	X					
#20		Water	11-28-07	1515	X	X	X	X	X					

Relinquished By:	Received By:	Relinquished By:	Received By:	WORK ORDER#: 7112906
[signature] Date: 11-29-07 Time: 11:00	[signature] Date: 11-29-07 Time: 11:00	Date: Time:	Date: Time:	DUE DATE: _____

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☐ CI San Pedro: 797 Channel St., San Pedro, CA 90731 ph: (310) 833-1557

Client Name: Schnitzer Steel	Project Name: SSI Portland Project #:
Contact: Jim Jakobiak	Purchase Order #:
Address: PO Box 10047	Phone: (503) 286-6976 Fax:
City: Portland State: OR Zip: 97296-0047	Email:
TURN AROUND TIME: STANDARD 10 DAY RUSH: _____ DATE DUE: X	Sampled By: [signature]

REQUESTED ANALYSIS

SAMPLE ID	SAMPLE DESCRIPTION/UN NUMBER	SAMPLE MATRIX	SAMPLE DATE	SAMPLE TIME	Total Copper EPA 6010B	Total Lead EPA 7421	Total Zinc EPA 6010B	TSS EPA 160.2	Oil & Grease EPA 413.1					
#3		Water	11-28-07	1530	X	X	X	X	X					
#4		Water	11-28-07	1545	X	X	X	X	X					
#5		Water	11-28-07	1555	X	X	X	X	X					
#6		Water	11-28-07	1610	X	X	X	X	X					
#14		Water	11-28-07	1500	X	X	X	X	X					
#15		Water	11-28-07	1510	X	X	X	X	X					
#20		Water	11-28-07	1515	X	X	X	X	X					

Relinquished By:	Received By:	Relinquished By:	Received By:	WORK ORDER#:
[signature] Date: 11-28-07 Time: 11:00	[signature] Date: 11-29-07 Time: 11:00	Date: Time:	Date: Time:	DUE DATE:

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SCHN00246147

Sample Acceptance Policy

All samples must meet the following requirements:

Chain Of Custody (COC)
The COC list of samples, as well as the descriptions, must match the number and type of samples received.

Applicable Containers
The sample containers used must be applicable & acceptable for the product in which is being contained. CI does not assume responsibility for contamination resulting from the use of improper containers.

Sample Volume
The container being used should contain the necessary volume (usually 3/4 capacity fill) in order to analyze without being too full causing leakage and/or possible sample contamination.

Sample Temperature (when applicable)
Samples that require refrigeration shall be considered acceptable if the temperature, as measured upon receipt, is either within 2° Celsius of the required temperature or, the temperature the method specifies. For samples with a specified temperature of 4° Celsius, samples received at temperatures ranging from just above freezing to 6° Celsius shall not be acceptable.

> **NOTE:**
> Samples delivered to CI laboratory shortly after sampling may not meet the above criterion. However, the samples shall be considered acceptable if the samples chilling process began prior to and arrival is indicative of such a process such as transport & arrival on ice or if sampled within 1 hour.

Holding Times
Sample hold times, when applicable, must be adhered to and not allowed to expire to be valid.

Sample Preservation
Where possible without sacrificing integrity of the sample, it shall be determined whether the bottle has been preserved as required.

Discrepancies
If there is doubt as to the suitability for testing, such as the does not conform to the sample description, the sample containers are damaged, leaking or possible contamination from other damaged or leaking sample containers or where testing isn't specified, further instructions from the client are required. If the issue cannot be resolved and the sample does not meet sample acceptance criteria, CI shall either:

- Fully document any decision to proceed with analysis & note the condition of the sample on the COC.
- Retain correspondence and/or records of communications regarding final disposition of rejected samples.

Rejected Samples
CI reserves the right to reject any sample that does not meet the CI sample acceptance protocol as outlined in CI laboratory Policy LP00.01, CI Sample Acceptance Policy and CI SOP 15.01.

Sample Disposal
Samples are disposed of after 45 days unless other prior arrangements have been made with CI. Hazardous samples may either be disposed of prior to the 45 days or returned to the client.

Payment
Payment for analysis is required prior to commencement of analysis unless a credit account with CI has been established. Submitting samples is an agreement to contract for the analysis requested and payment thereof.

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 05/21/07 15:00

REPORT DATE: 05/29/07 09:39 **REPORT NUMBER:** 7052105

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
7052105-01	Stormwater #6	05/21/2007	0830	Water
7052105-02	Stormwater #13	05/21/2007	0905	Water
7052105-03	Stormwater #14	05/21/2007	0908	Water
7052105-04	Stormwater #20	05/21/2007	0842	Water

5/22/07 9:19

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME	NOTES
7052105-01	**SAMPLE ID: Stormwater #6**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.2	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.62	SU		DAU	05/21/2007 15:50	
		TEMPERATURE (C)	18.7	SU				
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	48.0	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.007	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.072	mg/L	0.003	KEL	05/23/2007 09:53	
7052105-02	**SAMPLE ID: Stormwater #13**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.5	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.46	SU		DAU	05/21/2007 15:50	
		TEMPERATURE (C)	18.7	SU				
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	15.0	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.047	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	0.040	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.20	mg/L	0.003	KEL	05/23/2007 09:53	
7052105-03	**SAMPLE ID: Stormwater #14**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	6.2	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.88	SU		DAU	05/21/2007 15:50	

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Charles Morrow - Laboratory Director

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SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME	NOTES
7052105-03	**SAMPLE ID: Stormwater #14**							
General Bench Analysis								
PH	EPA 150.1/9040	TEMPERATURE (C)	18.9	SU		DAU	05/21/2007 15:50	
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	48.0	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.011	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.035	mg/L	0.003	KEL	05/23/2007 09:53	
7052105-04	**SAMPLE ID: Stormwater #20**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.31	SU		DAU	05/21/2007 15:50	
		TEMPERATURE (C)	18.8	SU				
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	8.00	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.048	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	0.017	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.21	mg/L	0.003	KEL	05/23/2007 09:53	

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General Bench Analysis - Quality Control

Batch/Sample/Analyte	Result	Detection Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
BATCH: Batch 7E21012 - General Preparation										
QC SAMPLE: Duplicate (7E21012-DUP1)				Source: 7052101-01	Prepared & Analyzed: 05/21/07					
pH	6.92		SU		6.89			0.434	10	
TEMPERATURE (C)	17.3		"		17.3			0.00	200	
QC SAMPLE: Reference (7E21012-SRM1)					Prepared & Analyzed: 05/21/07					
pH	4.98		SU	5.00		99.6	97.5-102.			
QC SAMPLE: Reference (7E21012-SRM2)					Prepared & Analyzed: 05/21/07					
pH	8.02		SU	8.00		100	97.5-102.			
QC SAMPLE: Reference (7E21012-SRM3)					Prepared & Analyzed: 05/21/07					
pH	8.03		SU	8.00		100	97.5-102.			
BATCH: Batch 7E22004 - Water Extraction										
QC SAMPLE: Blank (7E22004-BLK1)					Prepared & Analyzed: 05/22/07					
TOTAL OIL AND GREASE	ND	2.0	mg/L							
QC SAMPLE: LCS (7E22004-BS1)					Prepared & Analyzed: 05/22/07					
TOTAL OIL AND GREASE	37.8	2.0	mg/L	43.0		87.9	79-114			
QC SAMPLE: LCS Dup (7E22004-BSD1)					Prepared & Analyzed: 05/22/07					
TOTAL OIL AND GREASE	37.7	2.0	mg/L	43.0		87.7	79-114	0.265	18	
BATCH: Batch 7E24009 - General Preparation										
QC SAMPLE: Blank (7E24009-BLK1)					Prepared & Analyzed: 05/24/07					
TOTAL SUSPENDED SOLIDS	ND	5.00	mg/L							

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General Bench Analysis - Quality Control

Batch/Sample/Analyte	Result	Detection Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
BATCH: Batch 7E24009 - General Preparation										
QC SAMPLE: Duplicate (7E24009-DUP1)					**Source: 7052203-01**	**Prepared & Analyzed: 05/24/07**				
TOTAL SUSPENDED SOLIDS	392	5.00	mg/L		368			6.32	20	
QC SAMPLE: Reference (7E24009-SRM1)						**Prepared & Analyzed: 05/24/07**				
TOTAL SUSPENDED SOLIDS	30.0	5.00	mg/L	27.6		109	80-120			

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Total Metals by Inductively Coupled Plasma - Quality Control

Batch/Sample/Analyte	Result	Detection Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
BATCH: Batch 7E23005 - ***Metals Prep***										
QC SAMPLE: Blank (7E23005-BLK1)					Prepared & Analyzed: 05/23/07					
COPPER	ND	0.004	mg/L							
LEAD	ND	0.004	"							
ZINC	ND	0.003	"							
QC SAMPLE: Calibration Blank (7E23005-CCB1)					Prepared & Analyzed: 05/23/07					
COPPER	ND	0.004	mg/L							
LEAD	ND	0.004	"							
ZINC	ND	0.003	"							
QC SAMPLE: Calibration Blank (7E23005-CCB2)					Prepared & Analyzed: 05/23/07					
COPPER	ND	0.004	mg/L							
LEAD	ND	0.004	"							
ZINC	ND	0.003	"							
QC SAMPLE: Calibration Blank (7E23005-CCB3)					Prepared & Analyzed: 05/23/07					
COPPER	ND	0.004	mg/L							
LEAD	ND	0.004	"							
ZINC	ND	0.003	"							
QC SAMPLE: Reference (7E23005-SRM1)					Prepared & Analyzed: 05/23/07					
COPPER	1.02	0.004	mg/L	1.00		102	85-115			
LEAD	1.01	0.004	"	1.00		101	85-115			
ZINC	1.06	0.003	"	1.00		106	85-115			
QC SAMPLE: Reference (7E23005-SRM2)					Prepared & Analyzed: 05/23/07					
COPPER	1.02	0.004	mg/L	1.00		102	85-115			
LEAD	0.920	0.004	"	1.00		92.0	85-115			
ZINC	0.922	0.003	"	1.00		92.2	85-115			

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Total Metals by Inductively Coupled Plasma - Quality Control

Batch/Sample/Analyte	Result	Detection Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
BATCH: Batch 7E23005 - ***Metals Prep***										
QC SAMPLE: Reference (7E23005-SRM3)					Prepared & Analyzed: 05/23/07					
COPPER	1.04	0.004	mg/L	1.00		104	85-115			
LEAD	1.02	0.004	"	1.00		102	85-115			
ZINC	1.11	0.003	"	1.00		111	85-115			

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☐ 4592 E 2nd Street, Ste 'A', Benicia, CA 94510 — Ph: (707) 748-7587 Fax: (707) 748-7764
☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: Schnitzer Steel - Portland
Attention: Jim Jakubiak
Address: P.O. Box 10047 - Portland, OR
Phone: (503) 286-6996
Fax:
Sampler: [signature] ☒ Submitted

Project Name:
Project Number:
P.O. Number:
Testing Priority: ☒ Normal ☐ Rush
Due Date:
Notification Method(s): ☐ Telephone ☐ Email ☐ Mail

Analysis To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	Total Metals Cu/Pb/Zn EPA Method 6	TSS EPA 160.2	Oil & Grease EPA 413.1	pH EPA 150.1
#6		Water	5-20-07	0830	x	x	x	x
#13		Water	5-20-07	0905	x	x	x	x
#14		Water	5-20-07	0908	x	x	x	x
#20		Water	5-20-07	0842	x	x	x	x

205

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	5-21-07 1500	Charles Morrow	5-21-07 1500
Relinquished By:	Date/Time	Received By:	Date/Time

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Inspection Job Number:
PO#
Laboratory Project Number: 705205
Cash/check #
Due Date: 5/31/07
Amount Paid: $

SCHN00246155

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CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 05/21/07 15:00

REPORT DATE: 05/29/07 09:39 REPORT NUMBER: 7052105

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
7052105-01	Stormwater #6	05/21/2007	0830	Water
7052105-02	Stormwater #13	05/21/2007	0905	Water
7052105-03	Stormwater #14	05/21/2007	0908	Water
7052105-04	Stormwater #20	05/21/2007	0842	Water

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME	NOTES
7052105-01	**SAMPLE ID: Stormwater #6**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.2	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.62	SU		DAU	05/21/2007 15:50	
		TEMPERATURE (C)	18.7	SU				
SUSPENDED SO[illegible]	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	48.0	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.007	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.072	mg/L	0.003	KEL	05/23/2007 09:53	
7052105-02	**SAMPLE ID: Stormwater #13**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.5	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.46	SU		DAU	05/21/2007 15:50	
		TEMPERATURE (C)	18.7	SU				
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	15.0	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.047	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	0.040	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.20	mg/L	0.003	KEL	05/23/2007 09:53	
7052105-03	**SAMPLE ID: Stormwater #14**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	6.2	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.88	SU		DAU	05/21/2007 15:50	

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Charles Morrow - Laboratory Director

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SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME	NOTES
7052105-03	**SAMPLE ID: Stormwater #14**							
General Bench Analysis								
PH	EPA 150.1/9040	TEMPERATURE (C)	18.9	SU		DAU	05/21/2007 15:50	
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	48.0	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.011	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.035	mg/L	0.003	KEL	05/23/2007 09:53	
7052105-04	**SAMPLE ID: Stormwater #20**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.31	SU		DAU	05/21/2007 15:50	
		TEMPERATURE (C)	18.8	SU				
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	8.00	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.048	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	0.017	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.21	mg/L	0.003	KEL	05/23/2007 09:53	

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General Bench Analysis - Quality Control

Batch/Sample/Analyte	Result	Detection Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
BATCH: Batch 7E21012 - General Preparation										
QC SAMPLE: Duplicate (7E21012-DUP1)				Source: 7052101-01	Prepared & Analyzed: 05/21/07					
pH	6.92		SU		6.89			0.434	10	
TEMPERATURE (C)	17.3		"		17.3			0.00	200	
QC SAMPLE: Reference (7E21012-SRM1)					Prepared & Analyzed: 05/21/07					
pH	4.98		SU	5.00		99.6	97.5-102.			
QC SAMPLE: Reference (7E21012-SRM2)					Prepared & Analyzed: 05/21/07					
pH	8.02		SU	8.00		100	97.5-102.			
QC SAMPLE: Reference (7E21012-SRM3)					Prepared & Analyzed: 05/21/07					
pH	8.03		SU	8.00		100	97.5-102.			
BATCH: Batch 7E22004 - Water Extraction										
QC SAMPLE: Blank (7E22004-BLK1)					Prepared & Analyzed: 05/22/07					
TOTAL OIL AND GREASE	ND	2.0	mg/L							
QC SAMPLE: LCS (7E22004-BS1)					Prepared & Analyzed: 05/22/07					
TOTAL OIL AND GREASE	37.8	2.0	mg/L	43.0		87.9	79-114			
QC SAMPLE: LCS Dup (7E22004-BSD1)					Prepared & Analyzed: 05/22/07					
TOTAL OIL AND GREASE	37.7	2.0	mg/L	43.0		87.7	79-114	0.265	18	
BA[illegible]: Batch 7E24009 - General Preparation										
QC SAMPLE: Blank (7E24009-BLK1)					Prepared & Analyzed: 05/24/07					
TOTAL SUSPENDED SOLIDS	ND	5.00	mg/L							

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General Bench Analysis - Quality Control

Batch/Sample/Analyte	Result	Detection Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
BATCH: Batch 7E24009 - General Preparation										
QC SAMPLE: Duplicate (7E24009-DUP1)					**Source: 7052203-01**	**Prepared & Analyzed: 05/24/07**				
TOTAL SUSPENDED SOLIDS	392	5.00	mg/L		368			6.32	20	
QC SAMPLE: Reference (7E24009-SRM1)						**Prepared & Analyzed: 05/24/07**				
TOTAL SUSPENDED SOLIDS	30.0	5.00	mg/L	27.6		109	80-120			

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Total Metals by Inductively Coupled Plasma - Quality Control

Batch/Sample/Analyte	Result	Detection Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
BATCH: Batch 7E23005 - ***Metals Prep***										
QC SAMPLE: Blank (7E23005-BLK1)					Prepared & Analyzed: 05/23/07					
COPPER	ND	0.004	mg/L							
LEAD	ND	0.004	"							
ZINC	ND	0.003	"							
QC SAMPLE: Calibration Blank (7E23005-CCB1)					Prepared & Analyzed: 05/23/07					
COPPER	ND	0.004	mg/L							
LEAD	ND	0.004	"							
ZINC	ND	0.003	"							
QC SAMPLE: Calibration Blank (7E23005-CCB2)					Prepared & Analyzed: 05/23/07					
COPPER	ND	0.004	mg/L							
LEAD	ND	0.004	"							
ZINC	ND	0.003	"							
QC SAMPLE: Calibration Blank (7E23005-CCB3)					Prepared & Analyzed: 05/23/07					
COPPER	ND	0.004	mg/L							
LEAD	ND	0.004	"							
ZINC	ND	0.003	"							
QC SAMPLE: Reference (7E23005-SRM1)					Prepared & Analyzed: 05/23/07					
COPPER	1.02	0.004	mg/L	1.00		102	85-115			
LEAD	1.01	0.004	"	1.00		101	85-115			
ZINC	1.06	0.003	"	1.00		106	85-115			
QC SAMPLE: Reference (7E23005-SRM2)					Prepared & Analyzed: 05/23/07					
COPPER	1.02	0.004	mg/L	1.00		102	85-115			
LEAD	0.920	0.004	"	1.00		92.0	85-115			
ZINC	0.922	0.003	"	1.00		92.2	85-115			

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Total Metals by Inductively Coupled Plasma - Quality Control

Batch/Sample/Analyte	Result	Detection Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
BATCH: Batch 7E23005 - ***Metals Prep***										
QC SAMPLE: Reference (7E23005-SRM3)					Prepared & Analyzed: 05/23/07					
COPPER	1.04	0.004	mg/L	1.00		104	85-115			
LEAD	1.02	0.004	"	1.00		102	85-115			
ZINC	1.11	0.003	"	1.00		111	85-115			

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☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: Schnitzer Steel - Portland
Attention: Jim Jakubiak
Address: P.O. Box 10047 · Portland, OR
Phone: (503) 286-6976
Fax:
Sampler: [signature] ☒ Submitted

Project Name:
Project Number:
P.O. Number:
Testing Priority: ☒ Normal ☐ Rush
Notification Method(s): ☐ Telephone ☐ Email ☐ Mail
Due Date:

Analysis To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	Total Metals Cu/Pb/Zn EPA Method	TSS EPA 160.2	Oil & Grease EPA 413.1	pH EPA 150.1
#6		Water	5-20-07	0830	X	X	X	X
#13		Water	5-20-07	0905	X	X	X	X
#14		Water	5-20-07	0908	X	X	X	X
#20		Water	5-20-07	0842	X	X	X	X

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	5-21-07 1500	Charles Morrow	5-21-07 1500
Relinquished By:	Date/Time	Received By:	Date/Time

FOR LABORATORY USE ONLY

Inspection Job Number: _____ PO# _____
Laboratory Project Number: _____ Cash/check # _____
Due Date: _____ Amount Paid: $ _____

SCHN00246162

Sample Acceptance Policy

All samples must meet the following requirements:

- **Chain of Custody:** The COC list of samples must match the number and type of sample containers received, and sample descriptions on the COC must match the sample bottles. The requested tests and where possible, specific methods are shown on the COC.
- **Appropriate Container:** The correct sample containers must be used for the requested analyses.
- **Sample Volume:** There must be sufficient sample volume for the test(s) requested.
- **Holding Time:** The holding times for the requested analyses must not be expired.

Environmental samples must meet the following additional requirements:

- **Sample Temperature:** Samples that require refrigeration shall be considered acceptable if the temperature as measured upon receipt is either within 2° C of the required temperature or the method specified range. For samples with a specified temperature of 4° C, samples received at temperatures ranging from just above freezing to 6° C shall be acceptable.

  NOTE: **Samples that are delivered to the laboratory shortly after sampling may not meet this criterion. However, the samples shall be considered acceptable if there is evidence that the chilling process has begun such as arrival on ice, or if the samples were taken within the hour.**

- **Sample Preservation:** Where possible without sacrificing the integrity of the sample, determine whether the sample bottle has been preserved correctly.

Discrepancies:

If there is any doubt as to the suitability for testing such as the **sample does not conform to the sample description**, the sample containers are **damaged**, **leaking**, or **may be contaminated from other damaged or leaking sample containers**, or where **testing is not specified**, further instructions from the client are required. If the issue cannot be resolved and the sample does not meet sample acceptance criteria the laboratory shall either.

- Fully document any decision to proceed with the analysis and note the condition of the sample on the COC and work order; or
- Retain correspondence and/or records of conversations regarding the final disposition of rejected samples.

Rejected Samples:

- Should the client choose to proceed with testing on questionable samples, the Work Order must be clearly marked with the nature of the problem so that the final report data may be appropriately qualified.
- Rejected samples must still be logged into LIMS to obtain a unique sample identification number to track sample disposition. However, for rejected samples, no testing is assigned. Instead, the sample status is set to "Rejected" by editing the work order status using the Update Status function of the Laboratory menu in LIMS.

Refer to the Columbia Inspection, Inc. Laboratory Policy, LP00.01, Sample Acceptance Policy and SOP15.01 Sample Receipt for complete details.

Sample Disposal:

- Samples are disposed of after 45 days unless prior arrangements have been made with the laboratory.
- Samples that are deemed hazardous may be returned to the client for proper disposal.

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 11/30/06 15:05

REPORT DATE: 12/13/06 00:48 **REPORT NUMBER:** 6113005

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
6113005-01	Stormwater #1	11/30/2006	0830	Water
6113005-02	Stormwater #6	11/30/2006	0450	Water
6113005-03	Stormwater #13	11/30/2006	0520	Water
6113005-04	Stormwater #14	11/30/2006	0515	Water
6113005-05	Stormwater #20	11/30/2006	0630	Water

ORIGINAL

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
6113005-01	**SAMPLE ID: Stormwater #1**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	12.5	mg/L	2.0	JRW	12/11/2006 14:07
PH	EPA 150.1/9040	pH	7.92	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.8	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	320	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.16	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.375	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	1.5	mg/L	0.003	KEL	12/01/2006 14:56
6 05-02	**SAMPLE ID: Stormwater #6**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	7.4	mg/L	2.0	JRW	12/12/2006 13:15
PH	EPA 150.1/9040	pH	7.80	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.5	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	5.0	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.005	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.023	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.045	mg/L	0.003	KEL	12/01/2006 14:56
6113005-03	**SAMPLE ID: Stormwater #13**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	6.9	mg/L	2.0	JRW	12/12/2006 15:31
PH	EPA 150.1/9040	pH	8.98	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.5	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	190	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.11	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.177	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.61	mg/L	0.003	KEL	12/01/2006 14:56
6113005-04	**SAMPLE ID: Stormwater #14**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2.3	mg/L	2.0	JRW	12/12/2006 15:31
PH	EPA 150.1/9040	pH	8.85	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.1	SU			

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Charles Morrow - Laboratory Director

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CI CERTIFICATE OF ANALYSIS

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
6113005-04	**SAMPLE ID: Stormwater #14**						
General Bench Analysis							
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	150	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.13	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.255	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.74	mg/L	0.003	KEL	12/01/2006 14:56
6113005-05	**SAMPLE ID: Stormwater #20**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/12/2006 15:31
PH	EPA 150.1/9040	pH	7.23	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.4	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	63	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.056	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.060	mg/L	0.003	KEL	12/01/2006 14:56

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Authorized for Release By:Charles Morrow - Laboratory Director

COLUMBIA INSPECTION, INC 7133 N. Lombard, Portland, OR 97203 Ph:(503) 286-9464 Fax:(503) 286-5355 E-mail:cilabqa@ColumbiaInspection.com

COLUMBIA INSPECTION, INC.

CHAIN OF CUSTODY RECORD
AND
NON-COMMERCIAL BILL OF LADING

☒ 7133 N. Lombard, Portland, OR 97203 — Ph: (503) 286-9464 Fax: (503) 285-7831
☐ 4901 E. 20th Street, Fife, WA 98424 — Ph: (253) 922-8781 Fax: (253) 922-8957
☐ 4592 E 2nd Street, Ste 'A', Benicia, CA 94510 — Ph: (707) 748-7587 Fax: (707) 748-7764
☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: [illegible] Steel Portland
Attention: [illegible]
Address: [illegible] Box 10047 [illegible]
Phone: [illegible] 97296 0047
Fax: (503) 286 [illegible]
Sampler: [illegible] ☐ Submitted

Project Name: [illegible]
Project Number:
P.O. Number:

Testing Priority: ☒ Normal ☐ Rush
Due Date:

Notification Method(s): ☐ Telephone ☐ Email ☐ Mail

Analysis To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	Total Metals (Cu, Pb, Zn, EPA 6000/6010 Analysis)	TSS EPA 160.2	Silt Grease EPA 413.1	pH EPA 150.1
#1		Water	11-30-06	830	X	X	X	X
#6		Water	11-30-06	450	X	X	X	X
#13		Water	11-30-06	520	X	X	X	X
#14		Water	11-30-06	515	X	X	X	X
#20		Water	11-30-06	0630	X	X	X	X

Relinquished By:	Date/Time	Received By:	Date/Time
[illegible]	11-30-06 2:45PM	[illegible]	11/30/06 1505
Relinquished By:	Date/Time	Received By:	Date/Time

FOR LABORATORY USE ONLY

Inspection Job Number: _____ PO# _____
Laboratory Project Number: _____ Cash/check # _____
Due Date: _____ Amount Paid: $ _____

SCHN00246166

Sample Acceptance Policy

All samples must meet the following requirements:

- **Chain of Custody:** The COC list of samples must match the number and type of sample containers received, and sample descriptions on the COC must match the sample bottles. The requested tests and where possible, specific methods are shown on the COC.
- **Appropriate Container:** The correct sample containers must be used for the requested analyses.
- **Sample Volume:** There must be sufficient sample volume for the test(s) requested.
- **Holding Time:** The holding times for the requested analyses must not be expired.

Environmental samples must meet the following additional requirements:

- **Sample Temperature:** Samples that require refrigeration shall be considered acceptable if the temperature as measured upon receipt is either within 2° C of the required temperature or the method specified range. For samples with a specified temperature of 4° C, samples received at temperatures ranging from just above freezing to 6° C shall be acceptable.

  NOTE: **Samples that are delivered to the laboratory shortly after sampling may not meet this criterion. However, the samples shall be considered acceptable if there is evidence that the chilling process has begun such as arrival on ice, or if the samples were taken within the hour.**

- **Sample Preservation:** Where possible without sacrificing the integrity of the sample, determine whether the sample bottle has been preserved correctly.

Discrepancies:

If there is any doubt as to the suitability for testing such as the **sample does not conform to the sample description**, the sample containers are **damaged, leaking**, or **may be contaminated from other damaged or leaking sample containers**, or where **testing is not specified**, further instructions from the client are required. If the issue cannot be resolved and the sample does not meet sample acceptance criteria the laboratory shall either.

- Fully document any decision to proceed with the analysis and note the condition of the sample on the COC and work order; or
- Retain correspondence and/or records of conversations regarding the final disposition of rejected samples.

Rejected Samples:

- Should the client choose to proceed with testing on questionable samples, the Work Order must be clearly marked with the nature of the problem so that the final report data may be appropriately qualified.
- Rejected samples must still be logged into LIMS to obtain a unique sample identification number to track sample disposition. However, for rejected samples, no testing is assigned. Instead, the sample status is set to "Rejected" by editing the work order status using the Update Status function of the Laboratory menu in LIMS.

Refer to the Columbia Inspection, Inc. Laboratory Policy, LP00.01, Sample Acceptance Policy and SOP15.01 Sample Receipt for complete details.

Sample Disposal:

- Samples are disposed of after 45 days unless prior arrangements have been made with the laboratory.
- Samples that are deemed hazardous may be returned to the client for proper disposal.

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PROJECT NAME: 1200Z Stormwater Test

PHONE: (503) 286-6976
FAX: (503) 286-6948

SUBMITTED: 11/30/06 15:05

REPORT DATE: 12/13/06 00:48 **REPORT NUMBER:** 6113005

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
6113005-01	Stormwater #1	11/30/2006	0830	Water
6113005-02	Stormwater #6	11/30/2006	0450	Water
6113005-03	Stormwater #13	11/30/2006	0520	Water
6113005-04	Stormwater #14	11/30/2006	0515	Water
6113005-05	Stormwater #20	11/30/2006	0630	Water

COPY

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
6113005-01	**SAMPLE ID: Stormwater #1**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	12.5	mg/L	2.0	JRW	12/11/2006 14:07
PH	EPA 150.1/9040	pH	7.92	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.8	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	320	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.16	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.375	mg/L	0.005	KEL	12/01/2006 14:56
ZIN[illegible] ICP		ZINC	1.5	mg/L	0.003	KEL	12/01/2006 14:56
61[illegible]J5-02	**SAMPLE ID: Stormwater #6**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	7.4	mg/L	2.0	JRW	12/12/2006 13:15
PH	EPA 150.1/9040	pH	7.80	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.5	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	5.0	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.005	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.023	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.045	mg/L	0.003	KEL	12/01/2006 14:56
6113005-03	**SAMPLE ID: Stormwater #13**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	6.9	mg/L	2.0	JRW	12/12/2006 15:31
PH	EPA 150.1/9040	pH	8.98	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.5	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	190	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.11	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.177	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.61	mg/L	0.003	KEL	12/01/2006 14:56
6113005-04	**SAMPLE ID: Stormwater #14**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2.3	mg/L	2.0	JRW	12/12/2006 15:31
PH	EPA 150.1/9040	pH	8.85	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.1	SU			

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Authorized for Release By: Charles Morrow
Charles Morrow - Laboratory Director

COLUMBIA INSPECTION, INC 7133 N. Lombard, Portland, OR 97203 Ph:(503) 286-9464 Fax:(503) 286-5355 E-mail:cilabqa@ColumbiaInspection.com

CI CERTIFICATE OF ANALYSIS

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
6113005-04	**SAMPLE ID: Stormwater #14**						
General Bench Analysis							
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	150	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.13	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.255	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.74	mg/L	0.003	KEL	12/01/2006 14:56
6113005-05	**SAMPLE ID: Stormwater #20**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/12/2006 15:31
PH	EPA 150.1/9040	pH	7.23	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.4	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	53	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.056	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.060	mg/L	0.003	KEL	12/01/2006 14:56

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Authorized for Release By:Charles Morrow - Laboratory Director

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COLUMBIA INSPECTION, INC.

U.S Customs & Border Protection Approved Gaugers
Petroleum and Environmental Laboratory
Tank Calibrations

INVOICE

Invoice Number: 5612088 **Invoice Date:** 12/13/06

366-A
TO: James Jakubiak
Schnitzer Steel
P.O. BOX 10047
Portland, OR 97296

Received
11/30/06

Client
Schnitzer Steel

Project
1200Z Stormwater Test

Work Order(s)
6113005

Comments

Project Number
[none]

PO Number
NA

QUANTITY	ANALYSIS/DESCRIPTION	MATRIX	UNIT COST	EXTENDED COST
5	COPPER - ICP [8 day]	Water	$10.00	$50.00
5	DIGESTION - 3015 [8 day]	Water	$10.00	$50.00
5	LEAD - ICP [8 day]	Water	$10.00	$50.00
5	O & G, TOTAL (HEM) [8 day]	Water	$30.00	$150.00
5	PH [8 day]	Water	$10.00	$50.00
5	SUSPENDED SOLIDS [8 day]	Water	$15.00	$75.00
5	ZINC - ICP [8 day]	Water	$10.00	$50.00

Invoice Total: **$475.00**

Approved: James L Jakubiak
Date: 1-14-07
Project: SW Sample Analysis

ORIGINAL

COLUMBIA INSPECTION, INC 7133 N. Lombard, Portland, OR 97203 Phone:(503) 286-9464 Fax:(503) 286-5355 E-mail:lab@ColumbiaInspection.

All work performed is subject to the terms and conditions of our current schedule of rates. Liability is limited to the amount of this

Terms - Net 15 Days

Thank you for doing business with Columbia Inspection

Please state invoice number and remit to:
Columbia Inspection, Inc.
PO Box 83569, St. Johns Station
Portland, OR 97283

COLUMBIA INSPECTION, INC.

U.S Customs & Border Protection Approved Gaugers
Petroleum and Environmental Laboratory
Tank Calibrations

Invoice Number: 5612088

Client
Schnitzer Steel

Work Order(s)
6113005

Project Number
[none]

PO Number
NA

366-A

TO: James Jakubiak
Schnitzer Steel
P.O. BOX 10047
Portland, OR 97296

Jim,

Rechecked calculations for.
Stormwater #1
#6
#13
#14
#20.

Calculations were correct for each sample.

Thank you,
Charles Morris

SCHNITZER STEEL PRODUCTS CO.
12005 N Burgard Road, Portland, Oregon 97203
P.O. Box 10047, Portland, Oregon 97296-0047
(503) 224-9900 FAX (503) 286-6948

July 7, 2007

Mr. Dennis Jurries
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201-4987

Re: Storm Water Monitoring Results for 2006-2007 Permit #1200-Z, File #108103

Dear Mr. Jurries:

The tabulated storm water analytical data for the Schnitzer Steel Product's Co.'s facility located at 12005 North Burgard Road in Portland is attached. During the past year Schnitzer Steel collected stormwater samples from outfalls on November 30, 2006 and May 20, 2007. Results of the laboratory analyses are summarized in Table 1 and provided in attached laboratory reports.

We continue to implement Best Management Practices (BMPs) as outlined in our updated Stormwater Pollution Control Plan. Schnitzer continues to improve and enhance maintenance of existing treatment systems. We are also evaluating additional structural BMPs and storm water treatment technologies for inclusion and adoption into our overall site stormwater program. We have recently had a stormwater inspection by the City of Portland Bureau of Environmental Services division and are in the process of implementing their recommendations.

Schnitzer continues to improve facility storm water quality as our Portland facility is upgraded with new equipment and structures. In 2006, Schnitzer completed a new dock at Berth 1 along with a newly refurbished container crane. As part of this project all storm water was contained and conveyed to the nearby sand filter system. In the past year we have installed a new closed loop storm water/process water treatment system in the central portion of the facility (Basins 4A and 4B) as part of the installation of the new metal shredder. All the precipitation in the approximate 4.4 acres of land where the new shredder was installed will be contained, treated, and recycled. Schnitzer has also permanently abandoned Outfall #2 and has taken Outfall 1 off-line. Stormwater previously discharging from these locations is captured and re-used on-site for make-up water for on-going facility processes.

Please contact me at (503) 286-6976 if you have questions.

Sincerely,
Schnitzer Steel Products Co.

Jim Jakubiak
Environmental Administrator

Attachments: Discharge Monitoring Report
Laboratory Reports

NPDES 1200-Z General Permit for Storm Water Runoff
Discharge Monitoring Report

Complete report and send once a year by July 15 to:
Oregon DEQ

Legal Name: Schnitzer Steel Products Co.

Site/File ID #: 108103

Common Name: SCHNITZER STEEL

County: Multnomah

Facility Location: 12005 N. Burgard Road
Portland, OR. 97203

Reporting period: July 1, 2006 to June 30, 2007

Twice a Year Sampling

Monitor for the following pollutants at the monitoring points specified in your Storm Water Pollution Control Plan (SWPCP). Add more sheets if you have more than three monitoring points.

(See Attached Table)

Pollutant Sample 2/Year, Each Monitoring Point[1]	Date of Sample	Monitoring Points #	#	#
Total copper – If value exceeds 0.1 mg/l, review/revision of SWPCP required				
Total lead – If value exceeds 0.4 mg/l, review/revision of SWPCP required				
Total zinc – If value exceeds 0.6 mg/l, review/revision of SWPCP required				
pH – If value is outside of 5.5 to 9.0 S.U., review/revision of SWPCP required[2]				
Total suspended solids – If value exceeds 130 mg/l, review/revision of SWPCP required[2]				
Oil and grease– If value exceeds 10 mg/l, review/revision of SWPCP required[2]				
E. coli – If value exceeds 406 counts/100 ml, review/revision of SWPCP required. Only applies to landfills accepting septage/biosolids and sewage treatment plants.				

See reverse side for additional visual monitoring and signature for report.

[1] itoring frequency may be reduced under some circumstances – refer to page 10 of your permit. If monitoring requirements have been waived, please write in "WAIVED" for that pollutant.
[2] Separate effluent limits for these pollutants apply for coal fired power plants, cement plants, and/or roofing or asphalt paving operations.

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
1*	11/30/2006	7.92	320	12.5	0.16	0.375	1.5
6	11/30/2006	7.80	5.0	7.4	0.005	0.023	0.045
	5/20/2007	7.62	48	3.0	0.007	ND	0.072
13	11/30/2006	8.98	190	6.9	0.11	0.177	0.61
	5/20/2007	7.46	15.0	3.5	0.047	0.040	0.20
14	11/30/2006	8.85	150.0	2.3	0.13	0.255	0.74
	5/20/2007	7.88	48.0	6.2	0.011	ND	0.035
20	11/30/2006	7.23	53	ND	ND	0.056	0.06
	5/20/2007	7.31	8.00	ND	0.048	0.017	0.21

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field and in laboratory. Lab data presented in table.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

*Outfall #1 system pumps were turned on for sampling purposes because previous agency comments required samples be collected from the offline system.

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 05/21/07 15:00

REPORT DATE: 05/29/07 09:39 REPORT NUMBER: 7052105

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
7052105-01	Stormwater #6	05/21/2007	0830	Water
7052105-02	Stormwater #13	05/21/2007	0905	Water
7052105-03	Stormwater #14	05/21/2007	0908	Water
7052105-04	Stormwater #20	05/21/2007	0842	Water

5/21/07 9:19

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME	NOTES
7052105-01	**SAMPLE ID: Stormwater #6**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.2	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.62	SU		DAU	05/21/2007 15:50	
		TEMPERATURE (C)	18.7	SU				
SUS DED SOL	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	48.0	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.007	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.072	mg/L	0.003	KEL	05/23/2007 09:53	
7052105-02	**SAMPLE ID: Stormwater #13**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.5	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.46	SU		DAU	05/21/2007 15:50	
		TEMPERATURE (C)	18.7	SU				
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	15.0	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.047	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	0.040	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.20	mg/L	0.003	KEL	05/23/2007 09:53	
7052105-03	**SAMPLE ID: Stormwater #14**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	6.2	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.88	SU		DAU	05/21/2007 15:50	

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Charles Morrow - Laboratory Director

COLUMBIA INSPECTION, INC 7133 N. Lombard, Portland, OR 97203 Ph:(503) 286-3454 Fax:(503) 286-5355 E-mail:pilabqa@Columbiainspection.com

CI CERTIFICATE OF ANALYSIS

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME	NOTES
7052105-03	**SAMPLE ID: Stormwater #14**							
General Bench Analysis								
PH	EPA 150.1/9040	TEMPERATURE (C)	18.9	SU		DAU	05/21/2007 15:50	
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	48.0	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.011	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.035	mg/L	0.003	KEL	05/23/2007 09:53	
7052105-04	**SAMPLE ID: Stormwater #20**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.31	SU		DAU	05/21/2007 15:50	
		TEMPERATURE (C)	18.8	SU				
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	8.00	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.048	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	0.017	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.21	mg/L	0.003	KEL	05/23/2007 09:53	

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☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: Schnitzer Steel - Portland
Attention: Jim Jakubiak
Address: P.O. Box 10047 - Portland, OR
Phone: (503) 286-6996
Fax:
Sampler: [signature] ☒ Submitted

Project Name:
Project Number:
P.O. Number:
Testing Priority: ☒ Normal ☐ Rush
Due Date:
Notification Method(s): ☐ Telephone ☐ Email ☐ Mail

Analysis To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	Total Metals Cu/Pb/Zn EPA 6010	TSS EPA 160.2	Oil & Grease EPA 413.1	pH EPA 150.1
#6		Water	5-20-07	0830	X	X	X	X
#13		Water	5-20-07	0905	X	X	X	X
#14		Water	5-20-07	0908	X	X	X	X
#20		Water	5-20-07	0842	X	X	X	X

(20) 5

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[signature]	5-21-07 1500	Charles Morrow	5-21-07 1500
Relinquished By:	Date/Time	Received By:	Date/Time

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Inspection Job Number:
PO#
Laboratory Project Number: 705205
Cash/check #
Due Date: 5/31/07
Amount Paid: $

SCHN00246181

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PROJECT NAME: 1200Z Stormwater Test

PHONE: (503) 286-6976
FAX: (503) 286-6948

SUBMITTED: 11/30/06 15:05

REPORT DATE: 12/13/06 00:48 **REPORT NUMBER:** 6113005

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
6113005-01	Stormwater #1	11/30/2006	0830	Water
6113005-02	Stormwater #6	11/30/2006	0450	Water
6113005-03	Stormwater #13	11/30/2006	0520	Water
6113005-04	Stormwater #14	11/30/2006	0515	Water
6113005-05	Stormwater #20	11/30/2006	0630	Water

ORIGINAL

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
6113005-01	**SAMPLE ID: Stormwater #1**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	12.5	mg/L	2.0	JRW	12/11/2006 14:07
PH	EPA 150.1/9040	pH	7.92	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.8	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	320	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.16	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.375	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	1.5	mg/L	0.003	KEL	12/01/2006 14:56
61 5-02	**SAMPLE ID: Stormwater #6**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	7.4	mg/L	2.0	JRW	12/12/2006 13:15
PH	EPA 150.1/9040	pH	7.80	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.5	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	5.0	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.005	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.023	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.045	mg/L	0.003	KEL	12/01/2006 14:56
6113005-03	**SAMPLE ID: Stormwater #13**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	6.9	mg/L	2.0	JRW	12/12/2006 15:31
PH	EPA 150.1/9040	pH	8.98	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.5	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	190	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.11	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.177	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.61	mg/L	0.003	KEL	12/01/2006 14:56
6113005-04	**SAMPLE ID: Stormwater #14**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2.3	mg/L	2.0	JRW	12/12/2006 15:31
PH	EPA 150.1/9040	pH	8.85	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.1	SU			

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SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
6113005-04	**SAMPLE ID: Stormwater #14**						
General Bench Analysis							
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	150	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.13	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.255	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.74	mg/L	0.003	KEL	12/01/2006 14:56
6113005-05	**SAMPLE ID: Stormwater #20**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/12/2006 15:31
PH	EPA 150.1/9040	pH	7.23	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.4	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	53	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.056	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.060	mg/L	0.003	KEL	12/01/2006 14:56

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☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: [illegible]
Attention: [illegible]
Address: [illegible]
Phone: [illegible]
Fax: [illegible]
Sampler: [illegible] ☐ Submitted

Project Name: [illegible]
Project Number:
P.O. Number:
Testing Priority: ☒ Normal ☐ Rush
Notification Method(s): ☐ Telephone ☐ Email ☐ Mail
Due Date:

Analysis To Be Performed: [illegible] Pb, Zn, Cu, Ni, Cd, Cr, Hg, Ag, Se, As, Sb, Tl, Be, Cl, Cyanide, Hardness, Hg EPA 1631

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	[illegible]	Pb EPA 1632	Cl, Cyanide, Hardness	Hg EPA 1631									
#1		Water	11-30-06	2:10	X	X	X	X									
#2		Water	11-30-06	4:00	X	X	X	X									
#3		Water	11-30-06	3:20	X	X	X	X									
#4		Water	11-30-06	2:15	X	X	X	X									
#20		Water	11-30-06	9:30	X	X	X	X									

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[illegible]	[illegible] 2:15PM	[illegible]	11/30/06 19:05
Relinquished By:	Date/Time	Received By:	Date/Time

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Due Date: _____ Amount Paid: $ _____

SCHN00246184

Schnitzer Steel Industries, Inc.

Transmittal

To: Timothy Dean, City of Portland

From: Jim Jakubiak, SSI **Date:** 7/8/2007

Re: Annual Storm Water Monitoring Data

CC: Mat Cusma, Tom Zelenka

☐ **Urgent** ☑ **For Use** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

Attached is a copy of the 2006 and 2007 stormwater monitoring data for Schnitzer Steel's facility in Portland, Oregon. Included in the submittal are the monitoring results and the Monitoring Report Form. Please contact me at (503) 286-6976 if you have questions or comments.

City of Portland
Environment Services
Industrial Stormwater

INDUSTRIAL STORMWATER PROGRAM
NPDES 1200-Z MONITORING REPORT

Industry Name: SCHNITZER STEEL INTERNATIONAL
Site Address: PO BOX 10047

The Permittee shall monitor stormwater **twice** per year (October – December) and (January – April for the parameters outlined in their NPDES 1200-Z Stormwater discharge Permit Schedule B.1.a. The Permittee shall perform visual observations on a **monthly** basis as outlined in Schedule B of the Permit. The Permittee shall submit monitoring data results to the City and the DEQ as stated in Schedule D.2.

Stormwater samples were taken for the above Permittee, on these days and at these sample points:

Sampling Dates	Sampling Points
November 30, 2006	Outfalls 1, 6, 13, 14, 20
May 20, 2007	Outfalls 6, 13, 14, 20

The Permittee shall submit by **July 15** of each year a copy of the **laboratory analysis reports**, which show analytical methods and detection limits, for stormwater samples collected for the previous monitoring year (July 1-June 30).

☐ **Monitoring Waiver Reduction Notification:**

Check the box if your facility is exercising a waiver of monitoring based on meeting benchmarks listed in Schedule A.9, AND site conditions have not changed to impact stormwater runoff. Note: This does not exclude your facility from notifying DEQ about the waiver of monitoring. Please read Schedule B of the permit to clearly understand the monitor waiver reduction guidelines. If waiver request is for select pollutants, list the parameters excluded from monitoring: ——

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware hat there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: [signature]

Title: Jim Jakubiak, Environmental Manager

Date: 7-8-07

SCHN00246186

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
1*	11/30/2006	7.92	320	12.5	0.16	0.375	1.5
6	11/30/2006	7.80	5.0	7.4	0.005	0.023	0.045
	5/20/2007	7.62	48	3.0	0.007	ND	0.072
13	11/30/2006	8.98	190	6.9	0.11	0.177	0.61
	5/20/2007	7.46	15.0	3.5	0.047	0.040	0.20
14	11/30/2006	8.85	150.0	2.3	0.13	0.255	0.74
	5/20/2007	7.88	48.0	6.2	0.011	ND	0.035
20	11/30/2006	7.23	53	ND	ND	0.056	0.06
	5/20/2007	7.31	8.00	ND	0.048	0.017	0.21

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field and in laboratory. Lab data presented in table.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

*Outfall #1 system pumps were turned on for sampling purposes because previous agency comments required samples be collected from the offline system.

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 05/21/07 15:00

REPORT DATE: 05/29/07 09:39 **REPORT NUMBER:** 7052105

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
7052105-01	Stormwater #6	05/21/2007	0830	Water
7052105-02	Stormwater #13	05/21/2007	0905	Water
7052105-03	Stormwater #14	05/21/2007	0908	Water
7052105-04	Stormwater #20	05/21/2007	0842	Water

5/22/07 [illegible]

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME	NOTES
7052105-01	**SAMPLE ID: Stormwater #6**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.2	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.62	SU		DAU	05/21/2007 15:50	
		TEMPERATURE (C)	18.7	SU				
SUSPENDED SC	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	48.0	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.007	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.072	mg/L	0.003	KEL	05/23/2007 09:53	
7052105-02	**SAMPLE ID: Stormwater #13**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.5	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.46	SU		DAU	05/21/2007 15:50	
		TEMPERATURE (C)	18.7	SU				
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	15.0	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.047	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	0.040	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.20	mg/L	0.003	KEL	05/23/2007 09:53	
7052105-03	**SAMPLE ID: Stormwater #14**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	6.2	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.88	SU		DAU	05/21/2007 15:50	

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Charles Morrow - Laboratory Director

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CI CERTIFICATE OF ANALYSIS

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME	NOTES
7052105-03	**SAMPLE ID: Stormwater #14**							
General Bench Analysis								
PH	EPA 150.1/9040	TEMPERATURE (C)	18.9	SU		DAU	05/21/2007 15:50	
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	48.0	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.011	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.035	mg/L	0.003	KEL	05/23/2007 09:53	
7052105-04	**SAMPLE ID: Stormwater #20**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	05/25/2007 06:43	
PH	EPA 150.1/9040	pH	7.31	SU		DAU	05/21/2007 15:50	
		TEMPERATURE (C)	18.8	SU				
SUSPENDED SOLIDS	EPA160.2/SM2540	TOTAL SUSPENDED SOLIDS	8.00	mg/L	5.00	DAU	05/24/2007 14:45	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.048	mg/L	0.005	KEL	05/23/2007 09:53	
LEAD - ICP		LEAD	0.017	mg/L	0.005	KEL	05/23/2007 09:53	
ZINC - ICP		ZINC	0.21	mg/L	0.003	KEL	05/23/2007 09:53	

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☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: Schnitzer Steel - Portland
Attention: Jim Jakubiak
Address: P.O. Box 10047 Portland, OR
Phone: (503) 286-6996
Fax:
Sampler: [signature] ☒ Submitted

Project Name:
Project Number:
P.O. Number:
Testing Priority: ☒ Normal ☐ Rush
Due Date:
Notification Method(s): ☐ Telephone ☐ Email ☐ Mail

Analysis To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	Total Metals Cu/Pb/Zn EPA 200.7	TSS EPA 160.2	Oil & Grease EPA 413.1	pH EPA 150.1
#6		Water	5-20-07	0830	x	x	x	x
#13		Water	5-20-07	0905	x	x	x	x
#14		Water	5-20-07	0908	x	x	x	x
#20		Water	5-20-07	0842	x	x	x	x

(20)

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[signature]	5-21-07 1500	Charles Morrow	5-21-07 1500
Relinquished By:	Date/Time	Received By:	Date/Time

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Inspection Job Number:
PO#
Laboratory Project Number: 7052105
Cash/check #
Due Date: 5/31/07
Amount Paid: $

SCHN00246190

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 11/30/06 15:05

REPORT DATE: 12/13/06 00:48 REPORT NUMBER: 6113005

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
6113005-01	Stormwater #1	11/30/2006	0830	Water
6113005-02	Stormwater #6	11/30/2006	0450	Water
6113005-03	Stormwater #13	11/30/2006	0520	Water
6113005-04	Stormwater #14	11/30/2006	0515	Water
6113005-05	Stormwater #20	11/30/2006	0630	Water

ORIGINAL

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
6113005-01	**SAMPLE ID: Stormwater #1**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	12.5	mg/L	2.0	JRW	12/11/2006 14:07
PH	EPA 150.1/9040	pH	7.92	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.8	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	320	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.16	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.375	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	1.5	mg/L	0.003	KEL	12/01/2006 14:56
6113005-02	**SAMPLE ID: Stormwater #6**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	7.4	mg/L	2.0	JRW	12/12/2006 13:15
PH	EPA 150.1/9040	pH	7.80	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.5	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	5.0	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.005	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.023	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.045	mg/L	0.003	KEL	12/01/2006 14:56
6113005-03	**SAMPLE ID: Stormwater #13**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	6.9	mg/L	2.0	JRW	12/12/2006 15:31
PH	EPA 150.1/9040	pH	8.98	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.5	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	190	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.11	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.177	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.61	mg/L	0.003	KEL	12/01/2006 14:56
6113005-04	**SAMPLE ID: Stormwater #14**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2.3	mg/L	2.0	JRW	12/12/2006 15:31
PH	EPA 150.1/9040	pH	8.85	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.1	SU			

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Charles Morrow - Laboratory Director

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CI CERTIFICATE OF ANALYSIS

REPORT DATE: 12/13/06 00:48 REPORT NUMBER: 6113005

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
6113005-04	**SAMPLE ID: Stormwater #14**						
General Bench Analysis							
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	150	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.13	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.255	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.74	mg/L	0.003	KEL	12/01/2006 14:56
6113005-05	**SAMPLE ID: Stormwater #20**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/12/2006 15:31
PH	EPA 150.1/9040	pH	7.23	SU		DAU	11/30/2006 16:17
		TEMPERATURE (C)	15.4	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	53	mg/L	5.0	DAU	12/06/2006 12:43
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.005	KEL	12/01/2006 14:56
LEAD - ICP		LEAD	0.056	mg/L	0.005	KEL	12/01/2006 14:56
ZINC - ICP		ZINC	0.060	mg/L	0.003	KEL	12/01/2006 14:56

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COLUMBIA INSPECTION, INC.

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AND
NON-COMMERCIAL BILL OF LADING

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☐ 4592 E 2nd Street, Ste 'A', Benicia, CA 94510 — Ph: (707) 748-7587 Fax: (707) 748-7764
☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: [illegible]
Attention: [illegible]
Address: [illegible]
Phone: [illegible]
Fax: [illegible]
Sampler: [illegible] ☐ Submitted

Project Name: [illegible]
Project Number:
P.O. Number:
Testing Priority: ☒ Normal ☐ Rush
Due Date:
Notification Method(s): ☐ Telephone ☐ Email ☐ Mail

Analysis To Be Performed: Total Metals, Cu, Pb, Zn; Total Metals = Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver; TCLP EPA 1312; Oil & Grease EPA 1664; pH EPA 150.1

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	Total Metals, Cu, Pb, Zn	Total Metals = Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver	TCLP EPA 1312	Oil & Grease EPA 1664	pH EPA 150.1
#1		Water	11-30-06	[illegible]	X	X	X	X	
#2		Water	11-30-06	[illegible]	X	X	X	X	
#3		Water	11-30-06	[illegible]	X	X	X	X	
#4		Water	11-30-06	[illegible]	X	X	X	X	
#20		Water	11-30-06	[illegible]	X	X	X	X	

Relinquished By:	Date/Time	Received By:	Date/Time
[illegible]	11-30-06 [illegible]	[illegible]	11/30/06 [illegible]
Relinquished By:	Date/Time	Received By:	Date/Time

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Inspection Job Number: _____ PO# _____
Laboratory Project Number: _____ Cash/check # _____
Due Date: _____ Amount Paid: $ _____

SCHN00246193

SCHNITZER STEEL PRODUCTS CO.
12005 N Burgard Road, Portland, Oregon 97203
P.O. Box 10047, Portland, Oregon 97296-0047
(503) 224-9900 FAX (503) 286-6948

July 7, 2006

Mr. Dennis Jurries
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201-4987

Re: Storm Water Monitoring Results for 2005-2006 Permit #1200-Z, File #108103

Dear Mr. Jurries:

The tabulated storm water analytical data for the Schnitzer Steel Product's Co.'s facility located at 12005 North Burgard Road in Portland is attached. During the past year Schnitzer Steel collected stormwater samples from outfalls on November 25, 2005 and March 16, 2006. Results of the laboratory analyses are summarized in Table 1 and provided in attached laboratory reports.

We continue to implement Best Management Practices (BMPs) as outlined in our updated Stormwater Pollution Control Plan. Schnitzer continues to improve and enhance maintenance of existing treatment systems. We also are evaluating new structural BMPs and storm water treatment technologies for inclusion and adoption into our overall site stormwater program.

Please contact me at (503) 286-6976 if you have questions.

Sincerely,
Schnitzer Steel Products Co.

Jim Jakubiak
Environmental Administrator

Attachments: Discharge Monitoring Report
Laboratory Reports

NPDES 1200-Z General Permit for Storm Water Runoff
Discharge Monitoring Report

Complete report and send once a year by July 15 to:
Oregon DEQ

Legal Name: Schnitzer Steel Products Co.

Site/File ID #: 108103

Common Name: SCHNITZER STEEL

County: Multnomah

Facility Location: 12005 N. Burgard Road
Portland, OR. 97203

Reporting period: July 1, 2005 to June 30, 2006

Twice a Year Sampling

Monitor for the following pollutants at the monitoring points specified in your Storm Water Pollution Control Plan (SWPCP). Add more sheets if you have more than three monitoring points.

(See Attached Table)

Pollutant Sample 2/Year, Each Monitoring Point[1]	Date of Sample	Monitoring Points #	#	#
Total copper – If value exceeds 0.1 mg/l, review/revision of SWPCP required				
Total lead – If value exceeds 0.4 mg/l, review/revision of SWPCP required				
Total zinc – If value exceeds 0.6 mg/l, review/revision of SWPCP required				
pH – If value is outside of 5.5 to 9.0 S.U., review/revision of SWPCP required[2]				
Total suspended solids – If value exceeds 130 mg/l, review/revision of SWPCP required[2]				
Oil and grease– If value exceeds 10 mg/l, review/revision of SWPCP required[2]				
E. coli – If value exceeds 406 counts/100 ml, review/revision of SWPCP required. Only applies to landfills accepting septage/biosolids and sewage treatment plants.				

See reverse side for additional visual monitoring and signature for report.

---

[1] Monitoring frequency may be reduced under some circumstances – refer to page 10 of your permit. If monitoring requirements have been waived, please write in "WAIVED" for that pollutant.
[2] Separate effluent limits for these pollutants apply for coal fired power plants, cement plants, and/or roofing or asphalt paving operations.

Monthly Visual Observations

Parameter and Requirements	Monitoring #		Monitoring #		Monitoring #	
	Sample Date	Results	Sample Date	Results	Sample Date	Results
Oil and Grease Sheen - No visible sheen allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January	1-9-06	No sheen				
February	2-22-06	No sheen				
March	3-7-06	No sheen				
April	4-11-06	No sheen				
May	5-19-06	No sheen				
June	6-30-06	No sheen				
July	7-27-05	No sheen				
August	8-12-05	No sheen				
September	9-21-05	No sheen				
October	10-5-05	No sheen				
November	11-25-05	No sheen				
December	12-17-05	No sheen				
Floating Solids (associated with industrial activities) – No visible discharge allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January	1-9-06	No solids				
February	2-22-06	No solids				
March	3-7-06	No solids				
April	4-11-06	No solids				
May	5-19-06	No solids				
June	6-30-06	No solids				
July	7-27-05	No solids				
August	8-12-05	No solids				
September	9-21-05	No solids				
October	10-5-05	No solids				
November	11-25-05	No solids				
December	12-17-05	No solids				

Note – If there are any monitored results that exceed the benchmark values, you must review and revise as necessary your SWPCP within 60 days of exceeding the benchmark. SWPCP revisions must be submitted to DEQ within 14 days of completion.

Signature Requirement

I certify, under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature of Responsible Official: [signature]

Name and Title (Please Print): Jim Jakobick, Environmental Manager

Date of Signature: 7-17-06 **Telephone:** (503) 286-6876

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
3	11/25/2005	7.98	50	5.9	0.18	0.223	2.7
	3/16/2006	7.08	170.0	14.4	0.27	0.710	10
4	11/25/2005	6.96	10	3.0	0.034	ND	0.075
	3/16/2005	7.82	10	6.1	0.13	0.071	0.26
5	11/25/2006	7.01	6.3	ND	0.007	0.023	0.098
	3/16/2005	7.73	5.0	ND	0.007	0.005	0.022
6	11/25/2005	8.10	9.3	ND	ND	ND	0.004
	3/16/2006	8.84	ND	ND	ND	ND	ND
14	11/25/2005	7.99	ND	ND	ND	ND	0.038
15	11/25/2005	6.91	40	ND	0.075	0.074	0.21
	3/16/2006	9.01	210	3.4	0.14	0.243	0.57
16	3/16/2006	9.39	92	ND	0.10	0.224	0.72
20	11/25/2005	7.86	3.0	ND	ND	ND	0.006
	3/16/2006	8.12	160.0	2.5	0.034	0.074	0.22

Notes:

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field and in laboratory for 3/16/06 samples.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 11/28/05 09:00

REPORT DATE: 12/09/05 09:54 **REPORT NUMBER:** 5112805

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
5112805-01	# 3	11/25/2005	0700	Water
5112805-02	# 4	11/25/2005	0715	Water
5112805-03	# 5	11/25/2005	0720	Water
5112805-04	# 6	11/25/2005	0730	Water
5112805-05	# 14	11/25/2005	0830	Water
5112805-06	# 15	11/25/2005	0800	Water
5112805-07	# 20	11/25/2005	0845	Water

ORIGINAL

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
5112805-01	**SAMPLE ID: # 3**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	5.9	mg/L	2.0	JRW	12/07/2005 08:27
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	50	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.18	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	0.223	mg/L	0.005	KEL	11/28/2005 13:04
ZINC - ICP		ZINC	2.7	mg/L	0.003	KEL	11/28/2005 13:04
5112805-02	**SAMPLE ID: # 4**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.0	mg/L	2.0	JRW	12/07/2005 08:27
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	10	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.034	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	11/28/2005 13:04
ZINC - ICP		ZINC	0.075	mg/L	0.003	KEL	11/28/2005 13:04
5112805-03	**SAMPLE ID: # 5**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/07/2005 13:50
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	6.3	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.007	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	0.023	mg/L	0.005	KEL	11/28/2005 13:04
ZINC - ICP		ZINC	0.098	mg/L	0.003	KEL	11/28/2005 13:04
5112805-04	**SAMPLE ID: # 6**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/07/2005 13:50
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	9.3	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	11/28/2005 13:04
ZINC - ICP		ZINC	0.004	mg/L	0.003	KEL	11/28/2005 13:04

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CI CERTIFICATE OF ANALYSIS

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
5112805-05	**SAMPLE ID: # 14**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/07/2005 13:50
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	ND	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	11/28/2005 13:04
ZINC - ICP		ZINC	0.038	mg/L	0.003	KEL	11/28/2005 13:04
5112805-06	**SAMPLE ID: # 15**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/07/2005 13:50
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	40	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.075	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	0.074	mg/L	0.005	KEL	11/28/2005 13:04
ZINC - ICP		ZINC	0.21	mg/L	0.003	KEL	11/28/2005 13:04
5112805-07	**SAMPLE ID: # 20**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/07/2005 13:50
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	3.0	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	11/28/2005 13:04
ZINC - ICP		ZINC	0.006	mg/L	0.003	KEL	11/28/2005 13:04

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☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: Schnitzer Steel - IT
Attention: Jim Jakubiak
Address: P.O. Box 10047
Phone: Portland, OR 97296
Fax: (503) 286-6960 10047
Sampler: [signature] ☒ Submitted

Project Name: SSI - IT
Project Number:
P.O. Number:
Testing Priority: ☒ Normal ☐ Rush
Due Date:
Notification Method(s): ☐ Telephone ☐ Email ☐ Mail

Analysis To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	Total O&G EPA 1664	Total Suspended Solids EPA 160.2		Total Metals - Cu, Pb, Zn - EPA 200.7/6010B										
#3		Water	11/25/05	0700	X	X		X										
#4		Water	11/25/05	0715	X	X		X										
#5		Water	11/25/05	0770	X	X		X										
#6		Water	11/25/05	0730	X	X		X										
#14		Water	11/25/05	0830	X	X		X										
#15		Water	11/25/05	0800	X	X		X										
#20		Water	11/25/05	0845	X	X		X										

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	11/28/05 0900	[signature]	11/28/05 0900
Relinquished By:	Date/Time	Received By:	Date/Time

FOR LABORATORY USE ONLY

Inspection Job Number: _____ PO# _____
Laboratory Project Number: _____ Cash/check # _____
Due Date: _____ Amount Paid: $ _____

SCHN00246200

Sample Acceptance Policy

All samples must meet the following requirements:

- **Chain of Custody:** The COC list of samples must match the number and type of sample containers received, and sample descriptions on the COC must match the sample bottles. The requested tests and where possible, specific methods are shown on the COC.
- **Appropriate Container:** The correct sample containers must be used for the requested analyses.
- **Sample Volume:** There must be sufficient sample volume for the test(s) requested.
- **Holding Time:** The holding times for the requested analyses must not be expired.

Environmental samples must meet the following additional requirements:

- **Sample Temperature:** Samples that require refrigeration shall be considered acceptable if the temperature as measured upon receipt is either within 2° C of the required temperature or the method specified range. For samples with a specified temperature of 4° C, samples received at temperatures ranging from just above freezing to 6° C shall be acceptable.

  NOTE: **Samples that are delivered to the laboratory shortly after sampling may not meet this criterion. However, the samples shall be considered acceptable if there is evidence that the chilling process has begun such as arrival on ice, or if the samples were taken within the hour.**

- **Sample Preservation:** Where possible without sacrificing the integrity of the sample, determine whether the sample bottle has been preserved correctly.

Discrepancies:

If there is any doubt as to the suitability for testing such as the **sample does not conform to the sample description**, the sample containers are **damaged**, **leaking**, or **may be contaminated from other damaged or leaking sample containers**, or where **testing is not specified**, further instructions from the client are required. If the issue cannot be resolved and the sample does not meet sample acceptance criteria the laboratory shall either.

- Fully document any decision to proceed with the analysis and note the condition of the sample on the COC and work order; or
- Retain correspondence and/or records of conversations regarding the final disposition of rejected samples.

Rejected Samples:

- Should the client choose to proceed with testing on questionable samples, the Work Order must be clearly marked with the nature of the problem so that the final report data may be appropriately qualified.
- Rejected samples must still be logged into LIMS to obtain a unique sample identification number to track sample disposition. However, for rejected samples, no testing is assigned. Instead, the sample status is set to "Rejected" by editing the work order status using the Update Status function of the Laboratory menu in LIMS.

Refer to the Columbia Inspection, Inc. Laboratory Policy, LP00.01, Sample Acceptance Policy and SOP15.01 Sample Receipt for complete details.

Sample Disposal:

- Samples are disposed of after 45 days unless prior arrangements have been made with the laboratory.
- Samples that are deemed hazardous may be returned to the client for proper disposal.

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Investment Corp.
ATTN: James Jakubiak
3200 NW Yeon
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 03/16/06 14:10

REPORT DATE: 03/28/06 15:44 **REPORT NUMBER:** 6031604

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
6031604-01	#3	03/16/2006	0700	Water
6031604-02	#4	03/16/2006	0715	Water
6031604-03	#5	03/16/2006	0730	Water
6031604-04	#6	03/16/2006	0745	Water
6031604-05	#15	03/16/2006	0830	Water
6031604-06	#16	03/16/2006	0635	Water
6031604-07	#20	03/16/2006	0650	Water

ORIGINAL

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
6031604-01	**SAMPLE ID: #3**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	14.4	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	7.08	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	15.8	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	170	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.27	mg/L	0.005	KEL	03/20/2006 16:28
LEAD - ICP		LEAD	0.710	mg/L	0.005	KEL	03/20/2006 16:28
ZINC - ICP		ZINC	10	mg/L	0.003	KEL	03/20/2006 16:28
6031604-02	**SAMPLE ID: #4**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	6.1	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	7.82	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	14.8	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	10	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.13	mg/L	0.005	KEL	03/20/2006 16:28
LEAD - ICP		LEAD	0.071	mg/L	0.005	KEL	03/20/2006 16:28
ZINC - ICP		ZINC	0.26	mg/L	0.003	KEL	03/20/2006 16:28
6031604-03	**SAMPLE ID: #5**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	7.73	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	14.9	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	5.0	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.007	mg/L	0.005	KEL	03/20/2006 16:28
LEAD - ICP		LEAD	0.005	mg/L	0.005	KEL	03/20/2006 16:28
ZINC - ICP		ZINC	0.022	mg/L	0.003	KEL	03/20/2006 16:28
6031604-04	**SAMPLE ID: #6**						
General Bench Analysis							

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CI CERTIFICATE OF ANALYSIS

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
6031604-04	**SAMPLE ID: #6**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	8.84	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	15.0	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	ND	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.005	KEL	03/20/2006 16:28
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	03/20/2006 16:28
ZINC - ICP		ZINC	ND	mg/L	0.003	KEL	03/20/2006 16:28
6031604-05	**SAMPLE ID: #15**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.4	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	9.01	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	15.1	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	210	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.14	mg/L	0.005	KEL	03/20/2006 16:28
LEAD - ICP		LEAD	0.243	mg/L	0.005	KEL	03/20/2006 16:28
ZINC - ICP		ZINC	0.57	mg/L	0.003	KEL	03/20/2006 16:28
6031604-06	**SAMPLE ID: #16**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	9.39	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	15.5	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	92	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.10	mg/L	0.005	KEL	03/20/2006 16:28
LEAD - ICP		LEAD	0.224	mg/L	0.005	KEL	03/20/2006 16:28
ZINC - ICP		ZINC	0.72	mg/L	0.003	KEL	03/20/2006 16:28
6031604-07	**SAMPLE ID: #20**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2.5	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	8.12	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	15.8	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	160	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.034	mg/L	0.005	KEL	03/20/2006 16:28
LEAD - ICP		LEAD	0.074	mg/L	0.005	KEL	03/20/2006 16:28
ZINC - ICP		ZINC	0.22	mg/L	0.003	KEL	03/20/2006 16:28

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COLUMBIA INSPECTION, INC 7133 N. Lombard, Portland, OR 97203 Ph:(503) 286-9464 Fax:(503) 286-5355 E-mail:cilabqa@ColumbiaInspection.com

COLUMBIA INSPECTION, INC.

CHAIN OF CUSTODY RECORD
AND
NON-COMMERCIAL BILL OF LADING

☒ 7133 N. Lombard, Portland, OR 97203 — Ph: (503) 286-9464 Fax: (503) 285-7831
☐ 4901 E. 20th Street, Fife, WA 98424 — Ph: (253) 922-8781 Fax: (253) 922-8957
☐ 4592 E 2nd Street, Ste 'A', Benicia, CA 94510 — Ph: (707) 748-7587 Fax: (707) 748-7764
☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: Schnitzer Steel - IT
Attention: Jim Jakibiak
Address: P.O. Box 10047
Phone: Portland, OR 97296-0047
Fax: (503) 286-6960
Sampler: [signature] ☒ Submitted

Project Name: SI - IT
Project Number:
P.O. Number:
Testing Priority: ☒ Normal ☐ Rush
Due Date:
Notification Method(s): ☐ Telephone ☐ Email ☐ Mail

Analysis To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	Total Oil & Grease EPA 1661	Total Suspended Solids EPA 1602	Total Metals Cu/Pb/Zn EPA 200.7	pH
#3		Water	3-16-06	0700	X	X	X	X
#4		↓	↓	0715	X	X	X	X
#5				0730	X	X	X	X
#6				0745	X	X	X	X
#8				0630	X	X	X	X
#16				0635	X	X	X	X
#20				0650	X	X	X	X

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	3/16/06 1410	[signature]	3/16/6 1410
Relinquished By:	Date/Time	Received By:	Date/Time

FOR LABORATORY USE ONLY

Inspection Job Number: _____ PO# _____
Laboratory Project Number: _____ Cash/check # _____
Due Date: _____ Amount Paid: $ _____

SCHN00246204

Sample Acceptance Policy

All samples must meet the following requirements:

- **Chain of Custody:** The COC list of samples must match the number and type of sample containers received, and sample descriptions on the COC must match the sample bottles. The requested tests and where possible, specific methods are shown on the COC.
- **Appropriate Container:** The correct sample containers must be used for the requested analyses.
- **Sample Volume:** There must be sufficient sample volume for the test(s) requested.
- **Holding Time:** The holding times for the requested analyses must not be expired.

Environmental samples must meet the following additional requirements:

- **Sample Temperature:** Samples that require refrigeration shall be considered acceptable if the temperature as measured upon receipt is either within 2° C of the required temperature or the method specified range. For samples with a specified temperature of 4° C, samples received at temperatures ranging from just above freezing to 6° C shall be acceptable.

  NOTE: **Samples that are delivered to the laboratory shortly after sampling may not meet this criterion. However, the samples shall be considered acceptable if there is evidence that the chilling process has begun such as arrival on ice, or if the samples were taken within the hour.**

- **Sample Preservation:** Where possible without sacrificing the integrity of the sample, determine whether the sample bottle has been preserved correctly.

Discrepancies:

If there is any doubt as to the suitability for testing such as the **sample does not conform to the sample description**, the sample containers are **damaged, leaking**, or **may be contaminated from other damaged or leaking sample containers**, or where **testing is not specified**, further instructions from the client are required. If the issue cannot be resolved and the sample does not meet sample acceptance criteria the laboratory shall either.

- Fully document any decision to proceed with the analysis and note the condition of the sample on the COC and work order; or
- Retain correspondence and/or records of conversations regarding the final disposition of rejected samples.

Rejected Samples:

- Should the client choose to proceed with testing on questionable samples, the Work Order must be clearly marked with the nature of the problem so that the final report data may be appropriately qualified.
- Rejected samples must still be logged into LIMS to obtain a unique sample identification number to track sample disposition. However, for rejected samples, no testing is assigned. Instead, the sample status is set to "Rejected" by editing the work order status using the Update Status function of the Laboratory menu in LIMS.

Refer to the Columbia Inspection, Inc. Laboratory Policy, LP00.01, Sample Acceptance Policy and SOP15.01 Sample Receipt for complete details.

Sample Disposal:

- Samples are disposed of after 45 days unless prior arrangements have been made with the laboratory.
- Samples that are deemed hazardous may be returned to the client for proper disposal.

Schnitzer Steel Industries, Inc.

Transmittal

To: Aaron Wieting, City of Portland

From: Jim Jakubiak JJ **Date:** 7/7/2006

Re: Annual Storm Water Monitoring Data

CC: Mat Cusma, Tom Zelenka

☐ Urgent ☑ For Use ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Attached is a copy of the 2005 and 2006 stormwater monitoring data for Schnitzer Steel's facility in Portland, Oregon. Included in the submittal are the monitoring results and the Monitoring Report Form. Please contact me at (503) 286-6976 if you have questions or comments.

City of Portland
Environment Services
Industrial Stormwater

INDUSTRIAL STORMWATER PROGRAM
NPDES 1200-Z MONITORING REPORT

Industry Name: SCHNITZER STEEL INTERNATIONAL
Site Address: PO BOX 10047

The Permittee shall monitor stormwater **twice** per year (October – December) and (January – April for the parameters outlined in their NPDES 1200-Z Stormwater discharge Permit Schedule B.1.a. The Permittee shall perform visual observations on a **monthly** basis as outlined in Schedule B of the Permit. The Permittee shall submit monitoring data results to the City and the DEQ as stated in Schedule D.2.

Stormwater samples were taken for the above Permittee, on these days and at these sample points:

Sampling Dates	Sampling Points
November 25, 2005	Outfalls 3, 4, 5, 6, 14, 15, 20
March 16, 2006	Outfalls 3, 4, 5, 6, 15, 16, 20

The Permittee shall submit by **July 15** of each year a copy of the **laboratory analysis reports**, which show analytical methods and detection limits, for stormwater samples collected for the previous monitoring year (July 1-June 30).

☐ **Monitoring Waiver Reduction Notification:**

Check the box if your facility is exercising a waiver of monitoring based on meeting benchmarks listed in Schedule A.9, AND site conditions have not changed to impact stormwater runoff. Note: This does not exclude your facility from notifying DEQ about the waiver of monitoring. Please read Schedule B of the permit to clearly understand the monitor waiver reduction guidelines. If waiver request is for select pollutants, list the parameters excluded from monitoring:_____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware hat there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: [illegible]

Title: Environmental Administrator

Date: July 7, 2006

SCHN00246207

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
3	11/25/2005	7.98	50	5.9	0.18	0.223	2.7
	3/16/2006	7.08	170.0	14.4	0.27	0.710	10
4	11/25/2005	6.96	10	3.0	0.034	ND	0.075
	3/16/2005	7.82	10	6.1	0.13	0.071	0.26
5	11/25/2006	7.01	6.3	ND	0.007	0.023	0.098
	3/16/2005	7.73	5.0	ND	0.007	0.005	0.022
6	11/25/2005	8.10	9.3	ND	ND	ND	0.004
	3/16/2006	8.84	ND	ND	ND	ND	ND
14	11/25/2005	7.99	ND	ND	ND	ND	0.038
15	11/25/2005	6.91	40	ND	0.075	0.074	0.21
	3/16/2006	9.01	210	3.4	0.14	0.243	0.57
16	3/16/2006	9.39	92	ND	0.10	0.224	0.72
20	11/25/2005	7.86	3.0	ND	ND	ND	0.006
	3/16/2006	8.12	160.0	2.5	0.034	0.074	0.22

Notes:

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field and in laboratory for 3/16/06 samples.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 11/28/05 09:00

REPORT DATE: 12/09/05 09:54 **REPORT NUMBER:** 5112805

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
5112805-01	# 3	11/25/2005	0700	Water
5112805-02	# 4	11/25/2005	0715	Water
5112805-03	# 5	11/25/2005	0720	Water
5112805-04	# 6	11/25/2005	0730	Water
5112805-05	# 14	11/25/2005	0830	Water
5112805-06	# 15	11/25/2005	0800	Water
5112805-07	# 20	11/25/2005	0845	Water

ORIGINAL

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
5112805-01	**SAMPLE ID: # 3**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	5.9	mg/L	2.0	JRW	12/07/2005 08:27
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	50	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.18	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	0.223	mg/L	0.005	KEL	11/28/2005 13:04
ZINC - ICP		ZINC	2.7	mg/L	0.003	KEL	11/28/2005 13:04
5112805-02	**SAMPLE ID: # 4**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.0	mg/L	2.0	JRW	12/07/2005 08:27
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	10	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.034	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	11/28/2005 13:04
ZINC - ICP		ZINC	0.075	mg/L	0.003	KEL	11/28/2005 13:04
5112805-03	**SAMPLE ID: # 5**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/07/2005 13:50
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	6.3	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.007	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	0.023	mg/L	0.005	KEL	11/28/2005 13:04
ZINC - ICP		ZINC	0.098	mg/L	0.003	KEL	11/28/2005 13:04
5112805-04	**SAMPLE ID: # 6**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/07/2005 13:50
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	9.3	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	11/28/2005 13:04
ZINC - ICP		ZINC	0.004	mg/L	0.003	KEL	11/28/2005 13:04

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CI CERTIFICATE OF ANALYSIS

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
5112805-05	**SAMPLE ID: # 14**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/07/2005 13:50
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	ND	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	11/28/2005 13:04
ZINC - ICP		ZINC	0.038	mg/L	0.003	KEL	11/28/2005 13:04
5112805-06	**SAMPLE ID: # 15**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/07/2005 13:50
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	40	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.075	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	0.074	mg/L	0.005	KEL	11/28/2005 13:04
ZINC - ICP		ZINC	0.21	mg/L	0.003	KEL	11/28/2005 13:04
5112805-07	**SAMPLE ID: # 20**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	12/07/2005 13:50
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	3.0	mg/L	1.0	MES	11/29/2005 10:16
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.005	KEL	11/28/2005 13:04
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	11/28/2005 13:04
[illegible] - ICP		ZINC	0.006	mg/L	0.003	KEL	11/28/2005 13:04

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COLUMBIA INSPECTION, INC.

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☐ 4901 E. 20th Street, Fife, WA 98424 — Ph: (253) 922-8781 Fax: (253) 922-8957
☐ 4592 E 2nd Street, Ste 'A', Benicia, CA 94510 — Ph: (707) 748-7587 Fax: (707) 748-7764
☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name:	Schnitzer Steel - IT
Attention:	Tim Jakubiak
Address:	PO Box 10047
Phone:	Portland, OR 97296
Fax:	(503) 286-6960 10047
Sampler:	[signature] ☒ Submitted

Project Name:	SSI - IT
Project Number:	
P.O. Number:	
Testing Priority	Notification Method(s)
☒ Normal	☐ Telephone
☐ Rush	☐ Email
Due Date:	☐ Mail

Analysis To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	Total O&G EPA 1664	Total Suspended Solids EPA 160.2		Total Metals - Cu, Pb, Zn - EPA 200.7/6010B									
#3		Water	11/25/05	0700	X	X		X									
#4		Water	11/25/05	0715	X	X		X									
#5		Water	11/25/05	0720	X	X		X									
#6		Water	11/25/05	0730	X	X		X									
#14		Water	11/25/05	0830	X	X		X									
#15		Water	11/25/05	0800	X	X		X									
#20		Water	11/25/05	0845	X	X		X									

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	11/28/05 0900	[signature]	11/28/ 0900
Relinquished By:	Date/Time	Received By:	Date/Time

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Inspection Job Number: _____ PO# _____
Laboratory Project Number: _____ Cash/check # _____
Due Date: _____ Amount Paid: $ _____

SCHN00246211

Sample Acceptance Policy

All samples must meet the following requirements:

- **Chain of Custody:** The COC list of samples must match the number and type of sample containers received, and sample descriptions on the COC must match the sample bottles. The requested tests and where possible, specific methods are shown on the COC.
- **Appropriate Container:** The correct sample containers must be used for the requested analyses.
- **Sample Volume:** There must be sufficient sample volume for the test(s) requested.
- **Holding Time:** The holding times for the requested analyses must not be expired.

Environmental samples must meet the following additional requirements:

- **Sample Temperature:** Samples that require refrigeration shall be considered acceptable if the temperature as measured upon receipt is either within 2° C of the required temperature or the method specified range. For samples with a specified temperature of 4° C, samples received at temperatures ranging from just above freezing to 6° C shall be acceptable.

  NOTE: **Samples that are delivered to the laboratory shortly after sampling may not meet this criterion. However, the samples shall be considered acceptable if there is evidence that the chilling process has begun such as arrival on ice, or if the samples were taken within the hour.**

- **Sample Preservation:** Where possible without sacrificing the integrity of the sample, determine whether the sample bottle has been preserved correctly.

Discrepancies:

If there is any doubt as to the suitability for testing such as the **sample does not conform to the sample description**, the sample containers are **damaged, leaking**, or may be **contaminated from other damaged or leaking sample containers**, or where **testing is not specified**, further instructions from the client are required. If the issue cannot be resolved and the sample does not meet sample acceptance criteria the laboratory shall either.

- Fully document any decision to proceed with the analysis and note the condition of the sample on the COC and work order; or
- Retain correspondence and/or records of conversations regarding the final disposition of rejected samples.

Rejected Samples:

- Should the client choose to proceed with testing on questionable samples, the Work Order must be clearly marked with the nature of the problem so that the final report data may be appropriately qualified.
- Rejected samples must still be logged into LIMS to obtain a unique sample identification number to track sample disposition. However, for rejected samples, no testing is assigned. Instead, the sample status is set to "Rejected" by editing the work order status using the Update Status function of the Laboratory menu in LIMS.

Refer to the Columbia Inspection, Inc. Laboratory Policy, LP00.01, Sample Acceptance Policy and SOP15.01 Sample Receipt for complete details.

Sample Disposal:

- Samples are disposed of after 45 days unless prior arrangements have been made with the laboratory.
- Samples that are deemed hazardous may be returned to the client for proper disposal.

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Investment Corp.
ATTN: James Jakubiak
3200 NW Yeon
Portland OR, 97296

PROJECT NAME: 1200Z Stormwater Test

PHONE: (503) 286-6976
FAX: (503) 286-6948

SUBMITTED: 03/16/06 14:10

REPORT DATE: 03/28/06 15:44 **REPORT NUMBER:** 6031604

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
6031604-01	#3	03/16/2006	0700	Water
6031604-02	#4	03/16/2006	0715	Water
6031604-03	#5	03/16/2006	0730	Water
6031604-04	#6	03/16/2006	0745	Water
6031604-05	#15	03/16/2006	0630	Water
6031604-06	#16	03/16/2006	0635	Water
6031604-07	#20	03/16/2006	0650	Water

ORIGINAL

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
6031604-01	**SAMPLE ID: #3**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	14.4	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	7.08	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	15.8	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	170	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.27	mg/L	0.005	KEL	03/20/2006 16:28
[illegible]D - ICP		LEAD	0.710	mg/L	0.005	KEL	03/20/2006 16:28
[illegible] - ICP		ZINC	10	mg/L	0.003	KEL	03/20/2006 16:28
6031604-02	**SAMPLE ID: #4**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	6.1	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	7.82	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	14.8	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	10	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.13	mg/L	0.005	KEL	03/20/2006 16:28
LEAD - ICP		LEAD	0.071	mg/L	0.005	KEL	03/20/2006 16:28
ZINC - ICP		ZINC	0.26	mg/L	0.003	KEL	03/20/2006 16:28
6031604-03	**SAMPLE ID: #5**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	7.73	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	14.9	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	5.0	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.007	mg/L	0.005	KEL	03/20/2006 16:28
LEAD - ICP		LEAD	0.005	mg/L	0.005	KEL	03/20/2006 16:28
ZINC - ICP		ZINC	0.022	mg/L	0.003	KEL	03/20/2006 16:28
6031604-04	**SAMPLE ID: #6**						
General Bench Analysis							

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Richard D. Reid - Laboratory Director

CI CERTIFICATE OF ANALYSIS

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
6031604-04	**SAMPLE ID: #6**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	8.84	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	15.0	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	ND	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.005	KEL	03/20/2006 16:28
LEAD - ICP		LEAD	ND	mg/L	0.005	KEL	03/20/2006 16:28
ZINC - ICP		ZINC	ND	mg/L	0.003	KEL	03/20/2006 16:28
6031604-05	**SAMPLE ID: #15**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.4	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	9.01	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	15.1	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	210	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.14	mg/L	0.005	KEL	03/20/2006 16:28
LEAD - ICP		LEAD	0.243	mg/L	0.005	KEL	03/20/2006 16:28
ZINC - ICP		ZINC	0.57	mg/L	0.003	KEL	03/20/2006 16:28
6031604-06	**SAMPLE ID: #16**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	9.39	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	15.5	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	92	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.10	mg/L	0.005	KEL	03/20/2006 16:28
LEAD - ICP		LEAD	0.224	mg/L	0.005	KEL	03/20/2006 16:28
ZINC - ICP		ZINC	0.72	mg/L	0.003	KEL	03/20/2006 16:28
6031604-07	**SAMPLE ID: #20**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2.5	mg/L	2.0	JRW	03/28/2006 12:59
PH	EPA 150.1/9040	pH	8.12	SU		DAU	03/16/2006 14:55
		TEMPERATURE (C)	15.8	SU			
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	160	mg/L	1.0	DAU	03/17/2006 08:02
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.034	mg/L	0.005	KEL	03/20/2006 16:28
LEAD - ICP		LEAD	0.074	mg/L	0.005	KEL	03/20/2006 16:28
ZINC - ICP		ZINC	0.22	mg/L	0.003	KEL	03/20/2006 16:28

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COLUMBIA INSPECTION, INC 7133 N. Lombard, Portland, OR 97203 Ph:(503) 286-9464 Fax:(503) 286-5355 E-mail:cilabqa@ColumbiaInspection.com

COLUMBIA INSPECTION, INC.

CHAIN OF CUSTODY RECORD
AND
NON-COMMERCIAL BILL OF LADING

☒ 7133 N. Lombard, Portland, OR 97203 — Ph: (503) 286-9464 Fax: (503) 285-7831
☐ 4901 E. 20th Street, Fife, WA 98424 — Ph: (253) 922-8781 Fax: (253) 922-8957
☐ 4592 E 2nd Street, Ste 'A', Benicia, CA 94510 — Ph: (707) 748-7587 Fax: (707) 748-7764
☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: Schnitzer Steel - IT
Attention: Jim Jakibiak
Address: P.O. Box 10047
Phone: Portland, OR. 97296-0047
Fax: (503) 286 6960
Sampler: [signature] ☒ Submitted

Project Name: SSI - I.T.
Project Number:
P.O. Number:
Testing Priority: ☒ Normal ☐ Rush
Notification Method(s): ☐ Telephone ☐ Email ☐ Mail
Due Date:

Analysis To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	Total Oil & Grease EPA 1661	Total Suspended Solids EPA 160.2	Total Metals Cu/Pb/Zn EPA 200.7/1640D	pH
#3		Water	3-16-06	0700	X	X	X	X
#4		↓	↓	0715	X	X	X	X
#5				0730	X	X	X	X
#6				0745	X	X	X	X
#1				0630	X	X	X	X
#16				0635	X	X	X	X
#20		↓	↓	0650	X	X	X	X

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	3/16/06 1410	[signature]	3/16/6 1410
Relinquished By:	Date/Time	Received By:	Date/Time

FOR LABORATORY USE ONLY

Inspection Job Number: _____ PO# _____
Laboratory Project Number: _____ Cash/check # _____
Due Date: _____ Amount Paid: $ _____

SCHN00246215

Sample Acceptance Policy

All samples must meet the following requirements:

- **Chain of Custody:** The COC list of samples must match the number and type of sample containers received, and sample descriptions on the COC must match the sample bottles. The requested tests and where possible, specific methods are shown on the COC.
- **Appropriate Container:** The correct sample containers must be used for the requested analyses.
- **Sample Volume:** There must be sufficient sample volume for the test(s) requested.
- **Holding Time:** The holding times for the requested analyses must not be expired.

Environmental samples must meet the following additional requirements:

- **Sample Temperature:** Samples that require refrigeration shall be considered acceptable if the temperature as measured upon receipt is either within 2° C of the required temperature or the method specified range. For samples with a specified temperature of 4° C, samples received at temperatures ranging from just above freezing to 6° C shall be acceptable.

  NOTE: **Samples that are delivered to the laboratory shortly after sampling may not meet this criterion. However, the samples shall be considered acceptable if there is evidence that the chilling process has begun such as arrival on ice, or if the samples were taken within the hour.**

- **Sample Preservation:** Where possible without sacrificing the integrity of the sample, determine whether the sample bottle has been preserved correctly.

Discrepancies:

If there is any doubt as to the suitability for testing such as the **sample does not conform to the sample description**, the sample containers are **damaged**, **leaking**, or **may be contaminated from other damaged or leaking sample containers**, or where **testing is not specified**, further instructions from the client are required. If the issue cannot be resolved and the sample does not meet sample acceptance criteria the laboratory shall either.

- Fully document any decision to proceed with the analysis and note the condition of the sample on the COC and work order; or
- Retain correspondence and/or records of conversations regarding the final disposition of rejected samples.

Rejected Samples:

- Should the client choose to proceed with testing on questionable samples, the Work Order must be clearly marked with the nature of the problem so that the final report data may be appropriately qualified.
- Rejected samples must still be logged into LIMS to obtain a unique sample identification number to track sample disposition. However, for rejected samples, no testing is assigned. Instead, the sample status is set to "Rejected" by editing the work order status using the Update Status function of the Laboratory menu in LIMS.

Refer to the Columbia Inspection, Inc. Laboratory Policy, LP00.01, Sample Acceptance Policy and SOP15.01 Sample Receipt for complete details.

Sample Disposal:

- Samples are disposed of after 45 days unless prior arrangements have been made with the laboratory.
- Samples that are deemed hazardous may be returned to the client for proper disposal.

SCHNITZER STEEL PRODUCTS CO.

12005 N Burgard Road, Portland, Oregon 97203
P.O. Box 10047, Portland, Oregon 97296-0047
(503) 224-9900 FAX (503) 286-6948

July 11, 2005

Mr. Dennis Jurries
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201-4987

Re: Storm Water Monitoring Results for 2004-2005 Permit #1200-Z, File #108103

Dear Mr. Jurries:

The tabulated storm water analytical data for the Schnitzer Steel Product's Co.'s facility located at 12005 North Burgard Road in Portland is attached. During the past year Schnitzer Steel collected stormwater samples from outfalls on December 13, 2005 and March 26, 2005. Results of the laboratory analyses are summarized in Table 1 and provided in attached laboratory reports.

We continue to implement Best Management Practices (BMPs) as outlined in our updated Stormwater Pollution Control Plan. Schnitzer continues to improve and enhance maintenance of existing treatment systems. We also evaluate new BMPs and storm water treatment technologies that are developed for possible inclusion and adoption into our overall site stormwater program.

Please contact me at (503) 286-6976 if you have questions.

Sincerely,
Schnitzer Steel Products Co.

Jim Jakubiak
Environmental Administrator

Attachments: Discharge Monitoring Report
Laboratory Reports

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
1	12/13/2004	7.29	280	11.2	0.20	0.691	2.2
	3/26/2005	7.02	4.0	3.7	0.063	0.114	0.58
3	12/13/2004	7.21	130	9.6	0.23	0.398	2.3
	3/26/2005	6.81	12	ND	0.066	0.119	0.61
4	12/13/2004	6.76	48	3.1	0.12	0.210	0.49
	3/26/2005	7.13	21	ND	0.055	0.084	0.90
5	12/13/2004	7.05	100	4.4	0.17	0.401	0.92
	3/26/2005	7.01	60	ND	0.093	0.217	0.59
6	12/13/2004	7.55	14	ND	0.023	0.040	0.10
	3/26/2005	7.58	26	ND	0.008	0.019	0.034
14	12/13/2004	7.71	15	2.4	0.037	0.066	0.19
15	3/26/2005	8.10	34	6.0	0.058	0.086	0.17
16	12/13/2004	7.45	12	2.0	0.033	0.019	0.20
	3/26/2005	7.93	5.0	ND	0.026	0.054	0.29
20	12/13/2004	7.38	18	ND	0.009	ND	0.028
	3/26/2005	7.92	8.0	ND	0.019	0.027	0.29

Notes:

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

NPDES 1200-Z General Permit for Storm Water Runoff
Discharge Monitoring Report

Complete report and send once a year by July 15 to:
Oregon DEQ

Legal Name: Schnitzer Steel Products Co.

Site/File ID #: 108103

Common Name: SCHNITZER STEEL

County: Multnomah

Facility Location: 12005 N. Burgard Road
Portland, OR. 97203

Reporting period: July 1, 2004 to June 30, 2005

Twice a Year Sampling

Monitor for the following pollutants at the monitoring points specified in your Storm Water Pollution Control Plan (SWPCP). Add more sheets if you have more than three monitoring points.

(See Attached Table)

Pollutant Sample 2/Year, Each Monitoring Point[1]	Date of Sample	Monitoring Points #	#	#
Total copper – If value exceeds 0.1 mg/l, review/revision of SWPCP required				
Total lead – If value exceeds 0.4 mg/l, review/revision of SWPCP required				
Total zinc – If value exceeds 0.6 mg/l, review/revision of SWPCP required				
pH – If value is outside of 5.5 to 9.0 S.U., review/revision of SWPCP required[2]				
Total suspended solids – If value exceeds 130 mg/l, review/revision of SWPCP required[2]				
Oil and grease– If value exceeds 10 mg/l, review/revision of SWPCP required[2]				
E. coli – If value exceeds 406 counts/100 ml, review/revision of SWPCP required. Only applies to landfills accepting septage/biosolids and sewage treatment plants.				

See reverse side for additional visual monitoring and signature for report.

[1] Monitoring frequency may be reduced under some circumstances – refer to page 10 of your permit. If monitoring requirements have been waived, please write in "WAIVED" for that pollutant.
[2] Separate effluent limits for these pollutants apply for coal fired power plants, cement plants, and/or roofing or asphalt paving operations.

Monthly Visual Observations

Parameter and Requirements	Monitoring # Sample Date	Monitoring # Results	Monitoring # Sample Date	Monitoring # Results	Monitoring # Sample Date	Monitoring # Results
Oil and Grease Sheen - No visible sheen allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January	1/17/2005	No Sheen				
February	2/13/2005	No Sheen				
March	3/16/2005	No Sheen				
April	4/19/2005	No Sheen				
May	5/23/2005	No Sheen				
June	6/15/2005	No Sheen				
July	7/12/2004	No Sheen				
August	8/16/2004	No Sheen				
September	9/16/2004	No Sheen				
October	10/13/2004	No Sheen				
November	11/18/2004	No Sheen				
December	12/13/2004	No Sheen				
Floating Solids (associated with industrial activities) – No visible discharge allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January	1/17/2005	No Solids				
February	2/13/2005	No Solids				
March	3/16/2005	No Solids				
April	4/19/2005	No Solids				
May	5/23/2005	No Solids				
June	6/15/2005	No Solids				
July	7/12/2004	No Solids				
August	8/16/2004	No Solids				
September	9/16/2004	No Solids				
October	10/13/2004	No Solids				
November	11/18/2004	No Solids				
December	12/13/2004	No Solids				

Note – If there are any monitored results that exceed the benchmark values, you must review and revise as necessary your SWPCP within 60 days of exceeding the benchmark. SWPCP revisions must be submitted to DEQ within 14 days of completion.

Signature Requirement

I certify, under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature of Responsible Official: _____

Name and Title (Please Print): Jim Goodrich

Date of Signature: 7-12-05 **Telephone:** 503-224-9000

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 12/14/04 15:39

REPORT DATE: 12/30/04 15:30 **REPORT NUMBER:** 4121411

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
4121411-01	Stormwater #1	12/13/2004	1800	Water
4121411-02	Stormwater #3	12/13/2004	1820	Water
4121411-03	Stormwater #4	12/13/2004	1830	Water
4121411-04	Stormwater #5	12/13/2004	1840	Water
4121411-05	Stormwater #6	12/13/2004	1850	Water
4121411-06	Stormwater #14	12/13/2004	1910	Water
4121411-07	Stormwater #16	12/13/2004	1925	Water
4121411-08	Stormwater #20	12/13/2004	1945	Water

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
4121411-01	**SAMPLE ID: Stormwater #1**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	11.2	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	280	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.20	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	0.691	mg/L	0.005	BKB	12/17/2004 14:17
ZINC - ICP		ZINC	2.2	mg/L	0.003	BKB	12/17/2004 14:17
4121411-02	**SAMPLE ID: Stormwater #3**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	9.6	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	130	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.23	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	0.398	mg/L	0.005	BKB	12/17/2004 14:17
ZINC - ICP		ZINC	2.3	mg/L	0.003	BKB	12/17/2004 14:17
4121411-03	**SAMPLE ID: Stormwater #4**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.1	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	48	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.12	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	0.210	mg/L	0.005	BKB	12/17/2004 14:17
ZINC - ICP		ZINC	0.49	mg/L	0.003	BKB	12/17/2004 14:17
4121411-04	**SAMPLE ID: Stormwater #5**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	4.4	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	100	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.17	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	0.401	mg/L	0.005	BKB	12/17/2004 14:17

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Authorized for Release By:

Richard D. Reid - Laboratory Director

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COLUMBIA INSPECTION, INC 7133 N. Lombard, Portland, OR 97203 Phone:(503) 286-9464 Fax:(503) 286-5355 E-mail:lab@ColumbiaInspection.com

CI CERTIFICATE OF ANALYSIS

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
4121411-04	**SAMPLE ID: Stormwater #5**						
Total Metals by Inductively Coupled Plasma							
ZINC - ICP	EPA 200.7/6010B	ZINC	0.92	mg/L	0.003	BKB	12/17/2004 14:17
4121411-05	**SAMPLE ID: Stormwater #8**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	14	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.023	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	0.040	mg/L	0.005	BKB	12/17/2004 14:17
ZINC - ICP		ZINC	0.10	mg/L	0.003	BKB	12/17/2004 14:17
4121411-06	**SAMPLE ID: Stormwater #14**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2.4	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	15	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.037	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	0.066	mg/L	0.005	BKB	12/17/2004 14:17
ZINC - ICP		ZINC	0.19	mg/L	0.003	BKB	12/17/2004 14:17
4121411-07	**SAMPLE ID: Stormwater #16**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2.0	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	12	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.033	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	0.019	mg/L	0.005	BKB	12/17/2004 14:17
ZINC - ICP		ZINC	0.20	mg/L	0.003	BKB	12/17/2004 14:17
4121411-08	**SAMPLE ID: Stormwater #20**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	18	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.009	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	ND	mg/L	0.005	BKB	12/17/2004 14:17
ZINC - ICP		ZINC	0.028	mg/L	0.003	BKB	12/17/2004 14:17

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COLUMBIA INSPECTION, INC.

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☐ 4592 E 2nd Street, Ste 'A', Benicia, CA 94510 — Ph: (707) 748-7587 Fax: (707) 748-7764
☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name:	Schnitzer Steel
Attention:	Jim Jankowiak
Address:	P.O. Box 10017 - Portland, OR. 97296-0047
Phone:	(503) 786-6976
Fax:	(503) 286-6960
Sampler:	[signature] ☑ Submitted

Project Name:	SW Sampling
Project Number:	
P.O. Number:	
Testing Priority	Notification Method(s)
☑ Normal	☐ Telephone
☐ Rush	☐ Email
Due Date:	☐ Mail

Analysis To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	Oil & Grease (EPA Method 1664)	Metals (Cu, Pb, Zn) (EPA 200.7)	TSS (EPA 160.2)
#1		Water	12/13/04	1800	X	X	X
#3		Water	12/13/04	1820	X	X	X
#4		Water	12/13/04	1830	X	X	X
#5		Water	12/13/04	1840	X	X	X
#6		Water	12/13/04	1850	X	X	X
#14		Water	12/13/04	1910	X	X	X
#16		Water	12/13/04	1925	X	X	X
#20		Water	12/13/04	1945	X	X	X

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	12/14/04 1539	[signature]	12-14-04 1539
Relinquished By:	Date/Time	Received By:	Date/Time

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Laboratory Project Number: _____ Cash/check # _____
Due Date: _____ Amount Paid: $ _____

SCHN00246223

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 03/31/05 12:15

REPORT DATE: 04/11/05 15:12 **REPORT NUMBER:** 5033110

ORIGINAL

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
5033110-01	Stormwater #1	03/26/2005	0830	Water
5033110-02	Stormwater #3	03/26/2005	0835	Water
5033110-03	Stormwater #4	03/26/2005	0842	Water
5033110-04	Stormwater #5	03/26/2005	0848	Water
5033110-05	Stormwater #6	03/26/2005	~~0848~~	Water 0858 gtg
5033110-06	Stormwater #15	03/26/2005	~~0858~~	Water 0915 gtg
5033110-07	Stormwater #16	03/26/2005	~~0915~~	Water 0930 gtg
5033110-08	Stormwater #20	03/26/2005	~~0930~~	Water 0940 gtg

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
5033110-01	**SAMPLE ID: Stormwater #1**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.7	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	4.0	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.063	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.114	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.58	mg/L	0.003	BKB	04/01/2005 14:33
5033110-02	**SAMPLE ID: Stormwater #3**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	12	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.066	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.119	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.61	mg/L	0.003	BKB	04/01/2005 14:33
5033110-03	**SAMPLE ID: Stormwater #4**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	21	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.055	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.084	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.90	mg/L	0.003	BKB	04/01/2005 14:33
5033110-04	**SAMPLE ID: Stormwater #5**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	60	mg/L	1.5	MRP	04/01/2005 12:42

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SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
5033110-04	**SAMPLE ID: Stormwater #5**						
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.093	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.217	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.59	mg/L	0.003	BKB	04/01/2005 14:33
5033110-05	**SAMPLE ID: Stormwater #6**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	26	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.008	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.019	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.034	mg/L	0.003	BKB	04/01/2005 14:33
5033110-06	**SAMPLE ID: Stormwater #15**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	6.0	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	34	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.058	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.086	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.17	mg/L	0.003	BKB	04/01/2005 14:33
5033110-07	**SAMPLE ID: Stormwater #16**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	5.0	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.026	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.054	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.29	mg/L	0.003	BKB	04/01/2005 14:33
5033110-08	**SAMPLE ID: Stormwater #20**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	8.0	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.019	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.027	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.29	mg/L	0.003	BKB	04/01/2005 14:33

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☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: Schnitzer Steel - Portland
Attention: Jim Jakubiak
Address: P.O. Box 1007 Portland, OR.
Phone: (503) 286-6776
Fax: (503) 286-6960
Sampler: Jim Jakubiak ☒ Submitted

Project Name:
Project Number:
P.O. Number:
Testing Priority: ☒ Normal ☐ Rush
Due Date:
Notification Method(s): ☐ Telephone ☐ Email ☐ Mail

Analysis To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample ~~Date~~ Time	Sample ~~Time~~ Date	Oil & Grease EPA Method 1664	Copper Lead/Zinc Metals - EPA 200.7/6010	TSS - EPA Method 160.2
#1		Water	0830	3-26-05	X	X	X
#3		Water	0835	3-26-05	X	X	X
#4		Water	0842	3-26-05	X	X	X
#5		Water	0848	3-26-05	X	X	X
#6		Water	0858	3-26-05	X	X	X
#15		Water	0915	3-26-05	X	X	X
#16		Water	0930	3-26-05	X	X	X
#20		Water	0940	3-26-05	X	X	X

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[signature]			
Relinquished By:	Date/Time	Received By: [signature]	Date/Time 3/31/05 12:15

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Laboratory Project Number: _____ Cash/check # _____
Due Date: _____ Amount Paid: $ _____

SCHN00246226

Schnitzer Steel Industries, Inc.

Transmittal

To: Aaron Wieting, City of Portland

From: Jim Jakubiak JJ **Date:** 7/12/2005

Re: Annual Storm Water Monitoring Data

CC: Mat Cusma, Tom Zelenka

☐ Urgent ☑ For Use ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Attached is a copy of the 2004 and 2005 stormwater monitoring data for Schnitzer Steel's facility in Portland, Oregon. Included in the submittal are the monitoring results and the Monitoring Report Form. Please contact me at (503) 286-6976 if you have questions or comments.

Bureau of Environmental Services

Industrial Source Control Division

INDUSTRIAL STORMWATER

NPDES 1200-Z MONITORING REPORT

Industry Name: **SCHNITZER STEEL INTERNATIONAL**

Site Address: **12005 N BURGARD RD, PORTLAND, OR**

The permittee shall monitor stormwater **twice** per year for the parameters outlined in their NPDES 1200-Z Stormwater Discharge Permit Schedule B.1.a., and submit results to the City as stated in Schedule D.2.

Stormwater samples were taken for the above permittee, on these days and at these sample points:

Sample Date(s)	Sample Point(s)
December 13, 2004	Outfalls 1, 3, 4, 5, 6, 14, 16, 20
March 26, 2005	Outfalls 1, 3, 4, 5, 6, 15, 16, 20

The permittee shall submit by **July 15** of each year a copy of the **laboratory analysis reports**, which show analytical methods and detection limits, for stormwater samples collected for the previous monitoring year (July 1-June 30).

☐ **Monitoring Waiver Reduction Notification:**
Check the box if your facility is exercising a waiver of monitoring based on meeting benchmarks listed in Schedule A.9., AND site conditions have not changed to impact stormwater run-off. Note: This does not exclude your facility from notifying DEQ about the waiver of monitoring. Please read Schedule B of the permit to clearly understand the monitor waiver reduction guidelines. If waiver request is for select pollutants, list the parameters excluded from monitoring: _____.

☐ **No Exposure Certification:**
Check the box if your facility is required to have a NPDES 1200-Z permit, but monitoring is not required due to no exposure of stormwater to industrial activities. This no exposure certification is outlined in Schedule B.3.b, and the facility meets the requirements of Schedule B.1.e. Note: This does not exclude your facility from notifying DEQ.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Title: Environmental Administrator

Date: July 12, 2005

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
1	12/13/2004	7.29	280	11.2	0.20	0.691	2.2
	3/26/2005	7.02	4.0	3.7	0.063	0.114	0.58
3	12/13/2004	7.21	130	9.6	0.23	0.398	2.3
	3/26/2005	6.81	12	ND	0.066	0.119	0.61
4	12/13/2004	6.76	48	3.1	0.12	0.210	0.49
	3/26/2005	7.13	21	ND	0.055	0.084	0.90
5	12/13/2004	7.05	100	4.4	0.17	0.401	0.92
	3/26/2005	7.01	60	ND	0.093	0.217	0.59
6	12/13/2004	7.55	14	ND	0.023	0.040	0.10
	3/26/2005	7.58	26	ND	0.008	0.019	0.034
14	12/13/2004	7.71	15	2.4	0.037	0.066	0.19
15	3/26/2005	8.10	34	6.0	0.058	0.086	0.17
16	12/13/2004	7.45	12	2.0	0.033	0.019	0.20
	3/26/2005	7.93	5.0	ND	0.026	0.054	0.29
20	12/13/2004	7.38	18	ND	0.009	ND	0.028
	3/26/2005	7.92	8.0	ND	0.019	0.027	0.29

Notes:

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 12/14/04 15:39

REPORT DATE: 12/30/04 15:30 REPORT NUMBER: 4121411

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
4121411-01	Stormwater #1	12/13/2004	1800	Water
4121411-02	Stormwater #3	12/13/2004	1820	Water
4121411-03	Stormwater #4	12/13/2004	1830	Water
4121411-04	Stormwater #5	12/13/2004	1840	Water
4121411-05	Stormwater #6	12/13/2004	1850	Water
4121411-06	Stormwater #14	12/13/2004	1910	Water
4121411-07	Stormwater #16	12/13/2004	1925	Water
4121411-08	Stormwater #20	12/13/2004	1945	Water

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
4121411-01	**SAMPLE ID: Stormwater #1**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	11.2	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	280	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.20	mg/L	0.005	BKB	12/17/2004 14:17
L[illegible] - ICP		LEAD	0.691	mg/L	0.005	BKB	12/17/2004 14:17
Z[illegible] ICP		ZINC	2.2	mg/L	0.003	BKB	12/17/2004 14:17
4121411-02	**SAMPLE ID: Stormwater #3**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	9.6	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	130	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.23	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	0.398	mg/L	0.005	BKB	12/17/2004 14:17
ZINC - ICP		ZINC	2.3	mg/L	0.003	BKB	12/17/2004 14:17
4121411-03	**SAMPLE ID: Stormwater #4**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.1	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	48	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.12	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	0.210	mg/L	0.005	BKB	12/17/2004 14:17
ZINC - ICP		ZINC	0.49	mg/L	0.003	BKB	12/17/2004 14:17
4121411-04	**SAMPLE ID: Stormwater #5**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	4.4	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	100	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.17	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	0.401	mg/L	0.005	BKB	12/17/2004 14:17

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SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
4121411-04	**SAMPLE ID: Stormwater #5**						
Total Metals by Inductively Coupled Plasma							
ZINC - ICP	EPA 200.7/6010B	ZINC	0.92	mg/L	0.003	BKB	12/17/2004 14:17
4121411-05	**SAMPLE ID: Stormwater #6**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	14	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.023	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	0.040	mg/L	0.005	BKB	12/17/2004 14:17
ZINC - ICP		ZINC	0.10	mg/L	0.003	BKB	12/17/2004 14:17
4121411-06	**SAMPLE ID: Stormwater #14**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2.4	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	15	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.037	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	0.066	mg/L	0.005	BKB	12/17/2004 14:17
ZINC - ICP		ZINC	0.19	mg/L	0.003	BKB	12/17/2004 14:17
4121411-07	**SAMPLE ID: Stormwater #16**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2.0	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	12	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.033	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	0.019	mg/L	0.005	BKB	12/17/2004 14:17
ZINC - ICP		ZINC	0.20	mg/L	0.003	BKB	12/17/2004 14:17
4121411-08	**SAMPLE ID: Stormwater #20**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	PA	12/16/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	18	mg/L	1.0	AKH	12/20/2004 14:18
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.009	mg/L	0.005	BKB	12/17/2004 14:17
LEAD - ICP		LEAD	ND	mg/L	0.005	BKB	12/17/2004 14:17
ZINC - ICP		ZINC	0.028	mg/L	0.003	BKB	12/17/2004 14:17

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☐ 4901 E. 20th Street, Fife, WA 98424 — Ph: (253) 922-8781 Fax: (253) 922-8957
☐ 4592 E 2nd Street, Ste 'A', Benicia, CA 94510 — Ph: (707) 748-7587 Fax: (707) 748-7764
☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: Schnitzer Steel
Attention: Jim Jakubiak
Address: P.O. Box 10017 - Portland, OR. 97296-0017
Phone: (503) 786-6976
Fax: (503) 286-6960
Sampler: [signature] ☑ Submitted

Project Name: SW Sampling
Project Number:
P.O. Number:
Testing Priority: ☒ Normal ☐ Rush
Due Date:
Notification Method(s): ☐ Telephone ☒ Email ☐ Mail

Analysis To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	Oil & Grease (EPA Method 1664)	Metals (Cu, Pb, Zn) (EPA 200.7)	TSS (EPA 160.2)
#1		Water	12/13/04	1800	X	X	X
#3		Water	12/13/04	1820	X	X	X
#4		Water	12/13/04	1830	X	X	X
#5		Water	12/13/04	1840	X	X	X
#6		Water	12/13/04	1850	X	X	X
#17		Water	12/13/04	1910	X	X	X
#16		Water	12/13/04	1925	X	X	X
#20		Water	12/13/04	1945	X	X	X

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	12/14/04 1539	[signature]	12-14-04 1539
Relinquished By:	Date/Time	Received By:	Date/Time

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Inspection Job Number: _____ PO# _____
Laboratory Project Number: _____ Cash/check # _____
Due Date: _____ Amount Paid: $ _____

SCHN00246232

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 03/31/05 12:15

REPORT DATE: 04/11/05 15:12 **REPORT NUMBER:** 5033110

ORIGINAL

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
5033110-01	Stormwater #1	03/26/2005	0830	Water
5033110-02	Stormwater #3	03/26/2005	0835	Water
5033110-03	Stormwater #4	03/26/2005	0842	Water
5033110-04	Stormwater #5	03/26/2005	0848	Water
5033110-05	Stormwater #6	03/26/2005	~~0848~~	Water 0858
5033110-06	Stormwater #15	03/26/2005	~~0858~~	Water 0915
5033110-07	Stormwater #16	03/26/2005	~~0915~~	Water 0930
5033110-08	Stormwater #20	03/26/2005	~~0930~~	Water 0940

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
5033110-01	**SAMPLE ID: Stormwater #1**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.7	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	4.0	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.063	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.114	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.58	mg/L	0.003	BKB	04/01/2005 14:33
5033110-02	**SAMPLE ID: Stormwater #3**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	12	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.066	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.119	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.61	mg/L	0.003	BKB	04/01/2005 14:33
5033110-03	**SAMPLE ID: Stormwater #4**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	21	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.055	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.084	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.90	mg/L	0.003	BKB	04/01/2005 14:33
5033110-04	**SAMPLE ID: Stormwater #5**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	60	mg/L	1.5	MRP	04/01/2005 12:42

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CI CERTIFICATE OF ANALYSIS

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
5033110-04	**SAMPLE ID: Stormwater #5**						
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.093	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.217	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.59	mg/L	0.003	BKB	04/01/2005 14:33
5033110-05	**SAMPLE ID: Stormwater #6**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	26	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.008	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.019	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.034	mg/L	0.003	BKB	04/01/2005 14:33
5033110-06	**SAMPLE ID: Stormwater #15**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	6.0	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	34	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.058	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.086	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.17	mg/L	0.003	BKB	04/01/2005 14:33
5033110-07	**SAMPLE ID: Stormwater #16**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	5.0	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.026	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.054	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.29	mg/L	0.003	BKB	04/01/2005 14:33
5033110-08	**SAMPLE ID: Stormwater #20**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	DM	04/11/2005 09:07
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	8.0	mg/L	1.5	MRP	04/01/2005 12:42
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.019	mg/L	0.005	BKB	04/01/2005 14:33
LEAD - ICP		LEAD	0.027	mg/L	0.005	BKB	04/01/2005 14:33
ZINC - ICP		ZINC	0.29	mg/L	0.003	BKB	04/01/2005 14:33

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☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: Schnitzer Steel - Portland
Attention: Jim Jakubiak
Address: P.O. Box 100 A Portland, OR.
Phone: (503) 286-6776
Fax: (503) 286-6960
Sampler: Jim Jakubiak ☒ Submitted

Project Name:
Project Number:
P.O. Number:
Testing Priority: ☒ Normal ☐ Rush
Due Date:
Notification Method(s): ☐ Telephone ☐ Email ☐ Mail

Analysis To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Time ~~Date~~	Sample Date ~~Time~~	Oil & Grease EPA Method 1664	Copper Lead Zinc Metals EPA 200.7/6010	TSS - EPA Method 160.2
#1		Water	0830	3-26-05	X	X	X
#3		Water	0835	3-26-05	X	X	X
#4		Water	0842	3-26-05	X	X	X
#5		Water	0848	3-26-05	X	X	X
#6		Water	0858	3-26-05	X	X	X
#15		Water	0915	3-26-05	X	X	X
#16		Water	0930	3-26-05	X	X	X
#20		Water	0940	3-26-05	X	X	X

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[signature]			
Relinquished By:	Date/Time	Received By: [signature]	Date/Time 3/31/05 12:15

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Laboratory Project Number: _____ Cash/check # _____
Due Date: _____ Amount Paid: $ _____

SCHN00246235

Schnitzer Steel Industries, Inc.

Transmittal

To: Aaron Wieting, City of Portland

From: Jim Jakubiak **Date:** 7/13/2004

Re: Annual Storm Water Monitoring Data

CC: Mat Cusma, Tom Zelenka

☐ **Urgent** ☑ **For Use** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

Attached is a copy of the 2003-2004 annual stormwater monitoring data submittal for Schnitzer Steel's Portland facility located at 12005 North Burgard Road. Included in the submittal are the monitoring results and the Monitoring Report Form. A review of the Stormwater Pollution Control Plan is being completed and a revised plan will be submitted to you shortly. Please contact me at (503) 286-6976 if you have questions or comments.

Industrial Source Control Division

INDUSTRIAL STORMWATER

NPDES 1200-Z MONITORING REPORT

Industry Name: **SCHNITZER STEEL INTERNATIONAL**

Site Address: **12005 N BURGARD RD, PORTLAND, OR**

The permittee shall monitor stormwater **twice** per year for the parameters outlined in their NPDES 1200-Z Stormwater Discharge Permit Schedule B.1.a., and submit results to the City as stated in Schedule D.2.

Stormwater samples were taken for the above permittee, on these days and at these sample points:

Sample Date(s)	Sample Point(s)
December 5, 2003	Outfalls 1, 3, 4, 5, 6A, 14, 16 & 20
May 8, 2004	Outfalls 1, 3, 4, 5, 6A, 15, 16, & 20

The permittee shall submit by **July 15** of each year a copy of the **laboratory analysis reports**, which show analytical methods and detection limits, for stormwater samples collected for the previous monitoring year (July 1-June 30).

☐ **Monitoring Waiver Reduction Notification:**
Check the box if your facility is exercising a waiver of monitoring based on meeting benchmarks listed in Schedule A.9., AND site conditions have not changed to impact stormwater run-off. Note: This does not exclude your facility from notifying DEQ about the waiver of monitoring. Please read Schedule B of the permit to clearly understand the monitor waiver reduction guidelines. If waiver request is for select pollutants, list the parameters excluded from monitoring: _____.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: [signature]

Title: Environmental Administrator

Date: July 12, 2004

SCHN00246237

LAB Results
not attached, but
sent with original
to BES.

Schnitzer Steel Industries, Inc.

Transmittal

To: Aaron Wieting, City of Portland

From: Jim Jakubiak **Date:** 7/16/2004

Re: Annual Storm Water Monitoring Data

CC:

☐ **Urgent** ☑ **For Use** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

Attached is a table summarizing the 2003 and 2004 stromwater data the Schnitzer Steel facility in Portland, Oregon. Included in the data set are the pH measurements. Please contact me at (503) 286-6976 if you have questions or comments.

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
1	12/5/2003	7.48	61	7.4	0.086	0.095	0.550
	5/8/2004	7.01	16	6.7	0.086	0.160	0.400
3	12/5/2003	8.12	22	ND	0.099	0.048	0.669
	5/8/2004	7.67	8	3.2	0.026	0.064	0.240
4	12/5/2003	7.45	ND	ND	0.023	0.003	0.070
	5/8/2004	7.85	4	2.3	0.039	ND	0.035
5	12/5/2003	8.04	12	5.3	0.032	0.023	0.098
	5/8/2004	7.88	8	2.6	0.024	0.036	0.086
6A	12/5/2004	7.37	27	ND	0.012	0.014	0.061
	5/8/2004	7.56	9	ND	0.006	0.037	0.016
14	12/5/2003	7.98	8	ND	0.011	0.025	0.107
15	5/8/2004	7.68	240	8.9	0.190	0.354	0.660
16	12/5/2003	8.03	23	ND	0.029	0.042	0.175
	5/8/2004	8.11	64	3.7	0.150	0.183	0.360
20	12/5/2003	7.86	6	ND	ND	0.002	0.013
	5/8/2004	8.01	32	3.6	0.018	0.025	0.100

Notes:

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

SCHNITZER STEEL PRODUCTS CO.

12005 N Burgard Road, Portland, Oregon 97203
P.O. Box 10047, Portland, Oregon 97296-0047
(503) 224-9900 FAX (503) 286-6948

July 12, 2004

Mr. Dennis Jurries
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201-4987

Re: Storm Water Monitoring Results for 2003-2004 Permit #1200-Z, File #108103

Dear Mr. Jurries:

The tabulated storm water analytical data for the Schnitzer Steel Product's Co.'s facility located at 12005 North Burgard Road in Portland is attached. We have installed additional stormwater treatment systems at outfall 16 and plan to upgrade treatment systems at additional outfalls within the next few months. We continue to implement previously identified Best Management Practices (BMPs) as outlined in our revised Stormwater Pollution Control Plan. Schnitzer continues to evaluate new BMPs that are developed for possible inclusion and adoption into our overall site stormwater program.

During the past year Schnitzer Steel collected stormwater samples from outfalls on December 5, 2003 and May 8, 2004. Results of the laboratory analyses are summarized in Table 1 and provided in attached laboratory reports.

Please contact me at (503) 286-6976 if you have questions.

Sincerely,
Schnitzer Steel Products Co.

Jim Jakubiak
Environmental Administrator

Attachments: Discharge Monitoring Report
Laboratory Reports

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
1	12/5/2003	7.48	61	7.4	0.086	0.095	0.550
	5/8/2004	7.01	16	6.7	0.086	0.160	0.400
3	12/5/2003	8.12	22	ND	0.099	0.048	0.669
	5/8/2004	7.67	8	3.2	0.026	0.064	0.240
4	12/5/2003	7.45	ND	ND	0.023	0.003	0.070
	5/8/2004	7.85	4	2.3	0.039	ND	0.035
5	12/5/2003	8.04	12	5.3	0.032	0.023	0.098
	5/8/2004	7.88	8	2.6	0.024	0.036	0.086
6A	12/5/2004	7.37	27	ND	0.012	0.014	0.061
	5/8/2004	7.56	9	ND	0.006	0.037	0.016
14	12/5/2003	7.98	8	ND	0.011	0.025	0.107
15	5/8/2004	7.68	240	8.9	0.190	0.354	0.660
16	12/5/2003	8.03	23	ND	0.029	0.042	0.175
	5/8/2004	8.11	64	3.7	0.150	0.183	0.360
20	12/5/2003	7.86	6	ND	ND	0.002	0.013
	5/8/2004	8.01	32	3.6	0.018	0.025	0.100

Notes:

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

NPDES 1200-Z General Permit for Storm Water Runoff

Discharge Monitoring Report

Complete report and send once a year by July 15 to:
Oregon DEQ

Legal Name: Schnitzer Steel Products Co.

Site/File ID #: 108103

Common Name: SCHNITZER STEEL

County: Multnomah

Facility Location: 12005 N. Burgard Road
Portland, OR. 97203

Reporting period: July 1, 2003 to June 30, 2004

Twice a Year Sampling

Monitor for the following pollutants at the monitoring points specified in your Storm Water Pollution Control Plan (SWPCP). Add more sheets if you have more than three monitoring points.

(See Attached Table)

Pollutant Sample 2/Year, Each Monitoring Point[1]	Date of Sample	Monitoring Points #	#	#
Total copper – If value exceeds 0.1 mg/l, review/revision of SWPCP required				
Total lead – If value exceeds 0.4 mg/l, review/revision of SWPCP required				
Total zinc – If value exceeds 0.6 mg/l, review/revision of SWPCP required				
pH – If value is outside of 5.5 to 9.0 S.U., review/revision of SWPCP required[2]				
Total suspended solids – If value exceeds 130 mg/l, review/revision of SWPCP required[2]				
Oil and grease– If value exceeds 10 mg/l, review/revision of SWPCP required[2]				
E. coli – If value exceeds 406 counts/100 ml, review/revision of SWPCP required. Only applies to landfills accepting septage/biosolids and sewage treatment plants.				

See reverse side for additional visual monitoring and signature for report.

[1] Monitoring frequency may be reduced under some circumstances – refer to page 10 of your permit. If monitoring requirements have been waived, please write in "WAIVED" for that pollutant.

[2] Separate effluent limits for these pollutants apply for coal fired power plants, cement plants, and/or roofing or asphalt paving operations.

Monthly Visual Observations

Parameter and Requirements	Monitoring # Sample Date	Monitoring # Results	Monitoring # Sample Date	Monitoring # Results	Monitoring # Sample Date	Monitoring # Results
Oil and Grease Sheen - No visible sheen allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January	1/29/04	No sheen				
February	2/8/04	No sheen				
March	3/18/04	No sheen				
April	4/19/04	No sheen				
May	5/8/04	No sheen				
June	6/11/04	No sheen				
July	7/2/2003	No sheen				
August	8/22/2003	No sheen				
September	9/5/2003	No sheen				
October	10/7/2003	No sheen				
November	11/17/2003	No sheen				
December	12/29/2003	No sheen				
Floating Solids (associated with industrial activities) – No visible discharge allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January	1/29/04	No discharge				
February	2/8/04	No discharge				
March	3/18/04	No discharge				
April	4/19/04	No discharge				
May	5/8/04	No discharge				
June	6/11/04	No discharge				
July	7/2/2003	No discharge				
August	8/22/2003	No discharge				
September	9/5/2003	No discharge				
October	10/7/2003	No discharge				
November	11/17/2003	No discharge				
December	12/29/2003	No discharge				

Note – If there are any monitored results that exceed the benchmark values, you must review and revise as necessary your SWPCP within 60 days of exceeding the benchmark. SWPCP revisions must be submitted to DEQ within 14 days of completion.

Signature Requirement

I certify, under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature of Responsible Official: _____

Name and Title (Please Print): Gen Mgr.

Date of Signature: 7-13-04 **Telephone:** 503-793-0023

1317 South 13th Avenue P.O. Box 479 Kelso, Washington 98626 (360) 577-7222 ph (360) 636-1068 fax

Columbia Analytical Services INC.
An Employee - Owned Company

December 24, 2003 Service Request No: K2309678

Jim Jakubiak
Schnitzer Steel Products Co.
P.O. Box 10047
Portland, OR 97210

RE: SSI

Dear Jim:

Enclosed are the results of the sample(s) submitted to our laboratory on December 9, 2003. For your reference, these analyses have been assigned our service request number K2309678.

All analyses were performed according to our laboratory's quality assurance program. The test results meet requirements of the NELAC standards except as noted in the case narrative report. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please call if you have any questions. My extension is 3260.

Respectfully submitted,

Columbia Analytical Services, Inc.

Harvey Jacky
Project Chemist

HJ/jeb

NELAP Accredited ACIL Seal of Excellence Award

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

Inorganic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
)	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.

Metals Data Qualifiers

#	The control limit criteria is not applicable. See case narrative.
B	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
E	The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
M	The duplicate injection precision was not met.
N	The Matrix Spike sample recovery is not within control limits. See case narrative.
S	The reported value was determined by the Method of Standard Additions (MSA).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
W	The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.
*	The duplicate analysis not within control limits. See case narrative.
+	The correlation coefficient for the MSA is less than 0.995.

Organic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
A	A tentatively identified compound, a suspected aldol-condensation product.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
C	The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
D	The reported result is from a dilution.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
N	The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
P	The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results (25% for CLP Pesticides).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a chromatographic interference.
X	See case narrative.

Additional Petroleum Hydrocarbon Specific Qualifiers

F	The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
L	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
H	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
)	The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
Y	The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
Z	The chromatographic fingerprint does not resemble a petroleum product.

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client : Schnitzer Steel Products Co.
Project Name : SSI
Project Number : NA
Sample Matrix : Water

Service Request : K2309678
Date Collected : 12/05/03
Date Received : 12/09/03

Solids, Total Suspended (TSS)

Units : mg/L (ppm)
Basis : NA

Analysis Method : 160.2
Test Notes :

Sample Name	Lab Code	MRL	Dilution Factor	Date Analyzed	Result	Result Notes
#1	K2309678-001	5	1	12/10/03	61	
#3	K2309678-002	5	1	12/10/03	22	
#4	K2309678-003	5	1	12/10/03	ND	
#5	K2309678-004	5	1	12/10/03	12	
#6A	K2309678-005	5	1	12/10/03	27	
#14	K2309678-006	5	1	12/10/03	8	
#16	K2309678-007	5	1	12/10/03	23	
#20	K2309678-008	5	1	12/10/03	6	
Method Blank	K2309678-MB	5	1	12/10/03	ND	

Report By:PWiest

COLUMBIA ANALYTICAL SERVICES, INC.

- Cover Page -
INORGANIC ANALYSIS DATA PACKAGE

Client : Schnitzer Steel Products Co.
Project Name : SSI
Project No. : NA

Service Request : K2309678

Sample Name :	Lab Code :
#1	K2309678-001
#3	K2309678-002
#4	K2309678-003
#5	K2309678-004
#6A	K2309678-005
#14	K2309678-006
#16	K2309678-007
#20	K2309678-008
Method Blank	K2309678-MB

Comments:

000005

Approved By: _____ Date: 12/23/03

SCHN00246249

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2309678
Project Name :	SSI	**Date Collected :**	12/05/03
Project No. :	NA	**Date Received :**	12/09/03
Matrix :	Water	**Date Extracted :**	12/18/03

Total Metals
Units: ug/L (ppb)

	Analyte:	Copper	Lead	Zinc
	EPA Method:	6010B	7421	6010B
	Method Reporting Limit:	10	10	10
	Date Analyzed:	12/19/03	12/19/03	12/19/03
Sample Name	**Lab Code**			
#1	K2309678-001	86	95	550
#3	K2309678-002	99	48	669
#4	K2309678-003	23	3.3	70
#5	K2309678-004	32	22.9	98
#6A	K2309678-005	12	14.2	61
#14	K2309678-006	11	24.6	107
#16	K2309678-007	29	41.5	175
#20	K2309678-008	ND	2.0	13
Method Blank	K2309678-MB	ND	ND	ND

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2309678
Project:	SSI	**Date Collected:**	12/5/03
Sample Matrix:	Water	**Date Received:**	12/9/03
		Date Extracted:	12/22/03
		Date Analyzed:	12/22/03

Oil and Grease
EPA Method 1664
Units: mg/L (ppm)

		Oil & Grease, Total
	Analyte:	**(HEM)**
	Method Reporting Limit:	5.0
Sample Name	**Lab Code**	
#1	K2309678-001	7.4
#3	K2309678-002	ND
#4	K2309678-003	ND
#5	K2309678-004	5.3
#6A	K2309678-005	ND
#14	K2309678-006	ND
#16	K2309678-007	ND
#20	K2309678-008	ND
Method Blank	K031222-WB	ND

Approved By: [signature] Date: 12/23/03

2A/120594
09678PHC.MS1 - SAMPLE 12/23/03

Columbia Analytical Services INC.
An Employee - Owned Company

CHAIN OF CUSTODY

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222x07 • FAX (360) 636-1068

SR#: 4230678 PAGE 1 OF 1 COC #

PROJECT NAME: SSI
PROJECT NUMBER:
PROJECT MANAGER: Jim Jakobiak
COMPANY/ADDRESS: SSI, PO Box 10047
CITY/STATE/ZIP: Portland, OR 97296-0047
E-MAIL ADDRESS:
PHONE #: (503) 286-6976 FAX#: (503) 286-6948
SAMPLER'S SIGNATURE: J. Jakobiak

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics by GC/MS 625☐ 8270☐ 8270LL☐	Volatile Organics 624☐ 8260☐	Hydrocarbons (*see below) Gas☐	8021☐ 8TEX☐ Diesel☐ Oil☐	☐ Fuel Fingerprint (FIQ) ☐ NW-HCID Screen	Oil & Grease/TRPH 1664 HEM☐ 1664 SGT☐ (Sub Oregon)	PCB's Aroclors☐ Congeners☐	Pesticides/Herbicides 608☐ 8081A☐ 8141A☐ 8151A☐	Chlorophenolics - 8151M Tri☐ Tetra☐ PCP☐	PAHS 8310☐ SIM☐	Metals, Total or Dissolved (See list below)	Cyanide☐	pH, Cond., Cl, SO_4, PO_4, F, NO_2, NO_3, BOD, TSS, TDS (circle)	NH_3-N, COD, Total-P, TKN, TOC, DOC (circle) NO_2+NO_3	TOX 9020☐ AOX 1650☐ 508☐	TSS				REMARKS
#1	12/5/03	1000	1	W	3						X					X					X				
#3	12/5/03	1010	2	W	3						X					X					X				
#4	12/5/03	1035	3	W	3						X					X					X				
#5	12/5/03	1050	4	W	3						X					X					X				
#6A	12/5/03	1100	5	W	3						X					X					X				
#14	12/5/03	0905	6	W	3						X					X					X				
#16	12/5/03	0935	7	W	3						X					X					X				
#20	12/5/03	0840	8	W	3						X					X					X				

REPORT REQUIREMENTS

X I. Routine Report: Method Blank, Surrogate, as required
___ II. Report Dup., MS, MSD as required
___ III. Data Validation Report (includes all raw data)
___ IV. CLP Deliverable Report
___ V. EDD

INVOICE INFORMATION
P.O. # Jim Jakobiak
Bill To: PO Box 10047
Portland, OR 97296-0047

TURNAROUND REQUIREMENTS
___ 24 hr. ___ 48 hr.
___ 5 Day
X Standard (10-15 working days)
___ Provide FAX Results
Requested Report Date

Circle which metals are to be analyzed:
Total Metals: Al As Sb Ba Be B Ca Cd Co Cr (Cu) Fe (Pb) Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V (Zn) Hg
Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

*INDICATE STATE HYDROCARBON PROCEDURE: AK CA WI NORTHWEST OTHER:_____ (CIRCLE ONE)

SPECIAL INSTRUCTIONS/COMMENTS:

RELINQUISHED BY:	RECEIVED BY:	RELINQUISHED BY:	RECEIVED BY:
Signature: J. Jakobiak; Date/Time: 12/9/03 -	Signature: Amanda Jurell; Date/Time: 12/9/03 0640	Signature:	Signature:
Printed Name: Jim Jakobiak; Firm: SSI	Printed Name: Jurell; Firm: CAS	Printed Name:	Printed Name:

RCOC #1 06/03

SCHN00246252

Columbia Analytical Services, Inc. General Terms and Conditions

Laboratory Services • 1-800-695-7222

1. These Terms and Conditions embody the whole agreement of the parties in the absence of a signed and executed contract between the Laboratory ("LAB") and Client. They shall supersede all previous communications, representations, or agreements, either verbal or written, between the parties. The LAB specifically rejects all additional, inconsistent or conflicting terms, whether printed or otherwise set forth in any purchase order or other communication from the Client to LAB. The invalidity or unenforceability, in whole or in part of any provision, term or condition hereof shall not affect in any way the validity or enforceability of the remainder of the Terms and Conditions. No waiver by LAB of any provision, term or condition hereof or of any breach by or obligation of the Client hereunder shall constitute a waiver of such provision, term or condition on any other occasion or a waiver of any other breach by or obligation of the Client. This agreement shall be administered and interpreted under the laws of the state from which services are procured.

2. **Warranty.** Recognizing that the nature of many samples is unknown and that some may contain potentially hazardous components, LAB warrants only that it will perform testing services, obtain findings and prepare reports in accordance with generally accepted analytical laboratory principles and practices at the time of performance of services. LAB makes no other warranty, express or implied.

At LAB sole discretion, preliminary results may be given in advance of the laboratory report. Such preliminary results are tentative, subject to confirmation and final review by LAB. Client's use of preliminary results in any manner shall be at Client's sole risk.

3. **Scope and Compensation.** LAB agrees to perform the services described in the proposal or agreement to which these Terms and Conditions are attached. Unless the parties agree in writing to the contrary, the duties of LAB shall not be construed to exceed the services specifically described.

Payment terms are net 30 days from the date of invoice. All overdue payments are subject to an interest charge of one and one-half percent (1 1/2%) per month or a portion thereof. Client shall also be responsible for costs of collection, including payment of reasonable attorney fees if such expense is incurred. The prices, unless stated, do not include any sales, use or other taxes. Such taxes will be added to invoice prices when required. LAB reserves the right to require payment prior to release of data. Until such time as Client invoices are paid in full, LAB has no obligation, and will not defend, reproduce, return, or supplement data results.

4. **Prices.** Compensation for services performed will be based on the current Lab Analytical Fee Schedule, or on verbal quotations agreed to in writing by the parties. Unless specifically indicated on the written confirmation of quotation, analytical turnaround times are not guaranteed. The minimum charge will be $100.00 unless otherwise noted.

5. **Methods.** Where applicable, LAB will use analytical methodologies which are in substantial conformity with U.S. Environmental Protection Agency (EPA), State Agency, American Society for Testing and Materials (ASTM), Association of Official Analytical Chemists (AOAC), Standard Methods for the Examination of Water and Wastewater, or other recognized methodologies. LAB reserves the right to deviate from these methodologies, if necessary or appropriate, due to the nature or composition of the sample or otherwise, based on the reasonable judgment of LAB. Deviations, if any, will be made on a basis consistent with recognized standards of the industry and/or LAB's standard operating procedures.

6. **Limitations of Liability.** In the event of any error, omission or other professional negligence, the sole and exclusive responsibility of LAB shall be to reperform the deficient work at its own expense, and LAB shall have no other liability whatsoever. All claims shall be deemed waived unless made in writing and received by LAB within ninety (90) days following completion of services.

LAB shall have no liability, obligation or responsibility of any kind for losses, costs, expenses or other damages (including but not limited to any special, indirect, incidental or consequential damages) with respect to LAB's services or results.

All results provided by LAB are strictly for the use of its clients, and LAB is in no way responsible for the use of such results by clients or third parties. All results should be considered in their entirety, and LAB is not responsible for the separation, detachment, or other use of any portion of the results.

7. **Hazard Disclosure.** Client represents and warrants that any sample delivered to LAB will be preceded or accompanied by complete written disclosure of the presence of any hazardous substances known or suspected by Client. Client further warrants that any sample containing any hazardous substance which is to be delivered to LAB will be packaged, labeled, transported and delivered properly and in accordance with applicable laws.

8. **Sample Handling.** Prior to LAB's acceptance of any sample (or after any revocation of acceptance), the entire risk of loss of or damage to such sample remains with Client. Samples are accepted when receipt is acknowledged on chain of custody documentation. In no event will LAB have any responsibility or liability for the action or inaction of any carrier shipping or delivering any sample to or from LAB's premises.

LAB will use its best efforts to arrange for the shipment of specially prepa sample bottles, sampling instructions per Client instruction by the readily available, least cost method. Any other shipment arrangements will be at Client's expense.

Disposal of hazardous waste samples is the responsibility of the Client. If the Client does not wish such samples returned, LAB may add storage and disposal fees to the final invoice. Maximum storage time for samples is 30 days after completion of analysis, unless modified by applicable state or federal laws. Client will be required to give to LAB written instructions concerning disposal of these samples.

LAB reserves the absolute right, exercisable at any time, to refuse to receive delivery of, refuse to accept, or revoke acceptance of any sample which, in the sole judgment of LAB, (a) is of unsuitable volume, (b) may be or become unsuitable for, or may pose a risk in handling, transport or processing for any health, safety, environmental or other reason, whether or not due to the presence in the sample of any hazardous substance, and whether or not such presence has been disclosed to LAB by Client or (c) has been delivered to the LAB more than 72 hours after sampling or if one half or more of the recommended holding time for the analysis has lapsed.

9. **Legal Responsibility.** LAB is solely responsible for performance of this contract, and no affiliated company, director, officer, employee, or agent shall have any legal responsibility hereunder, whether in contract or tort, including negligence.

10. **Data Deliverables.** Where specifically requested by Client, LAB agrees to produce electronic data representing services performed hereunder, subject to the following specific understanding between the parties: LAB agrees to supply Client with electronic data as mutually defined, using an agreed medium. Client recognizes that LAB is not a software consultant, manufacturer or reseller; any transfer of electronic data pursuant to services provided by LAB is an accommodation to and strictly for the convenience of the client who is solely liable for the choice and maintenance of the medium utilized. Electronic data provided under this agreement is not deemed to be the project deliverable for the purpose of fulfilling obligations under the Agreement. The provision of electronic data does not in any way modify the intention of the parties that the Client rely on the written or hard copy form of deliverable.

Except with regard to any limited warranty as specifically set forth below, LAB disclaims and excludes all warranties express or implied with regard to the creation, transmittal or use of electronic data hereunder. The limited warranty in this Agreement replaces all other warranties, express or implied, including any warranties of merchantability or fitness for a particular purpose. Professional warranties extend to written or hard copy deliverables only and do not extend to electronic data supplied to Client. Professional warranties in the Agreement which extend to written or hard copy deliverables shall be undisturbed by this Amendment. LAB's liability for medium failure shall be limited to replacement of the electronic data with a hard copy for a period of thirty days from the date of delivery. LAB's electronic data transfer is derived in part from or is created using third party software, and no such third party warrants or assumes any liability regarding use of or undertakes to provide support information relating to LAB's electronic data. LAB will utilize anti-virus programs on a best efforts basis in preparation of the electronic data transfer, but LAB makes no warranty as to the effectiveness of such screening. LAB will also use its best efforts to ensure that its electronic data will meet all criteria as specified by Client, including criteria regarding date/time data, if, and when, included; but LAB makes no warranty as to the appropriateness of the client specified criteria by accepting the same.

In addition to indemnities contained in the underlying agreement between LAB and Client, Client shall hold LAB harmless from any claims, suits or liability arising from or related to electronic data supplied pursuant to this Agreement. Any reuse of original or altered files by Client shall be at Client's risk and without liability or responsibility to LAB, but shall entitle LAB to additional compensation for such unauthorized reuse. In no event will LAB's liability for electronic data include any special, incidental or consequential damages, whether or not LAB has knowledge of the potential for loss or damage.

11. **Force Majeure.** LAB shall have no responsibility or liability to the Client for any failure or delay in performance by LAB which results in whole or in part from any cause or circumstance beyond the reasonable control of LAB. Such causes or circumstances shall include, but not be limited to, acts of God, acts of Client, acts orders of any government authority, strikes or other labor disputes, natural disasters, accidents, wars, civil disturbances, difficulties or delays in transportation, mail or delivery services, inability to obtain sufficient services or supplies from LAB's usual suppliers, or any other cause beyond LAB's reasonable control.

CI CERTIFICATE OF ANALYSIS

CLIENT: Schnitzer Steel
ATTN: James Jakubiak
P.O. BOX 10047
Portland OR, 97296

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: 1200Z Stormwater Test

SUBMITTED: 05/10/04 15:45

REPORT DATE: 05/25/04 10:14 REPORT NUMBER: 4051010

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
4051010-01	Stormwater #1	05/08/2004	1020	Water
4051010-02	Stormwater #20	05/08/2004	1005	Water
4051010-03	Stormwater #3	05/08/2004	1030	Water
4051010-04	Stormwater #4	05/08/2004	1046	Water
4051010-05	Stormwater #5	05/08/2004	1050	Water
4051010-06	Stormwater #6	05/08/2004	1100	Water
4051010-07	Stormwater #15	05/08/2004	0950	Water
4051010-08	Stormwater #16	05/08/2004	0952	Water

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
4051010-01	**SAMPLE ID: Stormwater #1**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	6.7	mg/L	2.0	AKH	05/24/2004 08:16
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	16	mg/L	1.0	AKH	05/13/2004 13:11
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.086	mg/L	0.005	BKB	05/12/2004 15:17
LEAD - ICP		LEAD	0.160	mg/L	0.010	BKB	05/12/2004 15:17
ZINC - ICP		ZINC	0.40	mg/L	0.003	BKB	05/12/2004 15:17
4051010-02	**SAMPLE ID: Stormwater #20**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.6	mg/L	2.0	AKH	05/24/2004 08:16
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	32	mg/L	1.0	AKH	05/13/2004 13:11
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.018	mg/L	0.005	BKB	05/12/2004 15:17
LEAD - ICP		LEAD	0.025	mg/L	0.010	BKB	05/12/2004 15:17
ZINC - ICP		ZINC	0.10	mg/L	0.003	BKB	05/12/2004 15:17
4051010-03	**SAMPLE ID: Stormwater #3**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.2	mg/L	2.0	AKH	05/24/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	8.0	mg/L	1.0	AKH	05/13/2004 13:11
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.026	mg/L	0.005	BKB	05/12/2004 15:17
LEAD - ICP		LEAD	0.064	mg/L	0.010	BKB	05/12/2004 15:17
ZINC - ICP		ZINC	0.24	mg/L	0.003	BKB	05/12/2004 15:17
4051010-04	**SAMPLE ID: Stormwater #4**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2.3	mg/L	2.0	AKH	05/24/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	4.0	mg/L	1.0	AKH	05/13/2004 13:11
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.039	mg/L	0.005	BKB	05/12/2004 15:17
LEAD - ICP		LEAD	ND	mg/L	0.010	BKB	05/12/2004 15:17

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ORIGINAL

Authorized for Release By:

Richard D. Reid - Laboratory Director

COLUMBIA INSPECTION, INC 7133 N. Lombard, Portland, OR 97203 Phone:(503) 286-9464 Fax:(503) 286-5355 E-mail:lab@Columbiainspection.com

CI CERTIFICATE OF ANALYSIS

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME
4051010-04	**SAMPLE ID: Stormwater #4**						
Total Metals by Inductively Coupled Plasma							
ZINC - ICP	EPA 200.7/6010B	ZINC	0.035	mg/L	0.003	BKB	05/12/2004 15:17
4051010-05	**SAMPLE ID: Stormwater #5**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2.6	mg/L	2.0	AKH	05/24/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	8.0	mg/L	1.0	AKH	05/13/2004 13:11
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.024	mg/L	0.005	BKB	05/12/2004 15:17
LEAD - ICP		LEAD	0.036	mg/L	0.010	BKB	05/12/2004 15:17
ZINC - ICP		ZINC	0.086	mg/L	0.003	BKB	05/12/2004 15:17
4051010-06	**SAMPLE ID: Stormwater #6**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2.0	AKH	05/24/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	9.0	mg/L	1.0	AKH	05/13/2004 13:11
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.006	mg/L	0.005	BKB	05/12/2004 15:17
LEAD - ICP		LEAD	0.037	mg/L	0.010	BKB	05/12/2004 15:17
ZINC - ICP		ZINC	0.016	mg/L	0.003	BKB	05/12/2004 15:17
4051010-07	**SAMPLE ID: Stormwater #15**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	8.9	mg/L	2.0	AKH	05/24/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	240	mg/L	1.0	AKH	05/13/2004 13:11
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.19	mg/L	0.005	BKB	05/12/2004 15:17
LEAD - ICP		LEAD	0.354	mg/L	0.010	BKB	05/12/2004 15:17
ZINC - ICP		ZINC	0.66	mg/L	0.003	BKB	05/12/2004 15:17
4051010-08	**SAMPLE ID: Stormwater #16**						
General Bench Analysis							
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	3.7	mg/L	2.0	AKH	05/24/2004 09:57
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	64	mg/L	1.0	AKH	05/13/2004 13:11
Total Metals by Inductively Coupled Plasma							
COPPER - ICP	EPA 200.7/6010B	COPPER	0.15	mg/L	0.005	BKB	05/12/2004 15:17
LEAD - ICP		LEAD	0.183	mg/L	0.010	BKB	05/12/2004 15:17
ZINC - ICP		ZINC	0.36	mg/L	0.003	BKB	05/12/2004 15:17

ORIGINAL

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Authorized for Release By:Richard D. Reid - Laboratory Director

COLUMBIA INSPECTION, INC 7133 N. Lombard, Portland, OR 97203 Phone:(503) 286-9464 Fax:(503) 286-5355 E-mail:lab@ColumbiaInspection.com

SCHNITZER STEEL PRODUCTS CO.

12005 N Burgard Road, Portland, Oregon 97203
P.O. Box 10047, Portland, Oregon 97296-0047
(503) 224-9900 FAX (503) 286-6948

July 14, 2003

Mr. Dennis Jurries
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201-4987

Re: Storm Water Monitoring Results for 2002-2003 Permit #1200-Z, File #108103

Dear Mr. Jurries:

The tabulated storm water analytical data for the Schnitzer Steel Product's Co.'s facility located at 12005 North Burgard Road in Portland is attached. We have installed additional stormwater treatment systems at outfalls 1, 7 and 14 and plan to upgrade treatment systems at additional outfalls within the next few months. We continue to implement previously identified Best Management Practices (BMPs) as outlined in our revised Stormwater Pollution Control Plan. Schnitzer continues to evaluate new BMPs that are developed for possible inclusion and adoption into our overall site stormwater program.

During the past year Schnitzer Steel collected stormwater samples from outfalls on February 16, 2002 and June 20, 2003. Results of the laboratory analyses are summarized in Table 1 and provided in attached laboratory reports.

Please contact me at (503) 286-6976 if you have questions.

Sincerely,
Schnitzer Steel Products Co.

Jim Jakubiak
Environmental Administrator

Attachments: Discharge Monitoring Report
Laboratory Reports

NPDES 1200-Z General Permit for Storm Water Runoff
Discharge Monitoring Report

Complete report and send once a year by July 15 to:
Oregon DEQ NW Water Quality Div.
2020 SW 4th Ave, Suite 400
Portland, Oregon 97201-4987

Legal Name: Schnitzer Steel Products Co.

Site/File ID #: 108103

Common Name: Schnitzer Steel

County: Multnomah

Facility Location: 12005 N. Burgard Road
Portland, OR. 97203

Reporting period: July 1, 2002 to June 30, 2003

Twice a Year Sampling

Monitor for the following pollutants at the monitoring points specified in your Storm Water Pollution Control Plan (SWPCP). Add more sheets if you have more than three monitoring points. (See Attached Table)

Pollutant Sample 2/Year, Each Monitoring Point[1]	Date of Sample	Monitoring Points #	#	#
Total copper – If value exceeds 0.1 mg/l, review/revision of SWPCP required				
Total lead – If value exceeds 0.4 mg/l, review/revision of SWPCP required				
Total zinc – If value exceeds 0.6 mg/l, review/revision of SWPCP required				
pH – If value is outside of 5.5 to 9.0 S.U., review/revision of SWPCP required[2]				
Total suspended solids – If value exceeds 130 mg/l, review/revision of SWPCP required[2]				
Oil and grease – If value exceeds 10 mg/l, review/revision of SWPCP required[2]				
E. coli – If value exceeds 406 counts/100 ml, review/revision of SWPCP required. Only applies to landfills accepting septage/biosolids and sewage treatment plants.				

See reverse side for additional visual monitoring and signature for report.

[1] Monitoring frequency may be reduced under some circumstances – refer to page 10 of your permit. If monitoring requirements have been waived, please write in "WAIVED" for that pollutant.
[2] Separate effluent limits for these pollutants apply for coal fired power plants, cement plants, and/or roofing or asphalt paving operations.

Monthly Visual Observations

Parameter and Requirements	Monitoring #		Monitoring #		Monitoring #	
	Sample Date	Results	Sample Date	Results	Sample Date	Results
Oil and Grease Sheen - No visible sheen allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January	Jan 13, 2003	No Sheen				
February	Feb. 17, 2003	No Sheen				
March	March 7, 2003	No Sheen				
April	April 7, 2003	No Sheen				
May	May 16, 2003	No Sheen				
June	June 20, 2003	No Sheen				
July	July 7, 2002	No Sheen				
August (No rain)	Aug. 30, 2002	No Sheen				
September	Sept. 30 2002	No Sheen				
October	Oct. 3 2002	No Sheen				
November	Nov. 13 2002	No Sheen				
December	Dec. 10, 2002	No Sheen				
Floating Solids (associated with industrial activities) – No visible discharge allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January	Jan 13, 2003	No Discharge				
February	Feb 17 2003	No Discharge				
March	March 7, 2003	No Discharge				
April	April 7, 2003	No Discharge				
May	May 16, 2003	No Discharge				
June	June 20, 2003	No Discharge				
July	July 7, 2003	No Discharge				
August (No rain)	Aug 30, 2002	No Discharge				
September	Sept. 30 2002	No Discharge				
October	Oct. 3, 2002	No Discharge				
November	Nov. 13 2002	No Discharge				
December	Dec. 10, 2002	No Discharge				

Note – If there are any monitored results that exceed the benchmark values, you must review and revise as necessary your SWPCP within 60 days of exceeding the benchmark. SWPCP revisions must be submitted to DEQ within 14 days of completion.

Signature Requirement

I certify, under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature of Responsible Official: James L. Jakubiak

Name and Title (Please Print): James L. Jakubiak, Environmental

Date of Signature: July 14, 2003 **Telephone:** (503) 286-6776

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
1	2/16/2003	7.23	14	6.9	0.071	0.096	0.460
3	2/16/2003	7.42	106	17	0.180	0.206	1.560
	6/20/2003	7.67	4	ND	ND	ND	0.026
4	2/16/2003	8.23	ND	ND	0.240	0.007	0.040
	6/20/2003	7.85	48	7	ND	ND	0.041
5&6	2/16/2003	8.44	8	ND	0.040	0.026	0.053
7(6A)	2/16/2003	7.34	ND	ND	ND	ND	ND
14	6/20/2003	7.66	36	4	0.110	0.050	0.960
15	2/16/2003	7.68	34	5.1	0.060	0.067	0.225
16	2/16/2003	8.20	45	ND	0.071	0.114	0.427
20	2/16/2003	8.44	7	ND	ND	0.005	0.047
	6/20/2003	8.01	25	2	ND	ND	0.025

Notes:

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

July 14, 2003

Laboratory Reports and Chain of Custody Forms Excluded From These Copies, But Were Included With Submission To DEQ.

Transmittal

To: Aaron Wieting, City of Portland

From: Jim Jakubiak **Date:** 7/15/2003

Re: Annual Storm Water Monitoring Data

CC: Mat Cusma, Tom Zelenka

☐ **Urgent** ☑ **For Use** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

Attached is a copy of the 2002-2003 annual stormwater monitoring data submittal for Schnitzer Steel's Portland facility located at 12005 North Burgard Road. Included in the submittal are the monitoring results (lab reports and chain of custody) and the Monitoring Report Form. A review of the Stormwater Pollution Control Plan was completed and submitted to you this past March 2003. Please contact me at (503) 286-6976 if you have questions or comments.

1317 South 13th Avenue P.O. Box 479 Kelso, Washington 98626 (360) 577-7222 ph (360) 425-9096 fax

Columbia Analytical Services INC.
An Employee - Owned Company

February 27, 2003 Service Request No: K2301154

Jim Jakubiak
Schnitzer Steel Products Co.
P.O. Box 10047
Portland, OR 97210

RE: SSI-IT

Dear Jim:

Enclosed are the results of the rush sample(s) submitted to our laboratory on February 18, 2003. For your reference, these analyses have been assigned our service request number K2301154.

All analyses were performed according to our laboratory's quality assurance program. The test results meet requirements of the NELAC standards except as noted in the case narrative report. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please call if you have any questions. My extension is 3260.

Respectfully submitted,

Columbia Analytical Services, Inc.

Harvey Jacky
Project Chemist

HJ/jeb

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

Inorganic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
[illegible]	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.

Metals Data Qualifiers

#	The control limit criteria is not applicable. See case narrative.
B	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
E	The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
M	The duplicate injection precision was not met.
N	The Matrix Spike sample recovery is not within control limits. See case narrative.
S	The reported value was determined by the Method of Standard Additions (MSA).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
W	The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.
*	The duplicate analysis not within control limits. See case narrative.
+	The correlation coefficient for the MSA is less than 0.995.

Organic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
A	A tentatively identified compound, a suspected aldol-condensation product.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
C	The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
D	The reported result is from a dilution.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
N	The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
P	The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results (25% for CLP Pesticides).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a chromatographic interference.
X	See case narrative.

Additional Petroleum Hydrocarbon Specific Qualifiers

F	The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
L	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
H	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
O	The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
Y	The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
Z	The chromatographic fingerprint does not resemble a petroleum product.

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2301154
Project:	SSI-IT	**Date Collected:**	2/16/03
Sample Matrix:	Water	**Date Received:**	2/18/03
		Date Extracted:	NA
		Date Analyzed:	2/20/03

Solids, Total Suspended (TSS)
EPA Method 160.2
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
#1	K2301154-001	5	14
#3	K2301154-002	5	106
#4	K2301154-003	5	ND
#5/6	K2301154-004	5	8
#7 (GA)	K2301154-005	5	ND
#15	K2301154-006	5	34
#16	K2301154-007	5	45
#20	K2301154-008	5	7
Method Blank	K2301154-MB	5	ND

Approved By: _____ Date: 2/26/03

01154WET.ELI - TSS 2/26/03

SCHN00246265

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2301154
Project:	SSI-IT	**Date Collected:**	2/16/03
Sample Matrix:	Water	**Date Received:**	2/18/03
		Date Extracted:	2/21/03
		Date Analyzed:	2/25/03

Oil and Grease
EPA Method 1664
Units: mg/L (ppm)

Analyte:	**Oil & Grease, Total (HEM)**
Method Reporting Limit:	5.0

Sample Name	**Lab Code**	
#1	K2301154-001	6.9
#3	K2301154-002	17
#4	K2301154-003	ND
~~#5/6~~	K2301154-004	ND
7 (6A)	K2301154-005	ND
#15	K2301154-006	5.1
#16	K2301154-007	ND
#20	K2301154-008	ND
Method Blank	K030221-WB	ND

Approved By: JLS Date: 2/25/03

2A/120594
01154PHC.MS1 - SAMPLE 2/25/03

COLUMBIA ANALYTICAL SERVICES, INC.

- Cover Page -
INORGANIC ANALYSIS DATA PACKAGE

Client : Schnitzer Steel Products Co.
Project Name : SSI-IT
Project No. : NA

Service Request : K2301154

Sample Name :	Lab Code :
#1	K2301154-001
#3	K2301154-002
#4	K2301154-003
#5/6	K2301154-004
#7 (GP)	K2301154-005
#15	K2301154-006
#16	K2301154-007
#20	K2301154-008
Method Blank	K2301154-MB

Comments:

Approved By: _____ Date: 2/20/03

00006

SCHN00246267

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2301154
Project Name :	SSI-IT	**Date Collected :**	02/16/03
Project No. :	NA	**Date Received :**	02/18/03
Matrix :	Water	**Date Extracted :**	NA

Total Metals

Sample Name :	#1	**Units :**	ug/L (ppb)
Lab Code :	K2301154-001	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Sample Result	Result Notes
Copper	6010B	10	02/25/03	71	
Lead	7421	10	02/26/03	96	
Zinc	6010B	10	02/25/03	460	

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2301154
Project Name :	SSI-IT	**Date Collected :**	02/16/03
Project No. :	NA	**Date Received :**	02/18/03
Matrix :	Water	**Date Extracted :**	NA

Total Metals

Sample Name :	#3	**Units :**	ug/L (ppb)
Lab Code :	K2301154-002	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Sample Result	Result Notes
Copper	6010B	10	02/25/03	180	
Lead	7421	10	02/26/03	206	
Zinc	6010B	10	02/25/03	1560	

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2301154
Project Name :	SSI-IT	**Date Collected :**	02/16/03
Project No. :	NA	**Date Received :**	02/18/03
Matrix :	Water	**Date Extracted :**	NA

Total Metals

Sample Name :	#4	**Units :**	ug/L (ppb)
Lab Code :	K2301154-003	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Sample Result	Result Notes
Copper	6010B	10	02/25/03	240	
Lead	7421	4.0	02/26/03	6.8	
Zinc	6010B	10	02/25/03	40	

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2301154
Project Name :	SSI-IT	**Date Collected :**	02/16/03
Project No. :	NA	**Date Received :**	02/18/03
Matrix :	Water	**Date Extracted :**	NA

Total Metals

Sample Name :	#5/6	**Units :**	ug/L (ppb)
Lab Code :	K2301154-004	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Sample Result	Result Notes
Copper	6010B	10	02/25/03	40	
Lead	7421	4.0	02/26/03	25.6	
Zinc	6010B	10	02/25/03	53	

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2301154
Project Name :	SSI-IT	**Date Collected :**	02/16/03
Project No. :	NA	**Date Received :**	02/18/03
Matrix :	Water	**Date Extracted :**	NA

Total Metals

Sample Name :	#7 (6A)	**Units :**	ug/L (ppb)
Lab Code :	K2301154-005	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Sample Result	Result Notes
Copper	6010B	10	02/25/03	ND	
Lead	7421	4.0	02/26/03	ND	
Zinc	6010B	10	02/25/03	ND	

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2301154
Project Name :	SSI-IT	**Date Collected :**	02/16/03
Project No. :	NA	**Date Received :**	02/18/03
Matrix :	Water	**Date Extracted :**	NA

Total Metals

Sample Name :	#15	**Units :**	ug/L (ppb)
Lab Code :	K2301154-006	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Sample Result	Result Notes
Copper	6010B	10	02/25/03	60	
Lead	7421	4.0	02/26/03	67.0	
Zinc	6010B	10	02/25/03	225	

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2301154
Project Name :	SSI-IT	**Date Collected :**	02/16/03
Project No. :	NA	**Date Received :**	02/18/03
Matrix :	Water	**Date Extracted :**	NA

Total Metals

Sample Name :	#16	**Units :**	ug/L (ppb)
Lab Code :	K2301154-007	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Sample Result	Result Notes
Copper	6010B	10	02/25/03	71	
Lead	7421	10	02/26/03	114	
Zinc	6010B	10	02/25/03	427	

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2301154
Project Name :	SSI-IT	**Date Collected :**	02/16/03
Project No. :	NA	**Date Received :**	02/18/03
Matrix :	Water	**Date Extracted :**	NA

Total Metals

Sample Name :	#20	**Units :**	ug/L (ppb)
Lab Code :	K2301154-008	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Sample Result	Result Notes
Copper	6010B	10	02/25/03	ND	
Lead	7421	4.0	02/26/03	4.6	
Zinc	6010B	10	02/25/03	47	

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2301154
Project Name :	SSI-IT	**Date Collected :**	NA
Project No. :	NA	**Date Received :**	NA
Matrix :	Water	**Date Extracted :**	NA

Total Metals

Sample Name :	Method Blank	**Units :**	ug/L (ppb)
Lab Code :	K2301154-MB	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Sample Result	Result Notes
Copper	6010B	10	02/25/03	ND	
Lead	7421	2.0	02/26/03	ND	
Zinc	6010B	10	02/25/03	ND	

Comments:

Columbia Analytical Services INC
An Employee-Owned Company

CHAIN OF CUSTODY

SR#: 6301154

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222x07 • FAX (360) 636-1068

PAGE _____ OF _____ COC # _____

00016

PROJECT NAME: SSI-IT
PROJECT NUMBER:
PROJECT MANAGER: Jim Jakobsen
COMPANY/ADDRESS: PO Box 16047, Portland, OR. 97296-0047
PHONE #: (503) 286-6976 FAX #: (503) 286-6948
SAMPLER'S SIGNATURE: J. Jakobsen

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics by GC/MS 625☐ 8270☐ 8270LL☐	Volatile Organics 624☐ 8260☐	Hydrocarbons (*see below) Gas☐ 8021☐ BTEX☐ Diesel☐ Oil☐ ☐ Fuel Fingerprint (FIQ) ☐ NW-HCID Screen	Oil & Grease/TRPH 1664 HEM 1664 SGT☐	PCB's Aroclors☐ Congeners☐	Pesticides/Herbicides 608☐ 8081A☐ 8141A☐ 8151A☐	Chlorophenolics - 8151M Tri☐ Tetra☐ PCP☐	PAHs 8310☐ SIM☐	Metals, Total or Dissolved (See list below)	Cyanide☐	pH, Cond., Cl, SO_4, PO_4, F, NO_2, NO_3, BOD, (TSS) TDS (circle) NH_3-N, COD, Total-P, TKN, TOC, DOC (circle) NO_2+NO_3	Hex-Chrom☐	TOX 9020☐ AOX 1650☐ 506☐							REMARKS
#1	2-16-03	0900	1	W	3				X				X		X										
#3		0945	2		3				X				X		X										
#4		1015	3		3				X				X		X										
#5/6		1040	4		3				X				X		X										
#7(GA)		1115	5		3				X				X		X										
#15		1205	6		3				X				X		X										
#16		1210	7		3				X				X		X										
#20		1245	8		3				X				X		X										

REPORT REQUIREMENTS

X I. Routine Report: Method Blank, Surrogate, as required
___ II. Report Dup., MS, MSD as required
___ III. Data Validation Report (includes all raw data)
___ IV. CLP Deliverable Report
___ V. EDD

INVOICE INFORMATION

P.O. # _____
Bill To: Same as above

TURNAROUND REQUIREMENTS

___ 24 hr. ___ 48 hr.
X 5 Day
___ Standard (10-15 working days)
___ Provide FAX Results

Requested Report Date

Circle which metals are to be analyzed:

Total Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

*INDICATE STATE HYDROCARBON PROCEDURE: AK CA WI NORHTWEST OTHER:_____ (CIRCLE ONE)

SPECIAL INSTRUCTIONS/COMMENTS:

OR. Storm Water - Methods
Copper, Lead, Zinc
TSS
Oil + Grease

RELINQUISHED BY:	RECEIVED BY:	RELINQUISHED BY:	RECEIVED BY:
Signature: J. Jakobsen	Signature: Tracy Black	Signature	Signature
Date/Time: 2-17-03/1100	Date/Time: 2/18/03 1400	Date/Time	Date/Time
Printed Name	Printed Name: Black	Printed Name	Printed Name
Firm	Firm: CAS	Firm	Firm

RCOC #1 04/02

SCHN00246277

Columbia Analytical Services, Inc. General Terms and Conditions

Laboratory Services • 1-800-695-7222

1. These Terms and Conditions embody the whole agreement of the parties in the absence of a signed and executed contract between the Laboratory ("LAB") and Client. They shall supersede all previous communications, representations, or agreements, either verbal or written, between the parties. The LAB specifically rejects all additional, inconsistent or conflicting terms, whether printed or otherwise set forth in any purchase order or other communication from the Client to LAB. The invalidity or unenforceability, in whole or in part of any provision, term or condition hereof shall not affect in any way the validity or enforceability of the remainder of the Terms and Conditions. No waiver by LAB of any provision, term or condition hereof or of any breach by or obligation of the Client hereunder shall constitute a waiver of such provision, term or condition on any other occasion or a waiver of any other breach by or obligation of the Client. This agreement shall be administered and interpreted under the laws of the state from which services are procured.

2. **Warranty.** Recognizing that the nature of many samples is unknown and that some may contain potentially hazardous components, LAB warrants only that it will perform testing services, obtain findings and prepare reports in accordance with generally accepted analytical laboratory principles and practices at the time of performance of services. LAB makes no other warranty, express or implied.

At LAB sole discretion, preliminary results may be given in advance of the laboratory report. Such preliminary results are tentative, subject to confirmation and final review by LAB. Client's use of preliminary results in any manner shall be at Client's sole risk.

3. **Scope and Compensation.** LAB agrees to perform the services described in the proposal or agreement to which these Terms and Conditions are attached. Unless the parties agree in writing to the contrary, the duties of LAB shall not be construed to exceed the services specifically described.

Payment terms are net 30 days from the date of invoice. All overdue payments are subject to an interest charge of one and one-half percent (1 1/2%) per month or a portion thereof. Client shall also be responsible for costs of collection, including payment of reasonable attorney fees if such expense is incurred. The prices, unless stated, do not include any sales, use or other taxes. Such taxes will be added to invoice prices when required. LAB reserves the right to require payment prior to release of data. Until such time as Client invoices are paid in full, LAB has no obligation, and will not defend, reproduce, return, or supplement data results.

4. **Prices.** Compensation for services performed will be based on the current Lab Analytical Fee Schedule, or on verbal quotations agreed to in writing by the parties. Unless specifically indicated on the written confirmation of quotation, analytical turnaround times are not guaranteed. The minimum charge will be $100.00 unless otherwise noted.

5. **Methods.** Where applicable, LAB will use analytical methodologies which are in substantial conformity with U.S. Environmental Protection Agency (EPA), State Agency, American Society for Testing and Materials (ASTM), Association of Official Analytical Chemists (AOAC), Standard Methods for the Examination of Water and Wastewater, or other recognized methodologies. LAB reserves the right to deviate from these methodologies, if necessary or appropriate, due to the nature or composition of the sample or otherwise, based on the reasonable judgment of LAB. Deviations, if any, will be made on a basis consistent with recognized standards of the industry and/or LAB's standard operating procedures.

6. **Limitations of Liability.** In the event of any error, omission or other professional negligence, the sole and exclusive responsibility of LAB shall be to reperform the deficient work at its own expense, and LAB shall have no other liability whatsoever. All claims shall be deemed waived unless made in writing and received by LAB within ninety (90) days following completion of services.

LAB shall have no liability, obligation or responsibility of any kind for losses, costs, expenses or other damages (including but not limited to any special, indirect, incidental or consequential damages) with respect to LAB's services or results.

All results provided by LAB are strictly for the use of its clients, and LAB is in no way responsible for the use of such results by clients or third parties. All results should be considered in their entirety, and LAB is not responsible for the separation, detachment, or other use of any portion of the results.

7. **Hazard Disclosure.** Client represents and warrants that any sample delivered to LAB will be preceded or accompanied by complete written disclosure of the presence of any hazardous substances known or suspected by Client. Client further warrants that any sample containing any hazardous substance which is to be delivered to LAB will be packaged, labeled, transported and delivered properly and in accordance with applicable laws.

8. **Sample Handling.** Prior to LAB's acceptance of any sample (or after any revocation of acceptance), the entire risk of loss of or damage to such sample remains with Client. Samples are accepted when receipt is acknowledged on chain of custody documentation. In no event will LAB have any responsibility or liability for the action or inaction of any carrier shipping or delivering any sample to or from [illegible]'s premises.

LAB will use its best efforts to arrange for the shipment of specially prepared sample bottles, sampling instructions per Client instruction by the readily available, least cost method. Any other shipment arrangements will be at Client's expense.

Disposal of hazardous waste samples is the responsibility of the Client. If the Client does not wish such samples returned, LAB may add storage and disposal fees to the final invoice. Maximum storage time for samples is 30 days after completion of analysis, unless modified by applicable state or federal laws. Client will be required to give to LAB written instructions concerning disposal of these samples.

LAB reserves the absolute right, exercisable at any time, to refuse to receive delivery of, refuse to accept, or revoke acceptance of any sample which, in the sole judgment of LAB, (a) is of unsuitable volume, (b) may be or become unsuitable for, or may pose a risk in handling, transport or processing for any health, safety, environmental or other reason, whether or not due to the presence in the sample of any hazardous substance, and whether or not such presence has been disclosed to LAB by Client or (c) has been delivered to the LAB more than 72 hours after sampling or if one half or more of the recommended holding time for the analysis has lapsed.

9. **Legal Responsibility.** LAB is solely responsible for performance of this contract, and no affiliated company, director, officer, employee, or agent shall have any legal responsibility hereunder, whether in contract or tort, including negligence.

10. **Data Deliverables.** Where specifically requested by Client, LAB agrees to produce electronic data representing services performed hereunder, subject to the following specific understanding between the parties: LAB agrees to supply Client with electronic data as mutually defined, using an agreed medium. Client recognizes that LAB is not a software consultant, manufacturer or reseller; any transfer of electronic data pursuant to services provided by LAB is an accommodation to and strictly for the convenience of the client who is solely liable for the choice and maintenance of the medium utilized. Electronic data provided under this agreement is not deemed to be the project deliverable for the purpose of fulfilling obligations [illegible] the Agreement. The provision of electronic data does not in any way modi[illegible] [illegible]e intention of the parties that the Client rely on the written or hard copy form of the deliverable.

Except with regard to any limited warranty as specifically set forth below, LAB disclaims and excludes all warranties express or implied with regard to the creation, transmittal or use of electronic data hereunder. The limited warranty in this Agreement replaces all other warranties, express or implied, including any warranties of merchantability or fitness for a particular purpose. Professional warranties extend to written or hard copy deliverables only and do <u>not</u> extend to electronic data supplied to Client. Professional warranties in the Agreement which extend to written or hard copy deliverables shall be undisturbed by this Amendment. LAB's liability for medium failure shall be limited to replacement of the electronic data with a hard copy for a period of thirty days from the date of delivery. LAB's electronic data transfer is derived in part from or is created using third party software, and no such third party warrants or assumes any liability regarding use of or undertakes to provide support information relating to LAB's electronic data. LAB will utilize anti-virus programs on a best efforts basis in preparation of the electronic data transfer, but LAB makes no warranty as to the effectiveness of such screening. LAB will also use its best efforts to ensure that its electronic data will meet all criteria as specified by Client, including criteria regarding date/time data, if, and when, included: but LAB makes no warranty as to the appropriateness of the client specified criteria by accepting the same.

In addition to indemnities contained in the underlying agreement between LAB and Client, Client shall hold LAB harmless from any claims, suits or liability arising from or related to electronic data supplied pursuant to this Agreement. Any reuse of original or altered files by Client shall be at Client's risk and without liability or responsibility to LAB, but shall entitle LAB to additional compensation for such unauthorized reuse. In no event will LAB's liability for electronic data include any special, incidental or consequential damages, whether or not LAB has knowledge of the potential for loss or damage.

11. **Force Majeure.** LAB shall have no responsibility or liability to the Client fr[illegible] [illegible]y failure or delay in performance by LAB which results in whole or in part fr[illegible] [illegible] cause or circumstance beyond the reasonable control of LAB. Such causes and circumstances shall include, but not be limited to, acts of God, acts of Client, acts or orders of any government authority, strikes or other labor disputes, natural disasters, accidents, wars, civil disturbances, difficulties or delays in transportation, mail or delivery services, inability to obtain sufficient services or supplies from LAB's usual suppliers, or any other cause beyond LAB's reasonable control.

CI CERTIFICATE OF ANALYSIS

ORIGINAL

CLIENT: Schnitzer Steel
P.O. BOX 10047
Portland OR, 97296
ATTN: James Jakubiak

PHONE: (503) 286-6976
FAX: (503) 286-6948

PROJECT NAME: Stormwater:1200Z

SUBMITTED: 06/23/03 17:06

REPORT DATE: 07/03/03 16:55 REPORT NUMBER: 3062310

CI SAMPLE	CLIENTS ID#	DATE	TIME	MATRIX
3062310-01	Stormwater #3	06/20/2003	1350	Water
3062310-02	Stormwater #4	06/20/2003	1410	Water
3062310-03	Stormwater #14	06/20/2003	1245	Water
3062310-04	Stormwater #20	06/20/2003	1320	Water

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME	WARNING FLAGS
3062310-01	**SAMPLE ID: Stormwater #3**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	ND	mg/L	2	PA	07/03/2003 09:14	
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	4.0	mg/L	1.0	RGR	06/30/2003 00:00	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.001	GW	06/24/2003 15:14	
LEAD - ICP		LEAD	ND	mg/L	0.001	GW	06/24/2003 15:14	
ZINC - ICP		ZINC	0.026	mg/L	0.001	GW	06/24/2003 15:14	
3062310-02	**SAMPLE ID: Stormwater #4**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	7	mg/L	2	PA	07/03/2003 09:14	
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	48	mg/L	1.0	RGR	06/30/2003 00:00	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.001	GW	06/24/2003 15:14	
LEAD - ICP		LEAD	ND	mg/L	0.001	GW	06/24/2003 15:14	
ZINC - ICP		ZINC	0.041	mg/L	0.001	GW	06/24/2003 15:14	
3062310-03	**SAMPLE ID: Stormwater #14**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	4	mg/L	2	PA	07/03/2003 09:14	
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	36	mg/L	1.0	RGR	06/30/2003 00:00	
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	0.11	mg/L	0.001	GW	06/24/2003 15:14	
LEAD - ICP		LEAD	0.050	mg/L	0.001	GW	06/24/2003 15:14	
ZINC - ICP		ZINC	0.96	mg/L	0.001	GW	06/24/2003 15:14	
3062310-04	**SAMPLE ID: Stormwater #20**							
General Bench Analysis								
O & G, TOTAL (HEM)	EPA 1664	TOTAL OIL AND GREASE	2	mg/L	2	PA	07/03/2003 09:14	
SUSPENDED SOLIDS	EPA 160.2	TOTAL SUSPENDED SOLIDS	25	mg/L	1.0	RGR	06/30/2003 00:00	
Total Metals by Inductively Coupled Plasma								

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Authorized for Release By:

David T. Back - Quality/Systems Manager

COLUMBIA INSPECTION, INC 7133 N. Lombard, Portland, OR 97203 Phone:(503) 286-9464 Fax:(503) 286-5355 E-mail:lab@ColumbiaInspection.com

CI CERTIFICATE OF ANALYSIS

ORIGINAL

SAMPLE/ ANALYSIS	METHOD	PARAMETER	RESULTS	UNITS	DETECTION LIMIT	TECH	DATE/TIME	WARNING FLAGS
3062310-04	**SAMPLE ID: Stormwater #20**							
Total Metals by Inductively Coupled Plasma								
COPPER - ICP	EPA 200.7/6010B	COPPER	ND	mg/L	0.001	GW	06/24/2003 15:14	
LEAD - ICP		LEAD	ND	mg/L	0.001	GW	06/24/2003 15:14	
ZINC - ICP		ZINC	0.025	mg/L	0.001	GW	06/24/2003 15:14	

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Authorized for Release By: David T. Back - Quality/Systems Manager

COLUMBIA INSPECTION, INC 7133 N. Lombard, Portland, OR 97203 Phone:(503) 286-9464 Fax:(503) 286-5355 E-mail:lab@ColumbiaInspection.com

COLUMBIA INSPECTION, INC.

CHAIN OF CUSTODY RECORD
AND
NON-COMMERCIAL BILL OF LADING

☒ 7133 N. Lombard, Portland, OR 97203 — Ph: (503) 286-9464 Fax: (503) 285-7831
☐ 4901 E. 20th Street, Fife, WA 98424 — Ph: (253) 922-8781 Fax: (253) 922-8957
☐ 4592 East 2nd Street, Suite A, Benicia, CA 94510 — Ph: (707) 748-7587 Fax: (707) 748-7764
☐ 797 Channel Street, San Pedro, CA 90731 — Ph: (310) 833-1557 Fax: (310) 833-1585

Customer Name: SSI - Portland
Attention: Jim Jakubiak
Address: P.O. Box 10047
Phone: (503) 286-6576
FAX: (503) 286-6948
Sampler: [signature] ☒-Submitted

Project Name: SSI - Portland
Project Number:
P.O. Number:
Testing Priority: ☒ Normal ☐ Rush
Notification Method(s): ☐ Telephone ☐ FAX ☐ Mail
Due Date:

Analyses To Be Performed

Sample id#	Sample Description/UN Number	Sample Matrix	Sample Date	Sample Time	Oil and Grease (Hexane)	Total Metals (Copper, Zinc, Lead)	TSS
#3		Water	6/20/03	1350	X	X	X
#4		Water	6/20/03	1410	X	X	X
#14		Water	6/20/03	1245	X	X	X
#20		Water	6/20/03	1320	X	X	X

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	6/23/03 1450		
Relinquished By:	Date/Time	Received By: [signature]	Date/Time 6/23/03 1450

FOR LABORATORY USE ONLY

Inspection Job Number: _____ PO # _____
Laboratory Project Number: _____ ☐ Cash/Check # _____
Due Date: _____ Amount Paid: $_____

White Copy - Laboratory Yellow Copy - Client Copy

CI Form 100 (COC) Rev B7/7/99

SCHN00246281

Sample Acceptance Policy

All samples must meet the following requirements:

- **Chain of Custody:** The COC list of samples must match the number and type of sample containers received, and sample descriptions on the COC must match the sample bottles. The requested tests and where possible, specific methods are shown on the COC.
- **Appropriate Container:** The correct sample containers must be used for the requested analyses.
- **Sample Volume:** There must be sufficient sample volume for the test(s) requested.
- **Holding Time:** The holding times for the requested analyses must not be expired.

Environmental samples must meet the following additional requirements:

- **Sample Temperature:** Samples that require refrigeration shall be considered acceptable if the temperature as measured upon receipt is either within 2° C of the required temperature or the method specified range. For samples with a specified temperature of 4° C, samples received at temperatures ranging from just above freezing to 6° C shall be acceptable.

  NOTE: **Samples that are delivered to the laboratory shortly after sampling may not meet this criterion. However, the samples shall be considered acceptable if there is evidence that the chilling process has begun such as arrival on ice, or if the samples were taken within the hour.**

- **Sample Preservation:** Where possible without sacrificing the integrity of the sample, determine whether the sample bottle has been preserved correctly.

Discrepancies:

If there is any doubt as to the suitability for testing such as the **sample does not conform to the sample description**, the sample containers are **damaged, leaking**, or **may be contaminated from other damaged or leaking sample containers**, or where **testing is not specified**, further instructions from the client are required. If the issue cannot be resolved and the sample does not meet sample acceptance criteria the laboratory shall either.

- Fully document any decision to proceed with the analysis and note the condition of the sample on the COC and work order; or
- Retain correspondence and/or records of conversations regarding the final disposition of rejected samples.

Rejected Samples:

- Should the client choose to proceed with testing on questionable samples, the Work Order must be clearly marked with the nature of the problem so that the final report data may be appropriately qualified.
- Rejected samples must still be logged into LIMS to obtain a unique sample identification number to track sample disposition. However, for rejected samples, no testing is assigned. Instead, the sample status is set to "Rejected" by editing the work order status using the Update Status function of the Laboratory menu in LIMS.

Refer to the Columbia Inspection, Inc. Laboratory Policy, LP00.01, Sample Acceptance Policy and SOP15.01 Sample Receipt for complete details.

Sample Disposal:

- Samples are disposed of after 45 days unless prior arrangements have been made with the laboratory.
- Samples that are deemed hazardous may be returned to the client for proper disposal.

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

Water Pollution Control Laboratory
6543 N. Burlington Ave., Portland, Oregon 97203-5452
(503) 823-5600

Date: June 30, 2003

To: SCHNITZER STEEL INTERNATIONAL

From: City of Portland Industrial Stormwater Program

Subject: Annual Stormwater Monitoring Data Submittal

Dear: MATT CUSMA:

PLEASE IGNORE THE FOLLOWING IF YOU HAVE ALREADY SUBMITTED YOUR COMPLETE MONITORING DATA PACKET. As the holder of a 1200-Z NPDES Stormwater Permit, you are required to conduct two (2) monitoring events per sample point between July 1 and June 30. Your permit requires copies of your monitoring data to be submitted to the Oregon Department of Environmental Quality (DEQ) and the City of Portland. In addition, the permit requires that a copy of your monthly visual observations be sent to the DEQ. It is not necessary to submit copies of your monthly visual monitoring data to the City

Please complete the Monitoring Report Form (copy for future use) on the back of this sheet and submit it with your laboratory reports and chain of custody forms to the City If there were any exceedances of your benchmarks for either of your required sampling events, submit the required review of your Stormwater Pollution Control Plan (SWPCP) with this report if you have not already done so. **The data submittal deadline is July 15, 2003.**

Please submit your monitoring results and a copy of the visual observations to:

Mr. Dennis Jurries
Oregon Department of Environmental Quality
Northwest Water Quality Division
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987

Please submit your monitoring results (lab reports and chain of custody) and Monitoring Report Form to:

Attention: Wieting, Aaron
City of Portland
Industrial Stormwater Program
6543 N Burlington Avenue
Portland, OR 97203-5452

If you have any questions regarding this matter, please contact me at 503.823.7383 or Dennis Jurries of DEQ at 503.229.5937. Thank you.

Sincerely,

Wieting, Aaron

Industrial Source Control Division

INDUSTRIAL STORMWATER

NPDES 1200-COLS MONITORING REPORT

Industry Name: **SCHNITZER STEEL INTERNATIONAL**

Site Address: **12005 N BURGARD RD, PORTLAND, OR**

The permittee shall monitor stormwater **twice** per year for the parameters outlined in their NPDES 1200-Z Stormwater Discharge Permit Schedule B.1.a., and submit results to the City as stated in Schedule D.2.

Stormwater samples were taken for the above permittee, on these days and at these sample points:

Sample Date(s)	Sample Point(s)

The permittee shall submit by **July 15** of each year a copy of the **laboratory analysis reports,** which show analytical methods and detection limits, for stormwater samples collected for the previous monitoring year (July 1-June 30).

❑ **Monitoring Waiver Reduction Notification:**
Check the box if your facility is exercising a waiver of monitoring based on meeting benchmarks listed in Schedule A.9., AND site conditions have not changed to impact stormwater run-off. Note: This does not exclude your facility from notifying DEQ about the waiver of monitoring. Please read Schedule B of the permit to clearly understand the monitor waiver reduction guidelines. If waiver request is for select pollutants, list the parameters excluded from monitoring: _____.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Title: _____

Date: _____

Transmittal

To: Aaron Weiting

From: Jim Jakubiak **Date:** 7/15/2002

Re: Annual Stormwater Monitoring Data

CC:

☐ Urgent ☑ For Use ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Attached is the annual stormwater monitoring data submittal for Schnitzer Steel's Portland facility located at 12005 North Burgard Road. Included in the submittal are the monitoring results and Monitoring Report Form. A review of our Stormwater Pollution Control Plan (SWPCP) has been completed. The revised SWPCP will be submitted to BES when construction at outfall 1 is completed at the end of this summer.

Bureau of Environmental Services

Industrial Source Control Division

INDUSTRIAL STORMWATER

NPDES 1200-Z MONITORING REPORT

Industry Name: **SCHNITZER STEEL INTERNATIONAL**

Site Address: **12005 N BURGARD RD, PORTLAND, OR**

The permittee shall monitor stormwater **twice** per year for the parameters outlined in their NPDES 1200-Z Stormwater Discharge Permit Schedule B.1.a., and submit results to the City as stated in Schedule D.2.

Stormwater samples were taken for the above permittee, on these days and at these sample points:

Sample Date(s)	Sample Point(s)
October 30, 2001	Outfalls 2, 3, 4, 5/6, 7, 14, 20
May 22, 2002	Outfalls 2, 3, 5/6, 7, 17

The permittee shall submit by **July 15** of each year a copy of the **laboratory analysis reports**, which show analytical methods and detection limits, for stormwater samples collected for the previous monitoring year (July 1-June 30).

☐ **Monitoring Waiver Reduction Notification:**
Check the box if your facility is exercising a waiver of monitoring based on meeting benchmarks listed in Schedule A.9., AND site conditions have not changed to impact stormwater run-off. Note: This does not exclude your facility from notifying DEQ about the waiver of monitoring. Please read Schedule B of the permit to clearly understand the monitor waiver reduction guidelines. If waiver request is for select pollutants, list the parameters excluded from monitoring: _____.

☐ **No Exposure Certification:**
Check the box if your facility is required to have a NPDES 1200-Z permit, but monitoring is not required due to no exposure of stormwater to industrial activities. This no exposure certification is outlined in Schedule B.3.b, and the facility meets the requirements of Schedule B.1.e. Note: This does not exclude your facility from notifying DEQ.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: James L Jakubisch

Title: Environmental Administrator

Date: July 12, 2002

SCHN00246286

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
2	10/30/2001	7.04	14	5.0	0.081	0.153	1.040
	5/22/2002	7.22	13	13.0	0.170	0.024	0.268
3	10/30/2001	7.19	10	5.0	0.099	0.070	0.252
	5/22/2002	7.38	11	ND	0.019	ND	0.076
4	10/30/2001	7.94	ND	ND	0.045	0.014	0.040
	5/22/2002	NA	NA	NA	NA	NA	NA
5&6	10/30/2001	7.76	10	ND	0.027	0.028	0.082
	5/22/2002	7.91	ND	ND	0.013	ND	0.015
7	10/30/2001	8.10	36	ND	0.034	0.059	0.231
	5/22/2002	8.42	59	ND	0.025	0.016	0.106
14	10/30/2001	7.67	156	ND	0.193	0.286	1.230
17	5/22/2002	7.09	73	7.1	0.144	0.164	0.654
20	10/30/2001	8.23	28	ND	0.018	0.028	0.057

Notes:

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

Columbia Analytical Services INC.
An Employee-Owned Company

November 30, 2001

Service Request No: K2108270

Jim Jakubiak
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97296-0047

Re: SSI-IT

Dear Jim:

Enclosed are the results of the sample(s) submitted to our laboratory on 11/7/01. For your reference, these analyses have been assigned our service request number K2108270.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please call if you have any questions. My extension is 3260.

Respectfully submitted,

Columbia Analytical Services, Inc.

Harvey Jacky
Project Chemist

HJ/dj

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 360/ 577-7222 • Fax 360/636-1068

Inorganic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.

Metals Data Qualifiers

#	The control limit criteria is not applicable. See case narrative.
B	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
E	The reported value is estimated because of the presence of matrix interference.
M	The duplicate injection precision was not met.
N	The Matrix Spike sample recovery is not within control limits. See case narrative.
S	The reported value was determined by the Method of Standard Additions (MSA).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
W	The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.
*	The duplicate analysis not within control limits. See case narrative.
+	The correlation coefficient for the MSA is less than 0.995.

Organic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
A	A tentatively identified compound, a suspected aldol-condensation product.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
C	The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
D	The reported result is from a dilution.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
N	The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
P	The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results (25% for CLP Pesticides).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a chromatographic interference.
X	See case narrative.

Additional Petroleum Hydrocarbon Specific Qualifiers

F	The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
L	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
H	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
O	The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
Y	The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
Z	The chromatographic fingerprint does not resemble a petroleum product.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Steel Products Co.	**Service Request No.:**	K2108270
Project:	SSI-IT	**Date Received:**	11/7/01
Sample Matrix:	Water		

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of Columbia Analytical Services, Inc. (CAS). This report contains analytical results for samples designated for Tier I data deliverables. When appropriate to the method, method blank results have been reported with each analytical test.

Sample Receipt

Seven water samples were received for analysis at Columbia Analytical Services on 11/7/01. The samples were received in good condition and consistent with the accompanying chain of custody form. The samples were stored in a refrigerator at 4°C upon receipt at the laboratory.

Inorganic Parameters

No anomalies associated with the analysis of these samples were observed.

Total Metals

No anomalies associated with the analysis of these samples were observed.

Oil and Grease by EPA Method 1664

No anomalies associated with the analysis of these samples were observed.

Approved by _____ **Date** 11/22/01

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSI-IT
Sample Matrix: Water

Service Request: K2108270
Date Collected: 10/30/01
Date Received: 11/07/01
Date Extracted: NA
Date Analyzed: 11/07/01

Solids, Total Suspended (TSS)
EPA Method 160.2
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
#2	K2108270-001	5	14
#3	K2108270-002	5	10
#4	K2108270-003	5	ND
#5/#6	K2108270-004	5	10
#7	K2108270-005	5	36
#14	K2108270-006	5	156
#20	K2108270-007	5	28
Method Blank	K2108270-MB	5	ND

Approved By: Mike Smith Date: 11/14/01

1AMRL/102594

08270WET.DM1 - TSS 11/14/01

SCHN00246292

COLUMBIA ANALYTICAL SERVICES, INC.

- Cover Page -
INORGANIC ANALYSIS DATA PACKAGE

Client : Schnitzer Steel Products Co.
Project Name : SSI-IT
Project No. : NA

Service Request : K2108270

Sample Name :	Lab Code :
#2	K2108270-001
#3	K2108270-002
#4	K2108270-003
#5/#6	K2108270-004
#7	K2108270-005
#14	K2108270-006
#20	K2108270-007
Method Blank	K2108270-MB

Comments:

Approved By: Eilen M Aurel

Date: 11/28/01

00006

SCHN00246293

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2108270
Project Name :	SSI-IT	**Date Collected :**	10/30/01
Project No. :	NA	**Date Received :**	11/07/01
Matrix :	Water	**Date Extracted :**	11/13/01

Total Metals

Sample Name :	#2	**Units :**	ug/L (ppb)
Lab Code :	K2108270-001	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	6010B	10	11/21/01	81	
Lead	7421	10	11/15/01	153	
Zinc	6010B	10	11/21/01	1040	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2108270
Project Name :	SSI-IT	**Date Collected :**	10/30/01
Project No. :	NA	**Date Received :**	11/07/01
Matrix :	Water	**Date Extracted :**	11/13/01

Total Metals

Sample Name :	#3	**Units :**	ug/L (ppb)
Lab Code :	K2108270-002	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	6010B	10	11/21/01	99	
Lead	7421	2.0	11/15/01	70.4	
Zinc	6010B	10	11/21/01	252	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2108270
Project Name :	SSI-IT	**Date Collected :**	10/30/01
Project No. :	NA	**Date Received :**	11/07/01
Matrix :	Water	**Date Extracted :**	11/13/01

Total Metals

Sample Name :	#4	**Units :**	ug/L (ppb)
Lab Code :	K2108270-003	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	6010B	10	11/21/01	45	
Lead	7421	2.0	11/15/01	13.6	
Zinc	6010B	10	11/21/01	40	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2108270
Project Name :	SSI-IT	**Date Collected :**	10/30/01
Project No. :	NA	**Date Received :**	11/07/01
Matrix :	Water	**Date Extracted :**	11/13/01

Total Metals

Sample Name :	#5/#6	**Units :**	ug/L (ppb)
Lab Code :	K2108270-004	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	6010B	10	11/21/01	27	
Lead	7421	2.0	11/15/01	27.6	
Zinc	6010B	10	11/21/01	82	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2108270
Project Name :	SSI-IT	**Date Collected :**	10/30/01
Project No. :	NA	**Date Received :**	11/07/01
Matrix :	Water	**Date Extracted :**	11/13/01

Total Metals

Sample Name :	#7	**Units :**	ug/L (ppb)
Lab Code :	K2108270-005	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	6010B	10	11/21/01	34	
Lead	7421	4.0	11/15/01	59.2	
Zinc	6010B	10	11/21/01	231	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2108270
Project Name :	SSI-IT	**Date Collected :**	10/30/01
Project No. :	NA	**Date Received :**	11/07/01
Matrix :	Water	**Date Extracted :**	11/13/01

Total Metals

Sample Name :	#14	**Units :**	ug/L (ppb)
Lab Code :	K2108270-006	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	6010B	10	11/21/01	193	
Lead	7421	20	11/15/01	286	
Zinc	6010B	10	11/21/01	1230	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2108270
Project Name :	SSI-IT	**Date Collected :**	10/30/01
Project No. :	NA	**Date Received :**	11/07/01
Matrix :	Water	**Date Extracted :**	11/13/01

Total Metals

Sample Name :	#20	**Units :**	ug/L (ppb)
Lab Code :	K2108270-007	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	6010B	10	11/21/01	18	
Lead	7421	2.0	11/15/01	28.2	
Zinc	6010B	10	11/21/01	57	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2108270
Project Name :	SSI-IT	**Date Collected :**	NA
Project No. :	NA	**Date Received :**	NA
Matrix :	Water	**Date Extracted :**	11/13/01

Total Metals

Sample Name :	Method Blank	**Units :**	ug/L (ppb)
Lab Code :	K2108270-MB	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	6010B	10	11/21/01	ND	
Lead	7421	2.0	11/15/01	ND	
Zinc	6010B	10	11/21/01	ND	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2108270
Project:	SSI-IT	**Date Collected:**	10/30/01
Sample Matrix:	Water	**Date Received:**	11/7/01
		Date Extracted:	11/14/01
		Date Analyzed:	11/14/01

Oil and Grease
EPA Method 1664
Units: mg/L (ppm)

	Oil & Grease, Total
Analyte:	**(HEM)**
Method Reporting Limit:	5.0

Sample Name	**Lab Code**	
#2	K2108270-001	5.0
#3	K2108270-002	5.0
#4	K2108270-003	ND
#5/#6	K2108270-004	ND
#7	K2108270-005	ND
#14	K2108270-006	ND
#20	K2108270-007	ND
Method Blank	K011114-WB	ND

Approved By: M Culer Date: 11/20/01 00015

2A/120594
08270PHC.TF1 - SAMPLE 11/19/01

Page No.:

SCHN00246302

Columbia Analytical Services INC
An Employee-Owned Company

CHAIN OF CUSTODY

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

SR#: K2108278

PAGE 1 OF 1 COC #

PROJECT NAME: SSI-IT
PROJECT NUMBER:
PROJECT MANAGER: Jim Jakubiak
COMPANY/ADDRESS: PO Box 10047, Portland, OR. 97296-0047
PHONE #: (503) 286-6976 FAX #: (503) 286-6948
SAMPLER'S SIGNATURE: [signature]

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics by GC/MS 625 ☐ 8270 ☐	Volatile Organics 624 ☐ 8260 ☐ 8021 ☐ BTEX ☐	Hydrocarbons (*see below) Gas ☐ Diesel ☐ Oil ☐	☐ Fuel Fingerprint (FIQ) ☐ NW-HCID Screen	Oil & Grease/TRPH 413.1 ☐ 418.1 ☐ 1664 SGT ☒ 1664 HEM ☒	PCB's Aroclors ☐ Congeners ☐	Pesticides/Herbicides 608 ☐ 8081A ☐ 8141A ☐ 8151A ☐	Chlorophenolics - 8151M Tri ☐ Tetra ☐ PCP ☐	PAHS 8310 ☐ SIM ☐	GC/MS-SIM PAH ☐ Phenol ☐ Phthalates ☐ (Metals, Total or Dissolved (See list below)	Cyanide ☐ Hex-Chrom ☐	pH, Cond, Cl, SO4, PO4, F, NO2, NO3, BOD, TSS, TDS (circle)	NH3-N, COD, Total-P, TKN, TOC, DOC (circle)	TOX 9020 ☐ AOX 1650 ☐ 506 ☐					REMARKS
#2	10/30	1505	1	W	3					X						X		X							
#3	10/30	1515	2	W	3					X						X		X							
#4	10/30	1525	3	W	3					X						X		X							
#5/#6	10/30	1530	4	W	3					X						X		X							
#7	10/30	1545	5	W	3					X						X		X							
#14	10/30	1600	6	W	3					X						X		X							
#20	10/30	1630	7	W	3					X						X		X							

REPORT REQUIREMENTS

- X I. Routine Report: Method Blank, Surrogate, as required
- ___ II. Report Dup., MS, MSD as required
- ___ III. Data Validation Report (includes all raw data)
- ___ IV. CLP Deliverable Report
- ___ V. EDD

INVOICE INFORMATION

P.O. #
Bill To: Address Above

TURNAROUND REQUIREMENTS

- ___ 24 hr. ___ 48 hr.
- ___ 5 Day
- X Standard (10-15 working days)
- ___ Provide FAX Results

Requested Report Date

Circle which metals are to be analyzed:

Total Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

*INDICATE STATE HYDROCARBON PROCEDURE: AK CA WI NORHTWEST OTHER:_____ (CIRCLE ONE)

SPECIAL INSTRUCTIONS/COMMENTS:

RELINQUISHED BY:		RECEIVED BY:		RELINQUISHED BY:		RECEIVED BY:	
[signature]	11/6/01 Noon	Stacy Black	11/09/01 2835				
Signature	Date/Time	Signature	Date/Time	Signature	Date/Time	Signature	Date/Time
Printed Name	Firm	Printed Name	Firm	Printed Name	Firm	Printed Name	Firm

RCOC #1 04/01

SCHN00246303

Columbia Analytical Services, Inc. General Terms and Conditions

Laboratory Services • 1-800-695-7222

1. These Terms and Conditions embody the whole agreement of the parties in the absence of a signed and executed contract between the Laboratory ("LAB") and Client. They shall supersede all previous communications, representations, or agreements, either verbal or written, between the parties. The LAB specifically rejects all additional, inconsistent or conflicting terms, whether printed or otherwise set forth in any purchase order or other communication from the Client to LAB. The invalidity or unenforceability, in whole or in part of any provision, term or condition hereof shall not affect in any way the validity or enforceability of the remainder of the Terms and Conditions. No waiver by LAB of any provision, term or condition hereof or of any breach by or obligation of the Client hereunder shall constitute a waiver of such provision, term or condition on any other occasion or a waiver of any other breach by or obligation of the Client. This agreement shall be administered and interpreted under the laws of the state from which services are procured.

2. **Warranty.** Recognizing that the nature of many samples is unknown and that some may contain potentially hazardous components, LAB warrants only that it will perform testing services, obtain findings and prepare reports in accordance with generally accepted analytical laboratory principles and practices at the time of performance of services. LAB makes no other warranty, express or implied.

At LAB sole discretion, preliminary results may be given in advance of the laboratory report. Such preliminary results are tentative, subject to confirmation and final review by LAB. Client's use of preliminary results in any manner shall be at Client's sole risk.

3. **Scope and Compensation.** LAB agrees to perform the services described in the proposal or agreement to which these Terms and Conditions are attached. Unless the parties agree in writing to the contrary, the duties of LAB shall not be construed to exceed the services specifically described.

Payment terms are net 30 days from the date of invoice. All overdue payments are subject to an interest charge of one and one-half percent (1 1/2%) per month or a portion thereof. Client shall also be responsible for costs of collection, including payment of reasonable attorney fees if such expense is incurred. The prices, unless stated, do not include any sales, use or other taxes. Such taxes will be added to invoice prices when required. LAB reserves the right to require payment prior to release of data. Until such time as Client invoices are paid in full, LAB has no obligation, and will not defend, reproduce, return, or supplement data results.

4. **Prices.** Compensation for services performed will be based on the current Lab Analytical Fee Schedule, or on verbal quotations agreed to in writing by the parties. Unless specifically indicated on the written confirmation of quotation, analytical turnaround times are not guaranteed. The minimum charge will be $100.00 unless otherwise noted.

5. **Methods.** Where applicable, LAB will use analytical methodologies which are in substantial conformity with U.S. Environmental Protection Agency (EPA), State Agency, American Society for Testing and Materials (ASTM), Association of Official Analytical Chemists (AOAC), Standard Methods for the Examination of Water and Wastewater, or other recognized methodologies. LAB reserves the right to deviate from these methodologies, if necessary or appropriate, due to the nature or composition of the sample or otherwise, based on the reasonable judgment of LAB. Deviations, if any, will be made on a basis consistent with recognized standards of the industry and/or LAB's standard operating procedures.

6. **Limitations of Liability.** In the event of any error, omission or other professional negligence, the sole and exclusive responsibility of LAB shall be to reperform the deficient work at its own expense, and LAB shall have no other liability whatsoever. All claims shall be deemed waived unless made in writing and received by LAB within ninety (90) days following completion of services.

LAB shall have no liability, obligation or responsibility of any kind for losses, costs, expenses or other damages (including but not limited to any special, indirect, incidental or consequential damages) with respect to LAB's services or results.

All results provided by LAB are strictly for the use of its clients, and LAB is in no way responsible for the use of such results by clients or third parties. All results should be considered in their entirety, and LAB is not responsible for the separation, detachment, or other use of any portion of the results.

7. **Hazard Disclosure.** Client represents and warrants that any sample delivered to LAB will be preceded or accompanied by complete written disclosure of the presence of any hazardous substances known or suspected by Client. Client further warrants that any sample containing any hazardous substance which is to be delivered to LAB will be packaged, labeled, transported and delivered properly and in accordance with applicable laws.

8. **Sample Handling.** Prior to LAB's acceptance of any sample (or after any revocation of acceptance), the entire risk of loss of or damage to such sample remains with Client. Samples are accepted when receipt is acknowledged on chain of custody documentation. In no event will LAB have any responsibility or liability for the action or inaction of any carrier shipping or delivering any sample to or from LAB's premises.

LAB will use its best efforts to arrange for the shipment of specially prepared sample bottles, sampling instructions per Client instruction by the readily available, least cost method. Any other shipment arrangements will be at Client's expense.

Disposal of hazardous waste samples is the responsibility of the Client. If the Client does not wish such samples returned, LAB may add storage and disposal fees to the final invoice. Maximum storage time for samples is 30 days after completion of analysis, unless modified by applicable state or federal laws. Client will be required to give to LAB written instructions concerning disposal of these samples.

LAB reserves the absolute right, exercisable at any time, to refuse to receive delivery of, refuse to accept, or revoke acceptance of any sample which, in the sole judgment of LAB, (a) is of unsuitable volume, (b) may be or become unsuitable for, or may pose a risk in handling, transport or processing for any health, safety, environmental or other reason, whether or not due to the presence in the sample of any hazardous substance, and whether or not such presence has been disclosed to LAB by Client or (c) has been delivered to the LAB more than 72 hours after sampling or if one half or more of the recommended holding time for the analysis has lapsed.

9. **Legal Responsibility.** LAB is solely responsible for performance of this contract, and no affiliated company, director, officer, employee, or agent shall have any legal responsibility hereunder, whether in contract or tort, including negligence.

10. **Data Deliverables.** Where specifically requested by Client, LAB agrees to produce electronic data representing services performed hereunder, subject to the following specific understanding between the parties: LAB agrees to supply Client with electronic data as mutually defined, using an agreed medium. Client recognizes that LAB is not a software consultant, manufacturer or reseller; any transfer of electronic data pursuant to services provided by LAB is an accommodation to and strictly for the convenience of the client who is solely liable for the choice and maintenance of the medium utilized. Electronic data provided under this agreement is not deemed to be the project deliverable for the purpose of fulfilling obligations under the Agreement. The provision of electronic data does not in any way modify the intention of the parties that the Client rely on the written or hard copy form of the deliverable.

Except with regard to any limited warranty as specifically set forth below, LAB disclaims and excludes all warranties express or implied with regard to the creation, transmittal or use of electronic data hereunder. The limited warranty in this Agreement replaces all other warranties, express or implied, including any warranties of merchantability or fitness for a particular purpose. Professional warranties extend to written or hard copy deliverables only and do not extend to electronic data supplied to Client. Professional warranties in the Agreement which extend to written or hard copy deliverables shall be undisturbed by this Amendment. LAB's liability for medium failure shall be limited to replacement of the electronic data with a hard copy for a period of thirty days from the date of delivery. LAB's electronic data transfer is derived in-part from or is created using third party software, and no such third party warrants or assumes any liability regarding use of or undertakes to provide support information relating to LAB's electronic data. LAB will utilize anti-virus programs on a best efforts basis in preparation of the electronic data transfer, but LAB makes no warranty as to the effectiveness of such screening. LAB will also use its best efforts to ensure that its electronic data will meet all criteria as specified by Client, including criteria regarding date/time data, if, and when, included; but LAB makes no warranty as to the appropriateness of the client specified criteria by accepting the same.

In addition to indemnities contained in the underlying agreement between LAB and Client, Client shall hold LAB harmless from any claims, suits or liability arising from or related to electronic data supplied pursuant to this Agreement. Any reuse of original or altered files by Client shall be at Client's risk and without liability or responsibility to LAB, but shall entitle LAB to additional compensation for such unauthorized reuse. In no event will LAB's liability for electronic data include any special, incidental or consequential damages, whether or not LAB has knowledge of the potential for loss or damage.

11. **Force Majeure.** LAB shall have no responsibility or liability to the Client for any failure or delay in performance by LAB which results in whole or in part from a cause or circumstance beyond the reasonable control of LAB. Such causes or circumstances shall include, but not be limited to, acts of God, acts of Client, acts or orders of any government authority, strikes or other labor disputes, natural disasters, accidents, wars, civil disturbances, difficulties or delays in transportation, mail or delivery services, inability to obtain sufficient services or supplies from LAB's usual suppliers, or any other cause beyond LAB's reasonable control.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

Columbia Analytical Services INC.
An Employee-Owned Company

June 14, 2002

Service Request No: K2203402

Jim Jakubiak
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97296-0047

Re: SSI-IT

Dear Jim:

Enclosed are the results of the sample(s) submitted to our laboratory on May 24, 2002. For your reference, these analyses have been assigned our service request number K2203402.

All analyses were performed according to our laboratory's quality assurance program. The test results meet requirements of the NELAC standards except as noted in the case narrative report. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please call if you have any questions. My extension is 3260.

Respectfully submitted,

Columbia Analytical Services, Inc.

Harvey Jacky
Project Chemist

HJ/jeb

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 360/ 577-7222 • Fax 360/636-1068

Inorganic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.

Metals Data Qualifiers

#	The control limit criteria is not applicable. See case narrative.
B	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
E	The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
M	The duplicate injection precision was not met.
N	The Matrix Spike sample recovery is not within control limits. See case narrative.
S	The reported value was determined by the Method of Standard Additions (MSA).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
W	The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.
*	The duplicate analysis not within control limits. See case narrative.
+	The correlation coefficient for the MSA is less than 0.995.

Organic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
A	A tentatively identified compound, a suspected aldol-condensation product.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
C	The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
D	The reported result is from a dilution.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
N	The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
P	The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results (25% for CLP Pesticides).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a chromatographic interference.
X	See case narrative.

Additional Petroleum Hydrocarbon Specific Qualifiers

F	The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
L	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
H	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
O	The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
Y	The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
Z	The chromatographic fingerprint does not resemble a petroleum product.

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Steel Products Co.	**Service Request No.:**	K2203402
Project:	SSI-IT	**Date Received:**	5/24/02
Sample Matrix:	Water		

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of Columbia Analytical Services, Inc. (CAS). This report contains analytical results for samples designated for Tier I data deliverables. When appropriate to the method, method blank results have been reported with each analytical test.

Sample Receipt

Five water samples were received for analysis at Columbia Analytical Services on 5/24/02. The samples were received in good condition and consistent with the accompanying chain of custody form. The samples were stored in a refrigerator at 4°C upon receipt at the laboratory.

Inorganic Parameters

No anomalies associated with the analysis of these samples were observed.

Total Metals

No anomalies associated with the analysis of these samples were observed.

Oil and Grease by EPA Method 1664

No anomalies associated with the analysis of these samples were observed.

Approved by _____ **Date** 6/14/02

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSI-IT
Sample Matrix: Water

Service Request: K2203402
Date Collected: 05/22/02
Date Received: 05/24/02
Date Extracted: NA
Date Analyzed: 05/25/02

Solids, Total Suspended (TSS)
EPA Method 160.2
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
#2	K2203402-001	5	13
#3	K2203402-002	5	11
#5/6	K2203402-003	5	ND
#7	K2203402-004	5	59
#17	K2203402-005	5	73
Method Blank	K2203402-MB	5	ND

Approved By: _____ Date: 6/10/02

1AMRL/102594

03402WET.DM1 - TSS 06/10/02

00005

SCHN00246309

COLUMBIA ANALYTICAL SERVICES, INC.

- Cover Page -
INORGANIC ANALYSIS DATA PACKAGE

Client : Schnitzer Steel Products Co.
Project Name : SSI-IT
Project No. : NA

Service Request : K2203402

Sample Name :	Lab Code :
#2	K2203402-001
#3	K2203402-002
#5/6	K2203402-003
#7	K2203402-004
#17	K2203402-005
Method Blank	K2203402-MB

Comments:

Approved By: _____ Date: 6/22/02

00006

SCHN00246310

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2203402
Project Name :	SSI-IT	**Date Collected :**	05/22/02
Project No. :	NA	**Date Received :**	05/24/02
Matrix :	Water	**Date Extracted :**	05/31/02

Total Metals

Sample Name :	#2	**Units :**	ug/L (ppb)
Lab Code :	K2203402-001	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	6010B	10	06/07/02	17	
Lead	7421	2.0	06/01/02	23.6	
Zinc	6010B	10	06/07/02	268	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2203402
Project Name :	SSI-IT	**Date Collected :**	05/22/02
Project No. :	NA	**Date Received :**	05/24/02
Matrix :	Water	**Date Extracted :**	05/31/02

Total Metals

Sample Name :	#3	**Units :**	ug/L (ppb)
Lab Code :	K2203402-002	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	6010B	10	06/07/02	19	
Lead	7421	2.0	06/01/02	ND	
Zinc	6010B	10	06/07/02	76	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	Service Request :	K2203402
Project Name :	SSI-IT	Date Collected :	05/22/02
Project No. :	NA	Date Received :	05/24/02
Matrix :	Water	Date Extracted :	05/31/02

Total Metals

Sample Name :	#5/6	Units :	ug/L (ppb)
Lab Code :	K2203402-003	Basis :	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	601OB	10	06/07/02	13	
Lead	742 1	2.0	06/01/02	ND	
Zinc	601OB	10	06/07/02	15	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2203402
Project Name :	SSI-IT	**Date Collected :**	05/22/02
Project No. :	NA	**Date Received :**	05/24/02
Matrix :	Water	**Date Extracted :**	05/31/02

Total Metals

Sample Name :	#7	**Units :**	ug/L (ppb)
Lab Code :	K2203402-004	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	6010B	10	06/07/02	25	
Lead	7421	2.0	06/01/02	15.9	
Zinc	6010B	10	06/07/02	106	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2203402
Project Name :	SSI-IT	**Date Collected :**	05/22/02
Project No. :	NA	**Date Received :**	05/24/02
Matrix :	Water	**Date Extracted :**	05/31/02

Total Metals

Sample Name :	#17	**Units :**	ug/L (ppb)
Lab Code :	K2203402-005	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	6010B	10	06/07/02	144	
Lead	7421	40	06/01/02	164	
Zinc	6010B	10	06/07/02	654	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client :	Schnitzer Steel Products Co.	**Service Request :**	K2203402
Project Name :	SSI-IT	**Date Collected :**	NA
Project No. :	NA	**Date Received :**	NA
Matrix :	Water	**Date Extracted :**	05/31/02

Total Metals

Sample Name :	Method Blank	**Units :**	ug/L (ppb)
Lab Code :	K2203402-MB	**Basis :**	NA

Analyte	Analysis Method	MRL	Date Analyzed	Result	Result Notes
Copper	6010B	10	06/07/02	ND	
Lead	7421	2.0	06/01/02	ND	
Zinc	6010B	10	06/07/02	ND	

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2203402
Project:	SSI-IT	**Date Collected:**	5/22/02
Sample Matrix:	Water	**Date Received:**	5/24/02
		Date Extracted:	6/5/02
		Date Analyzed:	6/5/02

Oil and Grease
EPA Method 1664
Units: mg/L (ppm)

	Oil & Grease, Total
Analyte:	**(HEM)**
Method Reporting Limit:	5.0

Sample Name	**Lab Code**	
#2	K2203402-001	13
#3	K2203402-002	ND
#5/6	K2203402-003	ND
#7	K2203402-004	ND
#17	K2203402-005	7.1
Method Blank	K020605-WB	ND

Approved By: MM Curlu Date: 6/6/02

2A/120594
03402PHC.TF1 - SAMPLE 6/5/02

Columbia Analytical Services INC.
An Employee-Owned Company

CHAIN OF CUSTODY

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

SR#: K2203402

PAGE 1 OF 1 COC #

PROJECT NAME: SSI-IT
PROJECT NUMBER:
PROJECT MANAGER: Jim Jakubiak
COMPANY/ADDRESS: Po. Box 10047 Portland OR. 97296-0047
PHONE #: (503) 286-6976 FAX #: (503) 286-6948
SAMPLER'S SIGNATURE: Jim Jakubiak

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics by GC/MS 625 ☐ 8270 ☐	Volatile Organics 624 ☐ 8260 ☐ 8021 ☐ BTEX ☐	Hydrocarbons (*see below) Gas ☐ Diesel ☐ Oil ☐	☐ Fuel Fingerprint (FIQ) ☐ NW-HCID Screen	Oil & Grease/TRPH 413.1 ☐ 418.1 ☐ 1664 SGT ☐ 1664 HEM ☒	PCB's Aroclors ☐ Congeners ☐	Pesticides/Herbicides 608 ☐ 8081A ☐ 8141A ☐ 8151A ☐	Chlorophenolics - 8151M Tri ☐ Tetra ☐ PCP ☐	PAHS 8310 ☐ SIM ☐	GC/MS-SIM PAH ☐ Phenol ☐ Phthalates ☐	Metals, Total or Dissolved (See list below)	Cyanide ☐ Hex-Chrom ☐	pH, Cond., Cl, SO4, PO4, F, NO2, NO3, BOD, (TSS) TDS (circle)	NH3-N, COD, Total-P, TKN, TOC, DOC (circle)	TOX 9020 ☐ AOX 1650 ☐ 506 ☐					REMARKS
#2	5/22	1700	1	W	3					X						X		X								
#3	5/22	1650	2	W	3					X						X		X								
#5/6	5/22	1640	3	W	3					X						X		X								
#7	5/22	1635	4	W	3					X						X		X								
#17	5/22	1616	5	W	3					X						X		X								

00014

REPORT REQUIREMENTS

- X I. Routine Report: Method Blank, Surrogate, as required
- ___ II. Report Dup., MS, MSD as required
- ___ III. Data Validation Report (includes all raw data)
- ___ IV. CLP Deliverable Report
- ___ V. EDD

INVOICE INFORMATION

P.O. #
Bill To: Address Above

TURNAROUND REQUIREMENTS

- ___ 24 hr. ___ 48 hr.
- ___ 5 Day
- X Standard (10-15 working days)
- ___ Provide FAX Results

Requested Report Date

Circle which metals are to be analyzed:

Total Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

*INDICATE STATE HYDROCARBON PROCEDURE: AK CA WI NORHTWEST OTHER:_____ (CIRCLE ONE)

SPECIAL INSTRUCTIONS/COMMENTS:

RELINQUISHED BY:	RECEIVED BY:	RELINQUISHED BY:	RECEIVED BY:
Signature: Jim Jakubiak Date/Time: 5/24/02 2 noon	Signature: [signature] Date/Time: 5/24/02	Signature: Date/Time:	Signature: Date/Time:
Printed Name: Firm:	Printed Name: A Maynter Firm: CAS	Printed Name: Firm:	Printed Name: Firm:

RCOC #1 04/01

SCHN00246318

Columbia Analytical Services, Inc. General Terms and Conditions

Laboratory Services • 1-800-695-7222

1. These Terms and Conditions embody the whole agreement of the parties in the absence of a signed and executed contract between the Laboratory ("LAB") and Client. They shall supersede all previous communications, representations, or agreements, either verbal or written, between the parties. The LAB specifically rejects all additional, inconsistent or conflicting terms, whether printed or otherwise set forth in any purchase order or other communication from the Client to LAB. The invalidity or unenforceability, in whole or in part of any provision, term or condition hereof shall not affect in any way the validity or enforceability of the remainder of the Terms and Conditions. No waiver by LAB of any provision, term or condition hereof or of any breach by or obligation of the Client hereunder shall constitute a waiver of such provision, term or condition on any other occasion or a waiver of any other breach by or obligation of the Client. This agreement shall be administered and interpreted under the laws of the state from which services are procured.

2. **Warranty.** Recognizing that the nature of many samples is unknown and that some may contain potentially hazardous components, LAB warrants only that it will perform testing services, obtain findings and prepare reports in accordance with generally accepted analytical laboratory principles and practices at the time of performance of services. LAB makes no other warranty, express or implied.

At LAB sole discretion, preliminary results may be given in advance of the laboratory report. Such preliminary results are tentative, subject to confirmation and final review by LAB. Client's use of preliminary results in any manner shall be at Client's sole risk.

3. **Scope and Compensation.** LAB agrees to perform the services described in the proposal or agreement to which these Terms and Conditions are attached. Unless the parties agree in writing to the contrary, the duties of LAB shall not be construed to exceed the services specifically described.

Payment terms are net 30 days from the date of invoice. All overdue payments are subject to an interest charge of one and one-half percent (1 1/2%) per month or a portion thereof. Client shall also be responsible for costs of collection, including payment of reasonable attorney fees if such expense is incurred. The prices, unless stated, do not include any sales, use or other taxes. Such taxes will be added to invoice prices when required. LAB reserves the right to require payment prior to release of data. Until such time as Client invoices are paid in full, LAB has no obligation, and will not defend, reproduce, return, or supplement data results.

4. **Prices.** Compensation for services performed will be based on the current Lab Analytical Fee Schedule, or on verbal quotations agreed to in writing by the parties. Unless specifically indicated on the written confirmation of quotation, analytical turnaround times are not guaranteed. The minimum charge will be $100.00 unless otherwise noted.

5. **Methods.** Where applicable, LAB will use analytical methodologies which are in substantial conformity with U.S. Environmental Protection Agency (EPA), State Agency, American Society for Testing and Materials (ASTM), Association of Official Analytical Chemists (AOAC), Standard Methods for the Examination of Water and Wastewater, or other recognized methodologies. LAB reserves the right to deviate from these methodologies, if necessary or appropriate, due to the nature or composition of the sample or otherwise, based on the reasonable judgment of LAB. Deviations, if any, will be made on a basis consistent with recognized standards of the industry and/or LAB's standard operating procedures.

6. **Limitations of Liability.** In the event of any error, omission or other professional negligence, the sole and exclusive responsibility of LAB shall be to reperform the deficient work at its own expense, and LAB shall have no other liability whatsoever. All claims shall be deemed waived unless made in writing and received by LAB within ninety (90) days following completion of services.

LAB shall have no liability, obligation or responsibility of any kind for losses, costs, expenses or other damages (including but not limited to any special, indirect, incidental or consequential damages) with respect to LAB's services or results.

All results provided by LAB are strictly for the use of its clients, and LAB is in no way responsible for the use of such results by clients or third parties. All results should be considered in their entirety, and LAB is not responsible for the separation, detachment, or other use of any portion of the results.

7. **Hazard Disclosure.** Client represents and warrants that any sample delivered to LAB will be preceded or accompanied by complete written disclosure of the presence of any hazardous substances known or suspected by Client. Client further warrants that any sample containing any hazardous substance which is to be delivered to LAB will be packaged, labeled, transported and delivered properly and in accordance with applicable laws.

8. **Sample Handling.** Prior to LAB's acceptance of any sample (or after any revocation of acceptance), the entire risk of loss of or damage to such sample remains with Client. Samples are accepted when receipt is acknowledged on chain of custody documentation. In no event will LAB have any responsibility or liability for the action or inaction of any carrier shipping or delivering any sample to or from LAB's premises.

LAB will use its best efforts to arrange for the shipment of specially prepared sample bottles, sampling instructions per Client instruction by the readily available, least cost method. Any other shipment arrangements will be at Client's expense.

Disposal of hazardous waste samples is the responsibility of the Client. If the Client does not wish such samples returned, LAB may add storage and disposal fees to the final invoice. Maximum storage time for samples is 30 days after completion of analysis, unless modified by applicable state or federal laws. Client will be required to give to LAB written instructions concerning disposal of these samples.

LAB reserves the absolute right, exercisable at any time, to refuse to receive delivery of, refuse to accept, or revoke acceptance of any sample which, in the sole judgment of LAB, (a) is of unsuitable volume, (b) may be or become unsuitable for, or may pose a risk in handling, transport or processing for any health, safety, environmental or other reason, whether or not due to the presence in the sample of any hazardous substance, and whether or not such presence has been disclosed to LAB by Client or (c) has been delivered to the LAB more than 72 hours after sampling or if one half or more of the recommended holding time for the analysis has lapsed.

9. **Legal Responsibility.** LAB is solely responsible for performance of this contract, and no affiliated company, director, officer, employee, or agent shall have any legal responsibility hereunder, whether in contract or tort, including negligence.

10. **Data Deliverables.** Where specifically requested by Client, LAB agrees to produce electronic data representing services performed hereunder, subject to the following specific understanding between the parties: LAB agrees to supply Client with electronic data as mutually defined, using an agreed medium. Client recognizes that LAB is not a software consultant, manufacturer or reseller; any transfer of electronic data pursuant to services provided by LAB is an accommodation to and strictly for the convenience of the client who is solely liable for the choice and maintenance of the medium utilized. Electronic data provided under this agreement is not deemed to be the project deliverable for the purpose of fulfilling obligations under the Agreement. The provision of electronic data does not in any way modify the intention of the parties that the Client rely on the written or hard copy form of the deliverable.

Except with regard to any limited warranty as specifically set forth below, LAB disclaims and excludes all warranties express or implied with regard to the creation, transmittal or use of electronic data hereunder. The limited warranty in this Agreement replaces all other warranties, express or implied, including any warranties of merchantability or fitness for a particular purpose. Professional warranties extend to written or hard copy deliverables only and do <u>not</u> extend to electronic data supplied to Client. Professional warranties in the Agreement which extend to written or hard copy deliverables shall be undisturbed by this Amendment. LAB's liability for medium failure shall be limited to replacement of the electronic data with a hard copy for a period of thirty days from the date of delivery. LAB's electronic data transfer is derived in part from or is created using third party software, and no such third party warrants or assumes any liability regarding use of or undertakes to provide support information relating to LAB's electronic data. LAB will utilize anti-virus programs on a best efforts basis in preparation of the electronic data transfer, but LAB makes no warranty as to the effectiveness of such screening. LAB will also use its best efforts to ensure that its electronic data will meet all criteria as specified by Client, including criteria regarding date/time data, if, and when, included; but LAB makes no warranty as to the appropriateness of the client specified criteria by accepting the same.

In addition to indemnities contained in the underlying agreement between LAB and Client, Client shall hold LAB harmless from any claims, suits or liability arising from or related to electronic data supplied pursuant to this Agreement. Any reuse of original or altered files by Client shall be at Client's risk and without liability or responsibility to LAB, but shall entitle LAB to additional compensation for such unauthorized reuse. In no event will LAB's liability for electronic data include any special, incidental or consequential damages, whether or not LAB has knowledge of the potential for loss or damage.

11. **Force Majeure.** LAB shall have no responsibility or liability to the Client for any failure or delay in performance by LAB which results in whole or in part from any cause or circumstance beyond the reasonable control of LAB. Such causes and circumstances shall include, but not be limited to, acts of God, acts of Client, acts or orders of any government authority, strikes or other labor disputes, natural disasters, accidents, wars, civil disturbances, difficulties or delays in transportation, mail or delivery services, inability to obtain sufficient services or supplies from LAB's usual suppliers, or any other cause beyond LAB's reasonable control.

SCHNITZER STEEL PRODUCTS CO.

12005 N Burgard Road, Portland, Oregon 97203
P.O. Box 10047, Portland, Oregon 97296-0047
(503) 224-9900 FAX (503) 286-6948

July 12, 2002

Mr. Dennis Jurries
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201-4987

Re: Storm Water Monitoring Results for 2001-2002 Permit #1200-Z, File #108103

Dear Mr. Jurries:

The tabulated storm water analytical data for the Schnitzer Steel Product's Co.'s facility located at 12005 North Burgard Road in Portland is attached. We have installed additional stormwater treatment systems at outfalls 3, 4, 5, and 6, and plan to upgrade treatment systems at outfalls 1 and 7 within the next few months. We continue to implement previously identified Best Management Practices (BMPs) as outlined in our Stormwater Pollution Control Plan. Schnitzer continues to evaluate new BMPs that are developed for possible inclusion and adoption into our overall site stormwater program.

During the past year Schnitzer Steel collected stormwater samples from outfalls on October 30, 2001 and May 22, 2002. Results of the laboratory analyses are summarized in Table 1 and provided in attached laboratory reports.

On April 10, 2002, Aaron Wieting of the City of Portland Environmental Services (Industrial Storm Water Program) conducted a Facility Storm Water Inspection. Mr. Weiting concluded the results of the inspection were satisfactory and Schnitzer Steel appears to be meeting conditions of their permit. A copy of the inspection letter can be forwarded to you upon request.

Please contact me at (503) 286-6976 if you have questions.

Sincerely,
Schnitzer Steel Products Co.

Jim Jakubiak
Environmental Administrator

Attachments: Discharge Monitoring Report
Laboratory Reports

NPDES 1200-Z General Permit for Storm Water Runoff
Discharge Monitoring Report

DEQ

Complete report and send once a year by July 15 to:
Oregon DEQ
NW Water Quality Division
2020 SW 4th Ave, Suite 400
Portland, OR 97201-4987

Legal Name: Schnitzer Steel Products Co.

Common Name: Schnitzer Steel Products Co.

Facility Location: 1200 N. Burgard Road
Portland, OR. 97203

Site/File ID #:

County:

Reporting period: July 1, 2001 to June 30, 2002

Twice a Year Sampling

Monitor for the following pollutants at the monitoring points specified in your Storm Water Pollution Control Plan (SWPCP). Add more sheets if you have more than three monitoring points. (See Attached Table)

Pollutant Sample 2/Year, Each Monitoring Point[1]	Date of Sample	Monitoring Points #	 #	 #
Total copper – If value exceeds 0.1 mg/l, review/revision of SWPCP required				
Total lead – If value exceeds 0.4 mg/l, review/revision of SWPCP required				
Total zinc – If value exceeds 0.6 mg/l, review/revision of SWPCP required				
pH – If value is outside of 5.5 to 9.0 S.U., review/revision of SWPCP required[2]				
Total suspended solids – If value exceeds 130 mg/l, review/revision of SWPCP required[2]				
Oil and grease– If value exceeds 10 mg/l, review/revision of SWPCP required[2]				
E. coli – If value exceeds 406 counts/100 ml, review/revision of SWPCP required. Only applies to landfills accepting septage/biosolids and sewage treatment plants.				

See reverse side for additional visual monitoring and signature for report.

[1]Monitoring frequency may be reduced under some circumstances – refer to page 10 of your permit. If monitoring requirements have been waived, please write in "WAIVED" for that pollutant.
[2] Separate effluent limits for these pollutants apply for coal fired power plants, cement plants, and/or roofing or asphalt paving operations.

Monthly Visual Observations

Parameter and Requirements	Monitoring # All outfalls		Monitoring #		Monitoring #	
	Sample Date	Results	Sample Date	Results	Sample Date	Results
Oil and Grease Sheen - No visible sheen allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January	1/7/02	None				
February	2/19/02	None				
March	3/11/02	None				
April	4/9/02	None				
May	5/22/02	None				
June	6/21/02	None				
July	7/16/01	None				
August 8/22/01	No Discharge					
September 9/26/01	No Discharge					
October	10/29/01	None				
November	11/13/01	None				
December	12/13/01	None				
Floating Solids (associated with industrial activities) – No visible discharge allowed. Monthly observation when discharging. For months when no discharges occur, please write in "No Discharge" for that month.						
January	1/7/02	None				
February	2/19/02	None				
March	3/11/02	None				
April	4/9/02	None				
May	5/22/02	None				
June	6/21/02	None				
July	7/16/02	None				
August	8/22/01	None				
September	9/26/01	None				
October	10/29/01	None				
November	11/13/01	None				
December	12/13/01	None				

Note – If there are any monitored results that exceed the benchmark values, you must review and revise as necessary your SWPCP within 60 days of exceeding the benchmark. SWPCP revisions must be submitted to DEQ within 14 days of completion.

Signature Requirement

I certify, under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature of Responsible Official: James L. Jakubiak

Name and Title (Please Print): James L. Jakubiak

Date of Signature: July 12, 2002 **Telephone:** (503) 286-6976

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

Water Pollution Control Laboratory
6543 N. Burlington Ave., Portland, Oregon 97203-5452
(503) 823-5600

Date: June 11, 2002

To: SCHNITZER STEEL INTERNATIONAL

From: City of Portland Industrial Stormwater Program

Subject: Annual Stormwater Monitoring Data Submittal

Dear: MATT CUSMA:

As the holder of a 1200-Z NPDES Stormwater Permit, you are required to conduct two (2) monitoring events per sample point between July 1 and June 30. Your permit requires copies of your monitoring data to be submitted to the Oregon Department of Environmental Quality (DEQ) and the City of Portland. In addition, the permit requires that a copy of your monthly visual observations be sent to the DEQ. It is not necessary to submit copies of your monthly visual monitoring data to the City

Please complete the enclosed Monitoring Report Form (copy for future use) and submit it with your laboratory reports and chain of custody forms to the City If there were any exceedances of your benchmarks for either of your required sampling events, submit the required review of your Stormwater Pollution Control Plan (SWPCP) with this report if you have not already done so. **The data submittal deadline is July 15, 2002.**

Please submit your monitoring results and a copy of the visual observations to:

Mr. Dennis Jurries
Oregon Department of Environmental Quality
Northwest Water Quality Division
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987

Please submit your monitoring results (lab reports and chain of custody) and Monitoring Report Form to:

Attention: Aaron Wieting
City of Portland
Industrial Stormwater Program
6543 N Burlington Avenue
Portland, OR 97203-5452

If you have any questions regarding this matter, please contact me at 503.823.7383 or Dennis Jurries of DEQ at 503.229.5937. Thank you.

Sincerely,

Aaron Wieting

Enclosure

Memorandum

To: File

CC: Tom Zelenka

From: Jim Jakubiak

Date: 5/22/02

Re: Telephone call with Aaron Weeding (BES SW Inspector)

This memorandum documents the telephone conversation I had with Aaron Weeding of the BES Stormwater Division at approximately 4:00pm on 5/22/02. I called Aaron and told him I was calling him to let him know I was going to stormwater sample today. I told him it started to rain about 30 minutes ago and it would be a good time to sample.

(Background)

Aaron performed a stormwater inspection earlier this year (approximately one month earlier). He asked soon after the inspection that we call him the next time we sample. He wanted to collect duplicate stormwater samples when we sampled.

Aaron said he was just leaving for the day. I told him it was important that I collect samples today because we've just had a significant dry spell and I wasn't sure when it would rain next and I was concerned I'd miss the permit window to collect samples. He said he understood and he'd see me next year. I asked if that meant that I could go ahead and sample and he said yes.

I told him to have a good evening.

Conversation ended.

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

Water Pollution Control Laboratory
6543 N. Burlington Ave., Portland, Oregon 97203-5452
(503) 823-5600

April 23, 2002

Mr. Matt Cusma
Schnitzer Steel Industries, Inc.
PO Box 10047
Portland, OR 97296-0047

Subject: Annual Facility Storm Water Inspection

Dear Mr. Cusma:

On April 10, 2002, City of Portland staff conducted an inspection of your facility, located at 12005 N. Burgard, for compliance with conditions contained in its NPDES 1200-Z Storm Water Permit. Overall, the results of the inspection were satisfactory and Schnitzer Steel Industries appears to be meeting the conditions of their permit.

During the inspection, we discussed the update to your Storm Water Pollution Control Plan (SWPCP) that is currently in progress. I have conducted a brief review of your SWPCP which is very complete and appears to meet virtually all of the permit requirements; however, I have the following comments:

SWPCP Required Elements

- Estimates of impervious surface area for each drainage basin must be included in the SWPCP (Schedule A, 2.a.iv).

SWPCP Recommended Elements

The following elements are not required; however, it is recommended that they be included in your SWPCP:

- Title page information including DEQ site or file number, county of site, site contact information, and mailing address (when different from site address);
- Outfall location description (i.e., freefall to receiving waters, submerged, etc.);
- A Non-Stormwater Discharge Certification;
- Sampling procedures for the various outfalls (i.e., sample from freefall at end of pipe, sampling port, etc.); and
- The following emergency phone number should be included in Appendix B of your Spill Prevention Control & Countermeasure (SPCC) Plan: City of Portland – Spill Hotline 503-823-7180.

Enclosed for your use is a blank copy of the SWPCP Checklist that the City uses to review SWPCPs as they are received.

It was a pleasure to meet you and your assistance with the inspection is appreciated. If you have any questions regarding this matter, please contact me at (503) 823-7383. Thank you.

Sincerely,

Aaron B. Wieting, R.G., C.H.M.M.
Environmental Technician
Industrial Storm Water Section

ABW:abw

c: Jim Jakubiak

STORMWATER POLLUTION CONTROL PLAN (SWPCP) WORKSHEET FOR 1200-Z

Industry name_____ ORG ID_____

PLAN REQUIREMENTS

Plan Certification

	YES	NO
Has an authorized representative of the facility signed the plan? [See Permit for appropriate signature based on type of business (i.e. Corporation, partnership, etc.)]		

Site Description

	YES	NO
Description of Industrial Activities		
Description of Significant Materials		
Descriptions of Waste Products		

	YES	NO
Methods of Storage		
Methods of Material Usage		
Methods of Disposal of Wastes		

Site Map

	YES	NO	N/A
Drainage Patterns			
Drainage & Discharge Structures			
Outline of Drainage area for each outfall			
Outfall Locations			
Paved areas and Buildings			
Pollution Control Structures			
Haz. Materials loading, storage etc.			
Springs, Wetlands, Surface Water Bodies			

	YES	NO	N/A
Industrial Activity Areas			
Storage Areas			
Manufacturing Areas			
Waste Disposal Areas			
Material Loading/Unloading Area			
Wells, seepage pits, drywells, etc.			
Sample Points			

	YES	NO
Is a general location map included in the plan?		

Impervious Surface – *Estimate of Impervious surface of each Stormwater Outfall in square feet.*

BASIN 1	*BASIN 2*	*BASIN 3*	*BASIN 4*	*BASIN 5*	*BASIN 6*	*TOTAL*

Potential Pollutants

	YES	NO
Within each drainage basin have Potential Pollutants been identified that may impact stormwater?		

Receiving Water(s) and Outfall

	YES	NO
Has receiving waterbody, including the MS4 discharge point (where applicable) been identified?		
Have the outfalls been identified and labeled?		
Have the outfalls that will be sampled been identified and described (Text and Site Map)?		

Site Controls – Best Management Practices (BMPs)

	YES	NO
Are the BMPs used at the site described in the SWPCP?		
Is an implementation schedule for BMPs not yet implemented included in the plan?		

Where applicable, are BMPs concerning the following activities included in the SWPCP?

	YES	NO	N/A
Containment			
Oil & Grease (O/ W Sep, CBs, etc.)			
Waste Chemicals & Material Disposal			
Covering Activities (Fueling, storage, etc)			

	YES	NO	N/A
Erosion & Sediment Control			
Debris Controls			
Storm Water Diversion			
Housekeeping (Sweeping, etc.)			

	YES	NO
Are Spill Prevention and Response Procedures described in the plan?		
Are the following Preventative Maintenance Procedures included in the plan?		
Monthly Inspections of areas of potential spills or industrial activities		
Monthly Inspections of SW control measures, structures, CBs and treatment facilities		
As-needed Cleaning, Maintenance & Repair of all materials handling/Storage area and SW control measures, structures, CBs, and treatment facilities		
Has an Employee Orientation and Education program been developed and included in the plan?		

Record Keeping and Internal Reporting Procedures

	YES	NO
Has a procedure (log, checklist, etc) been developed to record inspection, maintenance, repair and education activities been developed and included in the SWPCP?		
Has a procedure (log, checklist, etc) been developed to record spills at or above reportable quantities		

RECOMMENDED INCLUSIONS

Title page

	YES	NO
Name of Site		
Name of Site Operator		
DEQ Site or File Number		
County of Site		

	YES	NO
Revision date (Day, Month, Year)		
Contact Persons Name & Phone #		
Site Physical Address		
Mailing Address (If Different)		

Additional Site Description Items

	YES	NO
Is a description of building materials utilized on site included (i.e. roofing & siding material, etc)?		
Is a description of the catch basins included ("Lynch" style, flow-through, drain, etc.)?		
Is a description of surface water conveyance included (vegetated ditch or swale, lined ditch, etc.)?		
Is a description of the outfall including pipe material, size and location in regards to the receiving water or drainage system discussed (i.e. free-fall to receiving water, submerged, etc.)?		
Is a description of any off-site run-on (if applicable) discussed in the SWPCP?		

Non-Stormwater Discharge Certification

	YES	NO
Has a Non-Stormwater Certification been included in the SWPCP?		

Stormwater Discharge Benchmarks and Sampling Procedures

	YES	NO
Are the constituents and associated benchmarks included in the plan?		
Are sampling procedures and reporting requirements discussed in the plan?		

SWPCP Review Procedures

	YES	NO
Are SWPCP review requirements discussed in the plan?		
Is the annual reporting requirements discussed in the plan?		

NOTES

For BES use only

Date Received: Reviewed by: Plan Accepted: Y / N

STORM WATER POLLUTION PREVENTION PLAN
FOR INDUSTRIAL ACTIVITY

Columbia Business Center
Vancouver, Washington

ANNUAL COMPLIANCE EVALUATION RECORD

DATE: _____ INSPECTOR'S NAME: _____

Check "Yes" if you determine that the SWPPP accurately describes the conditions and operations of the facility and if you determine that the controls have been implemented and are effective. Check "No" if you determine that the SWPPP does not accurately describe the facility or if you observe leaks, deterioration, or any other indication that the SWPPP is not effective. Describe corrective actions taken or proposed. Maintain the completed form in the SWPPP.

	Yes	No		Yes	No
Facility Information -			Preventative Maintenance -		
Pollution Prevention Team -			Erosion Control -		
Maps and Drawings -			Spill prevention & Cleanup -		
Drainage Areas -			Illicit Connections -		
Exposed Materials -			Non-Storm Discharges -		
Locomotive Refueling -			Daily Inspections -		
Accidental Releases -			Annual Complaince Inspections -		
			Evaluation Records -		
Good Housekeeping -					

Corrective Action:

Date of Illicit Discharge Evaluation	Outfall Observed	Method Used	Potential Sources of Pollutants

Results:

I, _____, certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date: Facility Manager's Signature:

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

Water Pollution Control Laboratory
6543 N. Burlington Ave., Portland, Oregon 97203-5452
(503) 823-5600

July 27, 2001

Mr. Jim Jakubiak
Schnitzer Steel Products Company
PO Box 10047
Portland, OR 97296

RE: NOTICE OF NON-COMPLIANCE; NPDES INDUSTRIAL STORMWATER PERMIT FAILURE TO CONDUCT STORMWATER MONITORING

Dear Mr. Jakubiak:

Schedule B of your NPDES Industrial Stormwater Permit requires permittees to collect and analyze samples for two storm events at each sample point per year.

As part of the City's Industrial Stormwater Program, facilities with industrial stormwater permits are required to submit their monitoring results to the City per City Code 17.39.050(a).

A review of your company's monitoring result submittal for the year July 1, 2000 through June 30, 2001 indicates that the required sampling did not occur. This is a violation of Schedule B (1)(a) of your stormwater permit. In addition to this notification, DEQ may seek independent enforcement action for this permit violation.

To avoid future violations of your permit, and escalating enforcement, please review Schedule B to ensure that you understand the monitoring requirements. If you have any questions regarding these requirements, please feel free to call me at (503) 823-7807.

Sincerely,

BRETT M. HULSTROM
Industrial Stormwater Program

BMH:bmh

Cc: Mr. Dennis Jurries, DEQ

S:\CUSTOMER\IU-S\Schnitzer Steel\SW-Monitoring\01-07-27-NON sampling requirements.doc

Schnitzer Steel Products Co.

Transmittal

To: Brett Hulstrom

From: Jim Jakubiak **Date:** 07/09/01

Re: Annual Storm Water Report, SSP International Terminals

CC:

☐ Urgent ☑ For Use ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Attached is a copy of the 2000-2001 Annual Storm Water Report for SSP's facility at 12005 North Burgard Road in Portland, Oregon. Please contact me at (503) 286-6976 if you have questions or comments.

Thank you,

Jim

SCHN00246334

Bureau of Environmental Services

Industrial Source Control Division

INDUSTRIAL STORMWATER

NPDES 1200-Z MONITORING REPORT

Industry Name: **SCHNITZER STEEL INTERNATIONAL**

Site Address: **12005 N BURGARD RD, PORTLAND, OR**

The permittee shall monitor stormwater **twice** per year for the parameters outlined in their NPDES 1200-Z Stormwater Discharge Permit Schedule B.1.a., and submit results to the City as stated in Schedule D.2.

Stormwater samples were taken for the above permittee, on these days and at these sample points:

Sample Date(s)	Sample Point(s)
October 20, 2000	Outfalls 2, 3, 4, 5, 6, 7, 16 and 20

The permittee shall submit by **July 15** of each year a copy of the **laboratory analysis reports**, which show analytical methods and detection limits, for stormwater samples collected for the previous monitoring year (July 1-June 30).

☐ **Monitoring Waiver Reduction Notification:**
Check the box if your facility is exercising a waiver of monitoring based on meeting benchmarks listed in Schedule A.9., AND site conditions have not changed to impact stormwater run-off. Note: This does not exclude your facility from notifying DEQ about the waiver of monitoring. Please read Schedule B of the permit to clearly understand the monitor waiver reduction guidelines. If waiver request is for select pollutants, list the parameters excluded from monitoring: _____.

☐ **No Exposure Certification:**
Check the box if your facility is required to have a NPDES 1200-Z permit. but monitoring is not required due to no exposure of stormwater to industrial activities. This no exposure certification is outlined in Schedule B.3.b, and the facility meets the requirements of Schedule B.1.e. Note: This does not exclude your facility from notifying DEQ.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: James L Schubel

Title: Environmental Administrator

Date: July 10, 2001

SCHN00246335

SCHNITZER STEEL PRODUCTS CO.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 286-5771 Telex 289875 FAX (503) 286-6948

July 9, 2001

Mr. Dennis Jurries
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201-4987

Re: Storm Water Monitoring Results for 2000-2001 Permit #1200-Z, File #108103

Dear Mr. Jurries:

The tabulated storm water analytical data for the Schnitzer Steel Product's Co.'s facility located at 12005 North Burgard Road in Portland is attached. We continue to implement previously identified Best Management Practices as outlined in our Stormwater Pollution Control Plan. In addition, we are installing additional stormwater treatment systems at outfalls 3, 4, 5, 6, and 7.

Unfortunately, due to the continued historical drought conditions in the region and due to elimination/minimization of storm water discharges during treatment system upgrades, we were only able to perform one storm water sampling round during the 2000/2001 reporting period. Permit conditions call for two sampling events. During the last reporting period Schnitzer Steel was able to collect and report analytical results from three sampling events.

On April 3, 2001, Brett Hulstrom of the City of Portland Environmental Services (Industrial Storm Water Section) conducted a Facility Storm Water Inspection. Mr. Hulstrom concluded Schnitzer Steel appears to be meeting conditions of the permit and the results of the inspection were satisfactory. A copy of the inspection can be forwarded to you upon request.

Mr. Hulstrom continues to help our neighbors at upgradient locations to improve the water quality of their discharges. Many of our industrial neighbors discharge storm water through our storm drainage systems and outfalls and we have historically been concerned with their discharges of total suspended sediment, oil and other constituents.

Please contact me at (503) 286-6976 if you have questions.

Sincerely,
Schnitzer Steel Products Co.

Jim Jakubiak
Environmental Administrator

Attachments

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
2	10/20/00	7.31	13	9.6	0.030	0.019	0.287
3	10/20/00	8.20	82	10	0.554	0.441	2.30
4	10/20/00	7.11	30	ND	0.296	0.02	0.088
5	10/20/00	8.39	206	ND	0.240	0.375	1.51
6	10/20/00	8.30	880	ND	2.60	0.230	0.688
7	10/20/00	7.75	8	ND	0.014	0.015	0.048
16	10/20/00	7.18	64	ND	0.09	0.094	0.342
20	10/20/00	6.95	16	ND	ND	0.003	0.024

Notes:

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH measurements reported for sampling dates 10/20/00 were reported by the laboratory and are considered estimates. pH data collected in the field using pH paper strips yielded comprable results.
ND - Not detected.
NA - Not analyzed.
Outfall 1 had no storm water discharge in 2000 or 2001.
No floating solids or oil and grease sheen were noted during monthly monitoring.

Columbia Analytical Services INC.
An Employee-Owned Company

November 14, 2000

Service Request No: K2008325

Jim Jakubiak
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97210

Re: SSP

Dear Jim:

Enclosed are the results of the sample(s) submitted to our laboratory on October 23, 2000. For your reference, these analyses have been assigned our service request number K2008325.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 3260.

Respectfully submitted,

Columbia Analytical Services, Inc.

Harvey Jacky
Project Chemist

HJ/gep

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 360/577-7222 • Fax 360/636-1068

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

Inorganic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.

Metals Data Qualifiers

#	The control limit criteria is not applicable. See case narrative.
B	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
E	The reported value is estimated because of the presence of matrix interference.
M	The duplicate injection precision was not met.
N	The Matrix Spike sample recovery is not within control limits. See case narrative.
S	The reported value was determined by the Method of Standard Additions (MSA).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
W	The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.
*	The duplicate analysis not within control limits. See case narrative.
+	The correlation coefficient for the MSA is less than 0.995.

Organic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
A	A tentatively identified compound, a suspected aldol-condensation product.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
C	The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
D	The reported result is from a dilution.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
N	The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
P	The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results (25% for CLP Pesticides).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a chromatographic interference.
X	See case narrative.

Additional Petroleum Hydrocarbon Specific Qualifiers

F	The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
L	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
H	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
O	The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
Y	The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
Z	The chromatographic fingerprint does not resemble a petroleum product.

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Steel Products Co.	**Service Request No.:**	K2008325
Project:	SSP	**Date Received:**	10/23/00
Sample Matrix:	Water		

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of Columbia Analytical Services, Inc. (CAS). This report contains analytical results for sample(s) designated for Tier I data deliverables. When appropriate to the method, method blank results have been reported with each analytical test.

All EPA recommended holding times have been met for analyses in this sample delivery group.

No difficulties were experienced during analysis of this batch.

Approved by HC **Date** 11/13/00

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2008325
Project:	SSP	**Date Collected:**	10/20/00
Sample Matrix:	Water	**Date Received:**	10/23/00
		Date Extracted:	NA
		Date Analyzed:	10/23/00

pH
EPA Method 150.1
Units: pH Units

Sample Name	Lab Code	Result
2	K2008325-001	7.31
3	K2008325-002	8.20
4	K2008325-003	7.11
5	K2008325-004	8.39
6	K2008325-005	8.30
7	K2008325-006	7.75
16	K2008325-007	7.18
20	K2008325-008	6.95

Approved By: _____ Date: 10/31/00

1A/102094
08325WET.PW1 - pH 10/31/00

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2008325
Project:	SSP	**Date Collected:**	10/20/00
Sample Matrix:	Water	**Date Received:**	10/23/00
		Date Extracted:	NA
		Date Analyzed:	10/26/00

Solids, Total Suspended (TSS)
EPA Method 160.2
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
2	K2008325-001	5	13
3	K2008325-002	5	82
4	K2008325-003	5	30
5	K2008325-004	5	206
6	K2008325-005	5	880
7	K2008325-006	5	8
16	K2008325-007	5	64
20	K2008325-008	5	16
Method Blank	K2008325-MB	5	ND

Approved By: _____ Date: 10/31/00

1AMRL/102594
08325WET.PW1 - TSS 10/31/00

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2008325
Project:	SSP	**Date Collected:**	10/20/00
Sample Matrix:	Water	**Date Received:**	10/23/00
		Date Extracted:	11/6/00

Total Metals
Units: µg/L (ppb)

	Analyte:	**Copper**	**Lead**	**Zinc**
	EPA Method:	6010B	7421	6010B
	Method Reporting Limit:	10	2	10
	Date Analyzed:	11/9/00	11/6/00	11/9/00
Sample Name	**Lab Code**			
2	K2008325-001	30	19	287
3	K2008325-002	554	441	2300
4	K2008325-003	296	20	88
5	K2008325-004	240	375	1510
6	K2008325-005	2600	230	688
7	K2008325-006	14	15	48
16	K2008325-007	90	94	342
20	K2008325-008	ND	3	24
Method Blank	K2008325-MB	ND	ND	ND

Approved By: Emm Date: 11/10/00

3AEPA/102694

08325ICP.BR1 - Sample 11/9/00

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2008325
Project:	SSP	**Date Collected:**	10/20/00
Sample Matrix:	Water	**Date Received:**	10/23/00
		Date Extracted:	11/2/00
		Date Analyzed:	11/3/00

Oil and Grease
EPA Method 1664
Units: mg/L (ppm)

		Oil & Grease, Total
	Analyte:	**(HEM)**
	Method Reporting Limit:	5.0
Sample Name	**Lab Code**	
2	K2008325-001	9.6
3	K2008325-002	10
4	K2008325-003	ND
5	K2008325-004	ND
6	K2008325-005	ND
7	K2008325-006	ND
16	K2008325-007	ND
20	K2008325-008	ND

Approved By: _____ Date: 11/6/00

2A/120594
08325PHC.SJ1 - SAMPLE 11/6/00

Columbia Analytical Services INC.
An Employee-Owned Company

CHAIN OF CUSTODY

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

SR#: R2008325

PAGE 1 OF 1 COC #

PROJECT NAME: SSP
PROJECT NUMBER: —
PROJECT MANAGER: Jim Jakobiak
COMPANY/ADDRESS: PO Box 10047, Portland, Oregon 97296-0047
PHONE #: (503) 286-6976 FAX #: (503) 286-6948
SAMPLER'S SIGNATURE: J. Jakobiak

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics by GC/MS 625☐ 8270☐	Volatile Organics 624☐ 8260☐	Hydrocarbons Gas☐ 8021☐ BTEX☐ Diesel☐ Oil☐ (*see below) ☐ Fuel Fingerprint (FIQ) ☐ NW-HCID Screen	Oil & Grease/TRPH 413.1☐ 418.1☐ 1664 SGT☐ 1664 HEM☐	PCB's Aroclors☐ Congeners☐	Pesticides/Herbicides 608☐ 8081A☐ 8141A☐ 8151A☐	Chlorophenolics - 8151M Tri☐ Tetra☐ PCP☐	PAHS 8310☐ SIM☐	GC/MS-SIM PAH☐ Phenol☐ Phthalates☐	Metals, Total or Dissolved (See list below)	Cyanide☐ Hex-Chrom☐	pH Cond. Cl, SO_4, PO_4, F, NO_2, NO_3, BOD, TSS, TDS (circle)	NH_3-N, COD, Total-P, TKN, TOC, DOC (circle)	TOC 9020☐ AOX 1650☐ 508☐	TPH - 413.1				REMARKS
2	10/20	0745	1	W	3										X		X			X					
3	10/20	0752	2		3										X		X			X					
4	10/20	0800	3		3										X		X			X					
5	10/20	0840	4		3										X		X			X					
6	10/20	0835	5		3										X		X			X					
7	10/20	0915	6		3										X		X			X					
16	10/20	0945	7		3										X		X			X					
20	10/20	1005	8	↓	3										X		X			X					

00009

REPORT REQUIREMENTS

- X I. Routine Report: Method Blank, Surrogate, as required
- ___ II. Report Dup., MS, MSD as required
- ___ III. Data Validation Report (includes all raw data)
- ___ IV. CLP Deliverable Report
- ___ V. EDD

INVOICE INFORMATION

P.O. #
Bill To: See above

TURNAROUND REQUIREMENTS

- ___ 24 hr. ___ 48 hr.
- ___ 5 Day
- X Standard (10-15 working days)
- ___ Provide FAX Results

Requested Report Date

Circle which metals are to be analyzed:

Total Metals: Al As Sb Ba Be B Ca Cd Co Cr (Cu) Fe (Pb) Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V (Zn) Hg

Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

*INDICATE STATE HYDROCARBON PROCEDURE: AK CA WI NORHTWEST OTHER: OR (CIRCLE ONE)

SPECIAL INSTRUCTIONS/COMMENTS:

RELINQUISHED BY:	RECEIVED BY:	RELINQUISHED BY:	RECEIVED BY:
Signature: J. Jakobiak Date/Time: 10/23/00 1000	Signature: Bowen Date/Time: 10/23/00 1000	Signature: Date/Time:	Signature: Date/Time:
Printed Name: Jim Jakobiak Firm: SSP	Printed Name: Bowen Firm: ATL	Printed Name: Firm:	Printed Name: Firm:

RCOC #1 12/99

SCHN00246346

Columbia Analytical Services, Inc. General Terms and Conditions

Laboratory Services

1. These Terms and Conditions embody the whole agreement of the parties in the absence of a signed and executed contract between the Laboratory ("LAB") and Client. They shall supersede all previous communications, representations, or agreements, either verbal or written, between the parties. The LAB specifically rejects all additional, inconsistent or conflicting terms, whether printed or otherwise set forth in any purchase order or other communication from the Client to LAB. The invalidity or unenforceability, in whole or in part of any provision, term or condition hereof shall not affect in any way the validity or enforceability of the remainder of the Terms and Conditions. No waiver by LAB of any provision, term or condition hereof or of any breach by or obligation of the Client hereunder shall constitute a waiver of such provision, term or condition on any other occasion or a waiver of any other breach by or obligation of the Client. This agreement shall be administered and interpreted under the laws of the state from which services are procured.

2. **Warranty.** Recognizing that the nature of many samples is unknown and that some may contain potentially hazardous components, LAB warrants only that it will perform testing services, obtain findings and prepare reports in accordance with generally accepted analytical laboratory principles and practices at the time of performance of services. LAB makes no other warranty, express or implied.

At LAB sole discretion, preliminary results may be given in advance of the laboratory report. Such preliminary results are tentative, subject to confirmation and final review by LAB. Client's use of preliminary results in any manner shall be at Client's sole risk.

3. **Scope and Compensation.** LAB agrees to perform the services described in the proposal or agreement to which these Terms and Conditions are attached. Unless the parties agree in writing to the contrary, the duties of LAB shall not be construed to exceed the services specifically described.

Payment terms are net 30 days from the date of invoice. All overdue payments are subject to an interest charge of one and one-half percent (1 1/2%) per month or a portion thereof. Client shall also be responsible for costs of collection, including payment of reasonable attorney fees if such expense is incurred. The prices, unless stated, do not include any sales, use or other taxes. Such taxes will be added to invoice prices when required. LAB reserves the right to require payment prior to release of data. Until such time as Client invoices are paid in full, LAB has no obligation, and will not defend, reproduce, return, or supplement data results.

4. **Prices.** Compensation for services performed will be based on the current Lab Analytical Fee Schedule, or on verbal quotations agreed to in writing by the parties. Unless specifically indicated on the written confirmation of quotation, analytical turnaround times are not guaranteed. The minimum charge will be $100.00 unless otherwise noted.

5. **Methods.** Where applicable, LAB will use analytical methodologies which are in substantial conformity with U.S. Environmental Protection Agency (EPA), State Agency, American Society for Testing and Materials (ASTM), Association of Official Analytical Chemists (AOAC), Standard Methods for the Examination of Water and Wastewater, or other recognized methodologies. LAB reserves the right to deviate from these methodologies, if necessary or appropriate, due to the nature or composition of the sample or otherwise, based on the reasonable judgment of LAB. Deviations, if any, will be made on a basis consistent with recognized standards of the industry and/or LAB's standard operating procedures.

6. **Limitations of Liability.** In the event of any error, omission or other professional negligence, the sole and exclusive responsibility of LAB shall be to reperform the deficient work at its own expense, and LAB shall have no other liability whatsoever. All claims shall be deemed waived unless made in writing and received by LAB within ninety (90) days following completion of services.

LAB shall have no liability, obligation or responsibility of any kind for losses, costs, expenses or other damages (including but not limited to any special, indirect, incidental or consequential damages) with respect to LAB's services or results.

All results provided by LAB are strictly for the use of its clients, and LAB is in no way responsible for the use of such results by clients or third parties. All results should be considered in their entirety, and LAB is not responsible for the separation, detachment, or other use of any portion of the results.

7. **Hazard Disclosure.** Client represents and warrants that any sample delivered to LAB will be preceded or accompanied by complete written disclosure of the presence of any hazardous substances known or suspected by Client. Client further warrants that any sample containing any hazardous substance which is to be delivered to LAB will be packaged, labeled, transported and delivered properly and in accordance with applicable laws.

8. **Sample Handling.** Prior to LAB's acceptance of any sample (or after any revocation of acceptance), the entire risk of loss of or damage to such sample remains with Client. Samples are accepted when receipt is acknowledged on chain of custody documentation. In no event will LAB have any responsibility or liability for the action or inaction of any carrier shipping or delivering any sample to or from L[illegible] premises.

LAB will use its best efforts to arrange for the shipment of specially prepared sample bottles, sampling instructions per Client instruction by the readily available, least cost method. Any other shipment arrangements will be at Client's expense.

Disposal of hazardous waste samples is the responsibility of the Client. If the Client does not wish such samples returned, LAB may add storage and disposal fees to the final invoice. Maximum storage time for samples is 30 days after completion of analysis, unless modified by applicable state or federal laws. Client will be required to give to LAB written instructions concerning disposal of these samples.

LAB reserves the absolute right, exercisable at any time, to refuse to receive delivery of, refuse to accept, or revoke acceptance of any sample which, in the sole judgment of LAB, (a) is of unsuitable volume, (b) may be or become unsuitable for, or may pose a risk in handling, transport or processing for any health, safety, environmental or other reason, whether or not due to the presence in the sample of any hazardous substance, and whether or not such presence has been disclosed to LAB by Client or (c) has been delivered to the LAB more than 72 hours after sampling or if one half or more of the recommended holding time for the analysis has lapsed.

9. **Legal Responsibility.** LAB is solely responsible for performance of this contract, and no affiliated company, director, officer, employee, or agent shall have any legal responsibility hereunder, whether in contract or tort, including negligence.

10. **Data Deliverables.** Where specifically requested by Client, LAB agrees to produce electronic data representing services performed hereunder, subject to the following specific understanding between the parties: LAB agrees to supply Client with electronic data as mutually defined, using an agreed medium. Client recognizes that LAB is not a software consultant, manufacturer or reseller; any transfer of electronic data pursuant to services provided by LAB is an accommodation to and strictly for the convenience of the client who is solely liable for the choice and maintenance of the medium utilized. Electronic data provided under this agreement is not deemed to be the project deliverable for the purpose of fulfilling obligations u[illegible] the Agreement. The provision of electronic data does not in any way modify [illegible] intention of the parties that the Client rely on the written or hard copy form of the deliverable.

Except with regard to any limited warranty as specifically set forth below, LAB disclaims and excludes all warranties express or implied with regard to the creation, transmittal or use of electronic data hereunder. The limited warranty in this Agreement replaces all other warranties, express or implied, including any warranties of merchantability or fitness for a particular purpose. Professional warranties extend to written or hard copy deliverables only and do not extend to electronic data supplied to Client. Professional warranties in the Agreement which extend to written or hard copy deliverables shall be undisturbed by this Amendment. LAB's liability for medium failure shall be limited to replacement of the electronic data with a hard copy for a period of thirty days from the date of delivery. LAB's electronic data transfer is derived in part from or is created using third party software, and no such third party warrants or assumes any liability regarding use of or undertakes to provide support information relating to LAB's electronic data. LAB will utilize anti-virus programs on a best efforts basis in preparation of the electronic data transfer, but LAB makes no warranty as to the effectiveness of such screening. LAB will also use its best efforts to ensure that its electronic data will meet all criteria as specified by Client, including criteria regarding date/time data, if, and when, included; but LAB makes no warranty as to the appropriateness of the client specified criteria by accepting the same.

In addition to indemnities contained in the underlying agreement between LAB and Client, Client shall hold LAB harmless from any claims, suits or liability arising from or related to electronic data supplied pursuant to this Agreement. Any reuse of original or altered files by Client shall be at Client's risk and without liability or responsibility to LAB, but shall entitle LAB to additional compensation for such unauthorized reuse. In no event will LAB's liability for electronic data include any special, incidental or consequential damages, whether or not LAB has knowledge of the potential for loss or damage.

11. **Force Majeure.** LAB shall have no responsibility or liability to the Client for any failure or delay in performance by LAB which results in whole or in part from cause or circumstance beyond the reasonable control of LAB. Such causes and circumstances shall include, but not be limited to, acts of God, acts of Client, acts or orders of any government authority, strikes or other labor disputes, natural disasters, accidents, wars, civil disturbances, difficulties or delays in transportation, mail or delivery services, inability to obtain sufficient services or supplies from LAB's usual suppliers, or any other cause beyond LAB's reasonable control.

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

Water Pollution Control Laboratory
6543 N. Burlington Ave., Portland, Oregon 97203-5452
(503) 823-5600

Date: June 19, 2001

To: SCHNITZER STEEL INTERNATIONAL
MATT CUSMA
PO BOX 10047
PORTLAND OR 97296

From: City of Portland Industrial Stormwater Program

Subject: Annual Stormwater Monitoring Data Submittal

Dear MATT CUSMA:

As the holder of an NPDES Stormwater Permit, you are required to conduct two (2) monitoring events per sample point between July 1 and June 30. Your permit requires copies of your monitoring data be submitted to the Oregon Department of Environmental Quality (DEQ) and the City of Portland. It is not necessary to submit copies of your monthly visual monitoring data.

Please complete the enclosed Monitoring Report Form (copy for future use) and submit it with your laboratory reports and chain of custody forms. **The data submittal deadline is July 15, 2001.**

Please submit your monitoring results to the following:

Mr. Dennis Jurries
Oregon Department of Environmental Quality
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987

Mr. Brett Hulstrom
City of Portland
Industrial Stormwater Program
6543 N Burlington Avenue
Portland, OR 97203-5452

If you have any questions regarding this matter, please contact the City of Portland Industrial Stormwater Program staff at 503.823.7807. Thank you.

Enclosure

Rain event - June 22
No sheen

SCHN00246348

CITY OF PORTLAND
ENVIRONMENTAL SERVICES

Water Pollution Control Laboratory
6543 N. Burlington Ave., Portland, Oregon 97203-5452
(503) 823-5600

April 5, 2001

Mr. Jim Jakubiak
Schnitzer Steel Industries, Inc.
PO Box 10047
Portland, OR 97296-0047

Subject: Annual Facility Storm Water Inspection

Dear Mr. Jakubiak:

On April 3, 2001, City of Portland staff conducted an inspection of your facility, located at 12005 N. Burgard, for compliance with conditions contained in its NPDES 1200-Z Storm Water Permit. Overall, the results of the inspection were satisfactory and Schnitzer Steel Industries appears to be meeting the conditions of their permit.

During the inspection, we discussed several items that your company plans on addressing.

1. Continued frequent maintenance of catch basins and catch basin filters.

2. Continued efforts to improve general site maintenance. (ie. site sweeping, asphalt and concrete repair, catch basin upgrades.)

3. Continue to investigate treatment options for your stormwater outfalls.

4. Eliminate blockage/collapse of storm sewer line discharging to outfall 01.

As a reminder, you still need to conduct your second stormwater monitoring event. Stormwater monitoring data need to be submitted to both the City and the Oregon Department of Environmental Quality (DEQ) by July 15, 2000.

Enclosed is a copy of the completed Stormwater Inspection Form generated as a result of my inspection.

Your assistance with the inspection is appreciated. If you have any questions regarding this matter, please contact me at (503) 823-7807. Thank you.

Sincerely,

BRETT M. HULSTROM
Industrial Storm Water Section

BMH:bmh

CITY OF PORTLAND
INDUSTRIAL FACILITY
STORMWATER INSPECTION REPORT
Short Form

Org. I.D. 200
Outfall Private
Receiving Stream Will River

Company Legal/Common Name Schnitzer Steel Industries

Facility/Mailing Address 12005 N. Burgard / PO Box 10047

Contact Person Matt Cusma / Jim Jakubiak Title Env. Admin. Phone 503 286 6944

Date of Inspection: 4/3/01 Time: 1:30 pm Previous Inspection: March 28, 2000

City Personnel: Brett Hulstrom Industry Personnel: Jim Jakubiak

Stormwater Permit Type: 1200-Z ✓ 1200-COLS ___ 1300-J ___ Other ___

Type of Business

(A) Type: Scrap Metal Recycling

2. Operating Schedule

(A) Number of employees: 85

Operating hours: 7 to 4:30

Days of Operation: S M T W T F S

Shifts 1 X 2 ___ 3 ___

3. Facility Maintenance Practices

(A) Are storm drain inlets periodically inspected, maintained, and/or cleaned? (Y)(N)

Describe the method and frequency of cleaning. 2-4 times per year / change filters as needed

(B) Are the parking areas periodically cleaned? (Y)(N) How often are parking areas cleaned? Sweeper - 2-3 times per week

Describe method for cleaning parking, repair and maintenance areas. Sweeper unit

(C) Is there wastewater and/or pretreatment on-site? (Y)(N)

If yes, describe: recycled systems are all treated - polymers, etc.

(D) Is there an oil/ water separator at the facility? (Y)(N) Connected to storm X or sanitary 0

How often is the oil/water separator inspected and/or cleaned? 14 - monthly - cleaned 2-4 times per year

SCHN00246350

er Usage: ~2500 Total Gallons per day

. water Disposition: Mark which box(s) applies.

Water Usage	Gallons/Day	Discharged to : Sanitary/ Septic	Storm	Dry Well/ Ground	No Discharge	Batch / Continuous/ Intermittent	Comments:
Employees	2500	X					
Boiler Blowdown							well water makeup
Non-contact Cooling					X		closed loop
Washing					X		closed loop
Irrigation							
Air Compressor							
Industrial Process					X		shredder closed loop
Cooling Tower Blowdown							
1							
2							
3							
Other							

6. Vehicle/Heavy Equipment Storage and Maintenance Issues

(A) Are trucks and/or heavy equipment parked on-site? (Y)(N)

If yes, how many lots ↑ 15

(B) Is there repair and maintenance on-site? (Y)(N)

Is the area covered/enclosed? (Y)(N)

(C) Does fueling occur on-site? (Y)(N)

Does the facility use a mobile fueling service? (Y)(N)

Vendor Name: In house

Are mechanisms in place for spill containment? (Y)(N)

Is the fueling area covered? (Y)(N)

Are there any drains in the fueling area? (Y)(N)

Where do the respective drains discharge? X storm ☐ sanitary ☐ dry well

Is there an oil / water separator in the fueling area collection system ? (Y)(N)

7. Air Discharges

(A) Are potential pollutants discharged into the air? (Y)(N)

Is the discharge a concern? (Address in notes) (Y)(N)

SCHN00246351

8. Wash Water Issues

(A) Are there areas where vehicles and/or heavy equipment are washed? (Y)(N)

(B) Does the facility use a mobile washer? (Y)(N)

Vendor name: _____

(D) Does the facility have a dedicated wash area/pad? (Y)(N)

(E) Where is the wash water disposed of? ☐ storm ☐ sanitary ☐ dry well ☒ recycle system

(F) Is the wash area/pad covered or enclosed? (Y)(N)

(G) Are there any drains in the wash area? (Y)(N)

Where do the drains discharge? ☐ storm ☐ sanitary ☐ dry well ☒ recycle system

(H) Is there an oil water separator in the washwater collection system? (Y)(N)

(I) Is the wash water recycled? (Y)(N)

(J) Is the wash area covered or enclosed? (Y)(N)

(K) Is there potential for storm water to run-onto or run-off from the wash area? (Y)(N)

(L) Are there any stains or other signs of pollutants on the floor or the wash area? (Y)(N)

9. Material Handling/Outdoor Manufacturing/Outdoor Storage/Waste Storage Issues

Describe materials being handled, outdoor manufacturing, and outdoor storage areas. Indicate potential pollutants and the risk for stormwater to come in contact with them. Include Best Management Practices (BMPs) used to prevent storm water from contacting handled materials and discharging to storm drains.

Scrap metal products - cars, steel, etc.

have outdoor shredder and cutter - both recycled systems

Storage of scrap metal is a concern - some sw from these areas goes to storm

traditional BMPs do not really apply to this facility due to size and nature of operations - have sweeping, inserts, treatment

10. Potential Pollutant Issues

List pollutant categories that may be discharged to the storm sewer (i.e. volatiles, solvents, acids, caustics).

various metals, total suspended solids, oil and grease, fuel leaks

11. Stormwater Pollution Control Plan (SWPCP)

(A) Has a Preventative Maintenance Program been implemented? (Y)(N)

(B) Has an Employee Awareness Program been implemented? (Y)(N)

(C) Have Record Keeping and Internal Reporting Procedures been implemented? (Y)(N)

(D) Has an Annual Review of the SWPCP been conducted? (Y)(N)

(E) Has the facility experienced a significant spill within the last 12 months? (Y)(N)

If yes, was the spill documented and describe extent of stormwater impacts: _____

12. Monitoring

(A) Is monitoring (both for the proper parameters and the proper frequency) being done as noted in Schedule B of the NPDES permit? (Y)(N)

(B) Are required visual observations being made and documented? (Y)(N)

13. Conclusions

Items for Follow-up / Comments / Recommendations
Include any recommended storm water monitoring and explain rationale

have stormwater training video - training employees
going to install pretreatment on outfall 3, 4, 5, 6, 7 (sand filters and vortechnics)
may do dock outfalls in next year or so
wants to upgrade catch basins
shavings area contained - water goes to shredder unit make up
prepared metal storage goes to ground - no off-site discharge
west of Bldg. B
truck wash looks good
lots of dust on-site - frequent sweeping
considering operations - site looks good
fully implementing program

Inspected by: Brad Hutter Date: April 3, 2001

CITY OF PORTLAND
ENVIRONMENTAL SERVICES
Water Pollution Control Laboratory
6543 N. Burlington Ave., Portland, Oregon 97203-5452
(503) 823-5600

April 5, 2001

Mr. Jim Jakubiak
Schnitzer Steel Industries, Inc.
PO Box 10047
Portland, OR 97296-0047

Subject: Annual Facility Storm Water Inspection

Dear Mr. Jakubiak:

On April 3, 2001, City of Portland staff conducted an inspection of your facility, located at 12005 N. Burgard, for compliance with conditions contained in its NPDES 1200-Z Storm Water Permit. Overall, the results of the inspection were satisfactory and Schnitzer Steel Industries appears to be meeting the conditions of their permit.

During the inspection, we discussed several items that your company plans on addressing.

1. Continued frequent maintenance of catch basins and catch basin filters.

2. Continued efforts to improve general site maintenance. (ie. site sweeping, asphalt and concrete repair, catch basin upgrades.)

3. Continue to investigate treatment options for your stormwater outfalls.

4. Eliminate blockage/collapse of storm sewer line discharging to outfall 01.

As a reminder, you still need to conduct your second stormwater monitoring event. Stormwater monitoring data need to be submitted to both the City and the Oregon Department of Environmental Quality (DEQ) by July 15, 2000.

Enclosed is a copy of the completed Stormwater Inspection Form generated as a result of my inspection.

Your assistance with the inspection is appreciated. If you have any questions regarding this matter, please contact me at (503) 823-7807. Thank you.

Sincerely,

BRETT M. HULSTROM
Industrial Storm Water Section

BMH:bmh

CITY OF PORTLAND
INDUSTRIAL FACILITY
STORMWATER INSPECTION REPORT
Short Form

Org. I.D. 200
Outfall Private
Receiving Stream Will River

Company Legal/Common Name Schnitzer Steel Industries

Facility/Mailing Address 12005 N. Burgard / PO Box 10047

Contact Person Matt Cusma / Jim Jakubiak Title Env. Admin. Phone 503 286 6944

Date of Inspection: 4/3/01 Time: 1:30 pm Previous Inspection: March 28, 2000

City Personnel: Brett Hulstrom Industry Personnel: Jim Jakubiak

Stormwater Permit Type: 1200-Z ✓ 1200-COLS ___ 1300-J ___ Other ___

1. Type of Business
   (A) Type: Scrap Metal Recycling

2. Operating Schedule
   (A) Number of employees: 85 Days of Operation: S M T W T F S
   Operating hours: 7 to 430 Shifts 1 X 2 ___ 3 ___

3. Facility Maintenance Practices
   (A) Are storm drain inlets periodically inspected, maintained, and/or cleaned? (Y)(N)
   Describe the method and frequency of cleaning. 2-4 times per year / change filters as needed
   (B) Are the parking areas periodically cleaned? (Y)(N) How often are parking areas cleaned? Sweeper - 2-3 times per week
   Describe method for cleaning parking, repair and maintenance areas. Sweeper unit
   (C) Is there wastewater and/or pretreatment on-site? (Y)(N)
   If yes, describe: recycled systems are all treated - polymers, etc.
   (D) Is there an oil/ water separator at the facility? (Y)(N) Connected to storm X or sanitary ☐
   How often is the oil/water separator inspected and/or cleaned? 14 - monthly - cleaned 2-4 times per year

SCHN00246355

er Usage: ~2000 Total Gallons per day

Water Disposition: Mark which box(s) applies.

Water Usage	Gallons/Day	Discharged to : Sanitary/ Septic	Storm	Dry Well/ Ground	No Discharge	Batch / Continuous/ Intermittent	Comments:
Employees	2500	X					well water makeup
Boiler Blowdown							
Non-contact Cooling					X		closed loop
Washing					X		closed loop
Irrigation							
Air Compressor							
Industrial Process					X		shredder closed loop
Cooling Tower Blowdown							
1							
2							
3							
Other							

6. Vehicle/Heavy Equipment Storage and Maintenance Issues

(A) Are trucks and/or heavy equipment parked on-site? (Y)(N)

If yes, how many lots ↑ 15

(B) Is there repair and maintenance on-site? (Y)(N)

Is the area covered/enclosed? (Y)(N)

(C) Does fueling occur on-site? (Y)(N)

Does the facility use a mobile fueling service? (Y)(N)

Vendor Name: In house

Are mechanisms in place for spill containment? (Y)(N)

Is the fueling area covered? (Y)(N)

Are there any drains in the fueling area? (Y)(N)

Where do the respective drains discharge? X storm ☐ sanitary ☐ dry well

Is there an oil / water separator in the fueling area collection system ? (Y)(N)

7. Air Discharges

(A) Are potential pollutants discharged into the air? (Y)(N)

Is the discharge a concern? (Address in notes) (Y)(N)

8. Wash Water Issues

(A) Are there areas where vehicles and/or heavy equipment are washed? (Y)(N)

(B) Does the facility use a mobile washer? (Y)(N)

Vendor name: _____

(D) Does the facility have a dedicated wash area/pad? (Y)(N)

(E) Where is the wash water disposed of? ☐ storm ☐ sanitary ☐ dry well ☒ recycle system

(F) Is the wash area/pad covered or enclosed? (Y)(N)

(G) Are there any drains in the wash area? (Y)(N)

Where do the drains discharge? ☐ storm ☐ sanitary ☐ dry well ☒ recycle system

(H) Is there an oil water separator in the washwater collection system? (Y)(N)

(I) Is the wash water recycled? (Y)(N)

(J) Is the wash area covered or enclosed? (Y)(N)

(K) Is there potential for storm water to run-onto or run-off from the wash area? (Y)(N)

(L) Are there any stains or other signs of pollutants on the floor or the wash area? (Y)(N)

9. Material Handling/Outdoor Manufacturing/Outdoor Storage/Waste Storage Issues

Describe materials being handled, outdoor manufacturing, and outdoor storage areas. Indicate potential pollutants and the risk for stormwater to come in contact with them. Include Best Management Practices (BMPs) used to prevent storm water from contacting handled materials and discharging to storm drains.

Scrap metal products - cars, steel, etc.

have outdoor shredder and cutter - both recycled systems

Storage of scrap metal is a concern - some sw from that area goes to storm

traditional BMPs do not really apply to this facility due to size and nature of operations - have sweeping, inserts, treatment

10. Potential Pollutant Issues

List pollutant categories that may be discharged to the storm sewer (i.e. volatiles, solvents, acids, caustics).

various metals, total suspended solids, oil and grease, fuel leaks

SCHN00246357

11. Stormwater Pollution Control Plan (SWPCP)

(A) Has a Preventative Maintenance Program been implemented? (Y)(N)

(B) Has an Employee Awareness Program been implemented? (Y)(N)

(C) Have Record Keeping and Internal Reporting Procedures been implemented? (Y)(N)

(D) Has an Annual Review of the SWPCP been conducted? (Y)(N)

(E) Has the facility experienced a significant spill within the last 12 months? (Y)(N)

If yes, was the spill documented and describe extent of stormwater impacts: _____

12. Monitoring

(A) Is monitoring (both for the proper parameters and the proper frequency) being done as noted in Schedule B of the NPDES permit? (Y)(N)

(B) Are required visual observations being made and documented? (Y)(N)

13. Conclusions

Items for Follow-up / Comments / Recommendations

Include any recommended storm water monitoring and explain rationale

have stormwater training video - training employees
going to install pretreatment on outfall 3, 4, 5, 6, 7 (sand filtes and vortechnics)
may do dock outfalls in next year or so
wants to upgrade catch basins
shavings area contained - water goes to shredder unit make up
Prepared metal storage goes to ground - no off-site discharge
Truck wash looks good
lots of dust on-site - frequent sweeping
considering operations - site looks good
fully implementing program

Inspected by: Brett Hutter Date: April 3, 2001

SCHN00246358

Bureau of Environmental Services

Industrial Source Control Division

INDUSTRIAL STORMWATER

NPDES 1200-Z MONITORING REPORT

Industry Name: **SCHNITZER STEEL INTERNATIONAL**

Site Address: **12005 N BURGARD RD, PORTLAND, OR**

The permittee shall monitor stormwater **twice** per year for the parameters outlined in their NPDES 1200-Z Stormwater Discharge Permit Schedule B.1.a., and submit results to the City as stated in Schedule D.2.

Stormwater samples were taken for the above permittee, on these days and at these sample points:

Sample Date(s)	Sample Point(s)
October 20, 2000	Outfalls 2, 3, 4, 5, 6, 7, 16 and 20

The permittee shall submit by **July 15** of each year a copy of the **laboratory analysis reports**, which show analytical methods and detection limits, for stormwater samples collected for the previous monitoring year (July 1-June 30).

☐ **Monitoring Waiver Reduction Notification:**
Check the box if your facility is exercising a waiver of monitoring based on meeting benchmarks listed in Schedule A.9., AND site conditions have not changed to impact stormwater run-off. Note: This does not exclude your facility from notifying DEQ about the waiver of monitoring. Please read Schedule B of the permit to clearly understand the monitor waiver reduction guidelines. If waiver request is for select pollutants, list the parameters excluded from monitoring: _____.

☐ **No Exposure Certification:**
Check the box if your facility is required to have a NPDES 1200-Z permit. but monitoring is not required due to no exposure of stormwater to industrial activities. This no exposure certification is outlined in Schedule B.3.b, and the facility meets the requirements of Schedule B.1.e. Note: This does not exclude your facility from notifying DEQ.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: James L. Schubel

Title: Environmental Administrator

Date: July 10, 2001

Schnitzer Steel Products Co.

Transmittal

To: Brett Hulstrom

From: Jim Jakubiak **Date:** 07/12/00

Re: Annual Storm Water Report, SSP International Terminals

CC:

☐ Urgent ☑ For Use ☐ Please Comment ☐ Please Reply ☐ Please Recycl

Attached is a copy of the 1999-2000 Annual Storm Water Report for SSP's facility at 12005 North Burgard Road in Portland, Oregon. Please contact me at (503) 286-6976 if you have questions or comments.

Thank you,

Jim

SCHN00246361

SCHNITZER STEEL PRODUCTS CO.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 286-5771 Telex 289875 FAX (503) 286-6948

File

July 12, 2000

Mr. Dennis Jurries
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201-4987

Re: Storm Water Monitoring Results for 1999-2000 Permit #1200-Z, File #108103

Dear Mr. Jurries:

The tabulated storm water analytical data for the Schnitzer Steel Product's Co.'s facility located at 12005 North Burgard Road in Portland is attached. We continue to implement previously identified Best Management Practices as outlined in our Stormwater Pollution Control Plan submitted to you in October of 1999. In addition, we continue to review available water quality treatment literature to evaluate potential improvements of existing Best Management Practices.

We have recently installed an additional storm water treatment unit (i.e., sand filter) at outfall 2 and are considering other storm water treatment technologies at other locations needing enhanced treatment to meet benchmark limits.

We continue to actively engage our neighbors at upgradient locations to improve ~~their~~ of their water quality discharges. Many of our industrial neighbors discharge storm water through our storm drainage systems and outfalls. By continuing to encourage our neighbors to use better management practices, we hope to continue to reduce or eliminate their contribution of total suspended sediment, oil and grease, and other constituents to the storm drain outfalls.

Please contact me at (503) 286-6976 if you have questions.

Sincerely,
Schnitzer Steel Products Co.

Jim Jakubiak

Jim Jakubiak
Environmental Administrator

Attachments: Table 1
Laboratory Reports

Industrial Source Control Division

INDUSTRIAL STORMWATER

NPDES 1200-Z MONITORING REPORT

Industry Name: Schnitzer Steel

Site Address: 12005 North Burgard Road

The permittee shall monitor stormwater twice per year for the parameters outlined in their NPDES 1200-Z Stormwater Discharge Permit Schedule B.1.a., and submit results to the City as stated in Schedule D.2.

Stormwater samples were taken for the above permittee, on these days and at these sample points:

Sample Date(s)	Sample Point(s)
11/11/99	See attached report
3/4/00	See attached report
6/11/00	See attached report

The permittee shall submit by **July 15** of each year a copy of the **laboratory analysis reports**, which show analytical methods and detection limits, for stormwater samples collected for the previous monitoring year (July 1-June 30).

☐ **Monitoring Waiver Reduction Notification:**
Check the box if your facility is exercising a waiver of monitoring based on meeting benchmarks listed in Schedule A.9., AND site conditions have not changed to impact stormwater run-off. Note: This does not exclude your facility from notifying DEQ about the waiver of monitoring. Please read Schedule B of the permit to clearly understand the monitor waiver reduction guidelines. If waiver request is for select pollutants, list the parameters excluded from monitoring: _____.

☐ **No Exposure Certification:**
Check the box if your facility is required to have a NPDES 1200-Z permit, but monitoring is not required due to no exposure of stormwater to industrial activities. This no exposure certification is outlined in Schedule B.3.b, and the facility meets the requirements of Schedule B.1.e. Note: This does not exclude your facility from notifying DEQ.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: J. Johnson

Title: Environmental Administrator

Date: July 12, 2000

SCHN00246363

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
2	11/11/99	7.61	200	16	0.663	1.23	7.87
	3/4/00	7.79	160	7	0.323	0.396	2.91
	6/11/00	7.64	54	12	0.229	0.301	1.82
3	11/11/99	7.42	88	9	0.383	0.560	3.42
	3/4/00	7.58	77	ND	0.216	0.240	1.8
	6/11/00	7.65	15	8.2	0.144	0.109	0.485
4	11/11/99	8.46	287	9	2.0	0.138	0.634
	3/4/00	10.35	36	ND	0.138	0.039	0.218
	6/11/00	7.75	11	ND	0.101	0.008	0.039
5	11/11/99	7.20	113	11	0.232	0.240	1.57
	3/4/00	7.91	112	6	0.214	0.228	1.38
	6/11/00	7.60	11	ND	0.031	0.032	0.197
6	11/11/99	9.14	272	14	1.12	0.083	0.274
	3/4/00	9.80	26	ND	0.079	0.012	0.031
	6/11/00	7.98	13	ND	0.018	0.003	ND
7	11/11/99	9.45	35	ND	ND	0.006	0.017
	3/4/00	8.52	49	ND	0.029	0.036	0.085
	6/11/00	8.16	ND	ND	0.014	0.011	0.038
14	11/11/99	8.25	13	12	0.052	0.034	0.547
	3/4/00	7.28	99	ND	0.170	0.158	0.937
	6/11/00	NA	NA	NA	NA	NA	NA
16	3/10/00	7.09	40	64	0.191	0.177	0.429
20	11/11/99	9.45	20	ND	ND	0.006	0.017
	3/4/00	9.40	14	ND	ND	0.006	0.018
	6/11/00	8.45	8	ND	ND	0.006	0.017
Notes:		5.5-9	130	10	0.1	0.4	0.6

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH measurements reported for sampling dates 11/11/99, 3/4/00 and 3/10/00 were by the laboratory and considered estimates. Data reported for 6/11/00 were collected using field instruments.
ND - Not detected.
NA - Not analyzed.
Outfall 1 had no storm water discharge in 1999 or 2000.
No floating solids or oil and grease sheen were noted during monthly monitoring.

Columbia Analytical Services INC.
An Employee-Owned Company

March 27, 2000

Service Request No: K2001667

Jim Jakubiak
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97296-0047

Re: SSP-IT

Dear Jim:

Enclosed are the results of the sample(s) submitted to our laboratory on March 9, 2000. For your reference, these analyses have been assigned our service request number K2001667.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 3260.

Respectfully submitted,

Columbia Analytical Services, Inc.

Harvey Jacky
Project Chemist

HJ/ll

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SCHN00246365

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Steel Products Co.	**Service Request No.:**	K2001667
Project:	SSP-IT	**Date Received:**	3/9/00
Sample Matrix:	Water		

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of Columbia Analytical Services, Inc. (CAS). This report contains analytical results for sample(s) designated for Tier I data deliverables. When appropriate to the method, method blank results have been reported with each analytical test.

All EPA recommended holding times have been met for analyses in this sample delivery group.

The following difficulties were experienced during analysis of this batch:

All samples were received past the recommended holding time for pH, EPA Method 150.1. The samples were analyzed as soon as possible after receipt by the laboratory.

Approved by _____ **Date** 3/22/00

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2001667
Project:	SSP-IT	**Date Collected:**	3/4/00
Sample Matrix:	Water	**Date Received:**	3/9/00
		Date Extracted:	NA

Inorganic Parameters
Units: mg/L (ppm)

Analyte:	**pH (units)**	**Solids, Total Suspended (TSS)**
EPA Method:	150.1	160.2
Method Reporting Limit:	-	5
Date Analyzed:	3/9/00	3/10/00

Sample Name	**Lab Code**		
#2	K2001667-001	7.79 (H)	160
#3	K2001667-002	7.58 (H)	77
#4	K2001667-003	10.35 (H)	36
#5	K2001667-004	7.91 (H)	112
#6	K2001667-005	9.80 (H)	26
#7	K2001667-006	8.52 (H)	49
#18 (#4 blind duplicate)	K2001667-007	10.36 (H)	38
#20	K2001667-008	9.40 (H)	14
Method Blank	K2001667-MB	-	ND

H The Sample was received past the recommended hold time.

Approved By: MMR Date: 3/13/00

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT
Sample Matrix: Water

Service Request: K2001667
Date Collected: 3/4/00
Date Received: 3/9/00
Date Extracted: 3/13/00

Total Metals
Units: µg/L (ppb)

	Analyte:	Copper	Lead	Zinc
	EPA Method:	6010B	7421	6010B
	Method Reporting Limit:	10	2	10
	Date Analyzed:	3/13/00	3/15/00	3/13/00
Sample Name	**Lab Code**			
#2	K2001667-001	323	396	2910
#3	K2001667-002	216	240	1800
#4	K2001667-003	138	39	218
#5	K2001667-004	214	228	1380
#6	K2001667-005	79	12	31
#7	K2001667-006	29	36	85
#18 (#4 blind duplicate)	K2001667-007	138	41	219
#20	K2001667-008	ND	6	18
Method Blank	K2001667-MB	ND	ND	ND

Approved By: Emt Date: 3/16/00

3AEPA/102694
01667ICP.BR1 - Sample 3/16/00

SCHN00246369

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT
Sample Matrix: Water

Service Request: K2001667
Date Collected: 3/4/00
Date Received: 3/9/00
Date Extracted: 3/23/00
Date Analyzed: 3/23/00

Oil and Grease
EPA Method 413.1
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
#2	K2001667-001	5	7
#3	K2001667-002	5	ND
#4	K2001667-003	5	ND
#5	K2001667-004	5	6
#6	K2001667-005	5	ND
#7	K2001667-006	5	ND
#18 (#4 blind duplicate)	K2001667-007	5	ND
#20	K2001667-008	5	ND
Method Blank	K000323-WB	5	ND

Approved By: M Eden Date: 3/24/00

1AMRL/102594
01667PHC.KH1 - 413w 3/23/00

SCHN00246370

Columbia Analytical Services INC.
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CHAIN OF CUSTODY

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SR#: 1C2001667

PAGE 1 OF 1 COC #: 2000

PROJECT NAME: SSP-IT
PROJECT NUMBER:
PROJECT MANAGER: Jim Jakubiak
COMPANY/ADDRESS: P.O. Box 10047, Portland, OR 97296-0047
PHONE #: (503) 286-6976 FAX #: (503) 286-6948
SAMPLER'S SIGNATURE:

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics by GC/MS 625☐ 8270☐	Volatile Organics 624☐ 8260☐	Pesticide / Herbicides 608☐ 8081☐	Total Toxic Organics (TTO) 608☐ 624☐ 625☐	PCB AROCLORs 8082	NWTPH-HCID☐ NWTPH-D☐	NWTPH-G☐	Hydrocarbon Scan☐ O & G☐	Chlorophenolics: 8151M Tri☐ Tetra☐ PCP☐	PAHs 8310☐ SIM☐	GCMS-SIM PAH☐	Phenol☐ Phthalates☐ Metals, Total or Dissolved (See list below)	Cyanide☐ Hex-Chrom☐	pH, Cond, Cl, SO_4, PO_4, F, NO_2, NO_3, BOD, (TSS) TDS (circle)	NH_3-N, COD, Total-P, TKN, TOC, DOC (circle)	TOC 9020☐ AOX 1650☐ 506☐					REMARKS
#2	3-9-00	1610	1667-1	Water	3							X					X		X							
#3	↓	1615	2	↓	3							X					X		X							
#4		1630	3		3							X					X		X							
#5		1645	4		3							X					X		X							
#6		1655	5		3							X					X		X							
#7		1710	6		3							X					X		X							
#18		1830	7		3							X					X		X							#4 Blind Duplicate
#20	↓	1725	8	↓	3							X					X		X							

REPORT REQUIREMENTS

- X I. Routine Report: Method Blank, Surrogate, as required
- ___ II. Report Dup., MS, MSD as required
- ___ III. Data Validation Report (includes all raw data)
- ___ IV. CLP Deliverable Report
- ___ V. EDD

INVOICE INFORMATION

P.O. #
Bill To: Jim Jakubiak (address above)

TURNAROUND REQUIREMENTS

- ___ 24 hr. ___ 48 hr.
- ___ 5 Day
- X Standard (10-15 working days)
- ___ Provide FAX Results

Requested Report Date

Circle which metals are to be analyzed:

Total Metals: Al As Sb Ba Be B Ca Cd Co Cr (Cu) Fe (Pb) Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V (Zn) Hg

Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

SPECIAL INSTRUCTIONS/COMMENTS:

Total Copper EPA 6010B
Total Pb EPA 7421
Total Zinc EPA 6010B
pH 150.1 EPA
TSS EPA 160.2
O&G EPA 413.1

RELINQUISHED BY:	RECEIVED BY:	RELINQUISHED BY:	RECEIVED BY:
Signature: J. Jakubiak; Date/Time: 3-9-00 / 9:30AM	Signature: Debi Wood; Date/Time: 3/9/00 0940	Signature:	Signature:
Print Name: J. Jakubiak; Firm: BSI	Printed Name: Debi Wood; Firm: CAS	Printed Name:	Printed Name:

SCHN00246371

Columbia Analytical Services INC.
An Employee-Owned Company

December 1, 1999

Service Request No: K9908184

Jim Jakubiak
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97296-0047

Re: SSP-IT

Dear Jim:

Enclosed are the results of the sample(s) submitted to our laboratory on November 12, 1999. For your reference, these analyses have been assigned our service request number K9908184.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 260.

Respectfully submitted,

Columbia Analytical Services, Inc.

Harvey Jacky
Project Chemist

HJ/ee

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Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Steel Products Co.	**Service Request No.:**	K9908184
Project:	SSP-IT	**Date Received:**	11/12/99
Sample Matrix:	Water		

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of Columbia Analytical Services, Inc. (CAS). This report contains analytical results for sample(s) designated for Tier I data deliverables. When appropriate to the method, method blank results have been reported with each analytical test.

The following difficulties were experienced during analysis of this batch:

Samples #2, #3, #4, #5, #6, #7, #14, #20 were received past the recommended holding time for pH, EPA 150.1. The samples were analyzed as soon as possible after receipt by the laboratory.

Approved by _____ **Date** 12/1/99

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9908184
Project:	SSP-IT	**Date Collected:**	11/11/99
Sample Matrix:	Water	**Date Received:**	11/12/99
		Date Extracted:	NA

Inorganic Parameters
Units: mg/L (ppm)

Analyte:	**pH (units)**	**Solids, Total Suspended (TSS)**
EPA Method:	150.1	160.2
Method Reporting Limit:	-	5
Date Analyzed:	11/13/99	11/18/99

Sample Name	**Lab Code**		
#2	K9908184-001	7.61 (H)	200
#3	K9908184-002	7.42 (H)	88
#4	K9908184-003	8.46 (H)	287
#5	K9908184-004	7.20 (H)	113
#6	K9908184-005	9.14 (H)	272
#7	K9908184-006	9.45 (H)	35
#14	K9908184-007	8.25 (H)	13
#20	K9908184-008	9.45 (H)	20
Method Blank	K9908184-MB	-	ND

H The Sample was received past the recommended hold time.

Approved By: _____ Date: 11-30-99

3ADW/061694
08184WET.LJ1 - 3_Tests 11/30/99

SCHN00246375

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9908184
Project:	SSP-IT	**Date Collected:**	11/11/99
Sample Matrix:	Water	**Date Received:**	11/12/99
		Date Extracted:	11/17/99

Total Metals
Units: µg/L (ppb)

	Analyte:	**Copper**	**Lead**	**Zinc**
	EPA Method:	6010B	7421	6010B
	Method Reporting Limit:	10	2	10
	Date Analyzed:	11/18/99	11/19/99	11/18/99
Sample Name	**Lab Code**			
#2	K9908184-001	663	1230	7870
#3	K9908184-002	383	560	3420
#4	K9908184-003	2000	138	634
#5	K9908184-004	232	240	1570
#6	K9908184-005	1120	83	274
#7	K9908184-006	ND	6	17
#14	K9908184-007	52	34	547
#20	K9908184-008	ND	6	17
Method Blank	K9908184-MB	ND	ND	ND

Approved By: _____ Date: 11/27/99

3AEPA/102694

08184ICP.BR1 - Sample 11/26/99

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT
Sample Matrix: Water

Service Request: K9908184
Date Collected: 11/11/99
Date Received: 11/12/99
Date Extracted: 11/30/99
Date Analyzed: 11/30/99

Oil and Grease
EPA Method 413.1
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
#2	K9908184-001	5	16
#3	K9908184-002	5	9
#4	K9908184-003	5	9
#5	K9908184-004	5	11
#6	K9908184-005	5	14
#7	K9908184-006	5	ND
#14	K9908184-007	5	12
#20	K9908184-008	5	ND
Method Blank	K991130-WB	5	ND

Approved By: M Eckler Date: 11/30/99

1AMRL/102594
08184PHC.KH1 - 413w 11/30/99

Columbia Analytical Services INC.
An Employee-Owned Company

CHAIN OF CUSTODY

SR#: K9908184

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PAGE 1 OF 1 COC #

PROJECT NAME: SSP - IT
PROJECT NUMBER:
PROJECT MANAGER: Jim Jakubiak
COMPANY/ADDRESS: P.O. Box 10047
Portland OR. 97296-0047
PHONE #: (503) 286-6976 FAX #: (503) 286-6948
SAMPLER'S SIGNATURE:

00067

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics by GC/MS 625☐ 8270☐	Volatile Organics 624☐ 8260☐	Pesticide / Herbicides 608☐ 8081☐	Total Toxic Organics (TTO) 608☐ 624☐ 625☐	PCB AROCLORs 8082	NWTPH-HCID☐ NWTPH-D☐	NWTPH-G☐	Hydrocarbon Scan☐ O & G	Chlorophenolics - 8151M Tri☐ Tetra☐ PCP☐	PAHs 8310☐	GC/MS-SIM PAH☐ SIM☐	Phenol☐ Phthalates☐ Metals, Total or Dissolved (See list below)	Cyanide☐	Hex-Chrom☐ pH, Cond, Cl, SO_4, PO_4, F, NO_2, NO_3, BOD, (TSS) TDS (circle)	NH_3-N, COD, Total-P, TKN, TOC, DOC (circle)	TOC 9020☐	AOX 1650☐ 506☐					REMARKS
#2	11/11/99	1510	1	Water	3							X					X		X								
#3	11/11/99	1500	2	Water	3							X					X		X								
#4	11/11/99	1450	3	Water	3							X					X		X								
#5	11/11/99	1520	4	Water	3							X					X		X								
#6	11/11/99	1515	5	Water	3							X					X		X								
#7	11/11/99	1545	6	Water	3							X					X		X								
#14	11/11/99	1615	7	Water	3							X					X		X								
#20	11/11/99	1600	8	Water	3							X					X		X								

REPORT REQUIREMENTS

X I. Routine Report: Method Blank, Surrogate, as required
___ II. Report Dup., MS, MSD as required
___ III. Data Validation Report (includes all raw data)
___ IV. CLP Deliverable Report
___ V. EDD

INVOICE INFORMATION
P.O. # SSP-IT
Bill To: Jim Jakubiak
P.O. Box 10047
Portland, OR. 97296

TURNAROUND REQUIREMENTS
___ 24 hr. ___ 48 hr.
___ 5 Day
X Standard (10-15 working days)
___ Provide FAX Results

Requested Report Date

Circle which metals are to be analyzed:

Total Metals: Al As Sb Ba Be B Ca Cd Co Cr (Cu) Fe (Pb) Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V (Zn) Hg

Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

SPECIAL INSTRUCTIONS/COMMENTS:
Total Copper EPA 6010B
Total Lead EPA 7421
Total Zinc EPA 6010B
pH EPA 150.1
TSS EPA 160.2
O&G EPA 413.1

RELINQUISHED BY:	RECEIVED BY:	RELINQUISHED BY:	RECEIVED BY:
Signature: J. Jakubiak — Date/Time: 11/12/99 11:15am	Signature: Nelli Wood — Date/Time: 11/13/99 0800	Signature — Date/Time	Signature — Date/Time
Printed Name: Jim Jakubiak — Firm: SSI	Printed Name: Nelli Wood — Firm: CAS Col	Printed Name — Firm	Printed Name — Firm

SCHN00246378

Columbia Analytical Services, Inc. General Terms and Conditions

Laboratory Services

1. These Terms and Conditions embody the whole agreement of the parties in the absence of a signed and executed contract between the Laboratory ("LAB") and Client. They shall supersede all previous communications, representations, or agreements, either verbal or written, between the parties. The LAB specifically rejects all additional, inconsistent or conflicting terms, whether printed or otherwise set forth in any purchase order or other communication from the Client to LAB. The invalidity or unenforceability, in whole or in part of any provision, term or condition hereof shall not affect in any way the validity or enforceability of the remainder of the Terms and Conditions. No waiver by LAB of any provision, term or condition hereof or of any breach by or obligation of the Client hereunder shall constitute a waiver of such provision, term or condition on any other occasion or a waiver of any other breach by or obligation of the Client. This agreement shall be administered and interpreted under the laws of the state from which services are procured.

2. **Warranty.** Recognizing that the nature of many samples is unknown and that some may contain potentially hazardous components, LAB warrants only that it will perform testing services, obtain findings and prepare reports in accordance with generally accepted analytical laboratory principles and practices at the time of performance of services. LAB makes no other warranty, express or implied.

At LAB sole discretion, preliminary results may be given in advance of the laboratory report. Such preliminary results are tentative, subject to confirmation and final review by LAB. Client's use of preliminary results in any manner shall be at Client's sole risk.

3. **Scope and Compensation.** LAB agrees to perform the services described in the proposal or agreement to which these Terms and Conditions are attached. Unless the parties agree in writing to the contrary, the duties of LAB shall not be construed to exceed the services specifically described.

Payment terms are net 30 days from the date of invoice. All overdue payments are subject to an interest charge of one and one-half percent (1 1/2%) per month or a portion thereof. Client shall also be responsible for costs of collection, including payment of reasonable attorney fees if such expense is incurred. The prices, unless stated, do not include any sales, use or other taxes. Such taxes will be added to invoice prices when required. LAB reserves the right to require payment prior to release of data. Until such time as Client invoices are paid in full, LAB has no obligation, and will not defend, reproduce, return, or supplement data results.

4. **Prices.** Compensation for services performed will be based on the current Lab Analytical Fee Schedule, or on verbal quotations agreed to in writing by the parties. Unless specifically indicated on the written confirmation of quotation, analytical turnaround times are not guaranteed. The minimum charge will be $100.00 unless otherwise noted.

5. **Methods.** Where applicable, LAB will use analytical methodologies which are in substantial conformity with U.S. Environmental Protection Agency (EPA), State Agency, American Society for Testing and Materials (ASTM), Association of Official Analytical Chemists (AOAC), Standard Methods for the Examination of Water and Wastewater, or other recognized methodologies. LAB reserves the right to deviate from these methodologies, if necessary or appropriate, due to the nature or composition of the sample or otherwise, based on the reasonable judgment of LAB. Deviations, if any, will be made on a basis consistent with recognized standards of the industry and/or LAB's standard operating procedures.

6. **Limitations of Liability.** In the event of any error, omission or other professional negligence, the sole and exclusive responsibility of LAB shall be to reperform the deficient work at its own expense, and LAB shall have no other liability whatsoever. All claims shall be deemed waived unless made in writing and received by LAB within ninety (90) days following completion of services.

LAB shall have no liability, obligation or responsibility of any kind for losses, costs, expenses or other damages (including but not limited to any special, indirect, incidental or consequential damages) with respect to LAB's services or results.

All results provided by LAB are strictly for the use of its clients, and LAB is in no way responsible for the use of such results by clients or third parties. All results should be considered in their entirety, and LAB is not responsible for the separation, detachment, or other use of any portion of the results.

7. **Hazard Disclosure.** Client represents and warrants that any sample delivered to LAB will be preceded or accompanied by complete written disclosure of the presence of any hazardous substances known or suspected by Client. Client further warrants that any sample containing any hazardous substance which is to be delivered to LAB will be packaged, labeled, transported and delivered properly and in accordance with applicable laws.

8. **Sample Handling.** Prior to LAB's acceptance of any sample (or after any revocation of acceptance), the entire risk of loss of or damage to such sample remains with Client. Samples are accepted when receipt is acknowledged on chain of custody documentation. In no event will LAB have any responsibility or liability for the act or inaction of any carrier shipping or delivering any sample to or from LAB premises.

LAB will use its best efforts to arrange for the shipment of specially prepared sample bottles, sampling instructions per Client instruction by the readily available, least cost method. Any other shipment arrangements will be at Client's expense.

Disposal of hazardous waste samples is the responsibility of the Client. If the Client does not wish such samples returned, LAB may add storage and disposal fees to the final invoice. Maximum storage time for samples is 30 days after completion of analysis, unless modified by applicable state or federal laws. Client will be required to give to LAB written instructions concerning disposal of these samples.

LAB reserves the absolute right, exercisable at any time, to refuse to receive delivery of, refuse to accept, or revoke acceptance of any sample which, in the sole judgment of LAB, (a) is of unsuitable volume, (b) may be or become unsuitable for, or may pose a risk in handling, transport or processing for any health, safety, environmental or other reason, whether or not due to the presence in the sample of any hazardous substance, and whether or not such presence has been disclosed to LAB by Client or (c) has been delivered to the LAB more than 72 hours after sampling or if one half or more of the recommended holding time for the analysis has lapsed.

9. **Legal Responsibility.** LAB is solely responsible for performance of this contract, and no affiliated company, director, officer, employee, or agent shall have any legal responsibility hereunder, whether in contract or tort, including negligence.

10. **Data Deliverables.** Where specifically requested by Client, LAB agrees to produce electronic data representing services performed hereunder, subject to the following specific understanding between the parties: LAB agrees to supply Client with electronic data as mutually defined, using an agreed medium. Client recognizes that LAB is not a software consultant, manufacturer or reseller; any transfer of electronic data pursuant to services provided by LAB is an accommodation to and strictly for the convenience of the client who is solely liable for the choice and maintenance of the medium utilized. Electronic data provided under this agreement is not deemed to be the project deliverable for the purpose of fulfilling obligations under the Agreement. The provision of electronic data does not in any way modify the intention of the parties that the Client rely on the written or hard copy form of the deliverable.

Except with regard to any limited warranty as specifically set forth below, LAB disclaims and excludes all warranties express or implied with regard to the creation, transmittal or use of electronic data hereunder. The limited warranty in this Agreement replaces all other warranties, express or implied, including any warranties of merchantability or fitness for a particular purpose. Professional warranties extend to written or hard copy deliverables only and do <u>not</u> extend to electronic data supplied to Client. Professional warranties in the Agreement which extend to written or hard copy deliverables shall be undisturbed by this Amendment. LAB's liability for medium failure shall be limited to replacement of the electronic data with a hard copy for a period of thirty days from the date of delivery. LAB's electronic data transfer is derived in part from or is created using third party software, and no such third party warrants or assumes any liability regarding use of or undertakes to provide support information relating to LAB's electronic data. LAB will utilize anti-virus programs on a best efforts basis in preparation of the electronic data transfer, but LAB makes no warranty as to the effectiveness of such screening. LAB will also use its best efforts to ensure that its electronic data will meet all criteria as specified by Client, including criteria regarding date/time data, if, and when, included; but LAB makes no warranty as to the appropriateness of the client specified criteria by accepting the same.

In addition to indemnities contained in the underlying agreement between LAB and Client, Client shall hold LAB harmless from any claims, suits or liability arising from or related to electronic data supplied pursuant to this Agreement. Any reuse of original or altered files by Client shall be at Client's risk and without liability or responsibility to LAB, but shall entitle LAB to additional compensation for such unauthorized reuse. In no event will LAB's liability for electronic data include any special, incidental or consequential damages, whether or not LAB has knowledge of the potential for loss or damage.

11. **Force Majeure.** LAB shall have no responsibility or liability to the Client for a failure or delay in performance by LAB which results in whole or in part from a cause or circumstance beyond the reasonable control of LAB. Such causes and circumstances shall include, but not be limited to, acts of God, acts of Client, acts or orders of any government authority, strikes or other labor disputes, natural disasters, accidents, wars, civil disturbances, difficulties or delays in transportation, mail or delivery services, inability to obtain sufficient services or supplies from LAB's usual suppliers, or any other cause beyond LAB's reasonable control.

Columbia Analytical Services INC.
An Employee-Owned Company

March 28, 2000

Service Request No: K2001797

Jim Jakubiak
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97296-0047

Re: SSP-IT

Dear Jim:

Enclosed are the results of the sample(s) submitted to our laboratory on March 13, 2000. For your reference, these analyses have been assigned our service request number K2001797.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 3260.

Respectfully submitted,

Columbia Analytical Services, Inc.

Harvey Jacky
Project Chemist

HJ/aw

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 360/ 577-7222 • Fax 360/636-1068

SCHN00246380

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Steel Products Co.	**Service Request No.:**	K2001797
Project:	SSP-IT	**Date Received:**	3/13/00
Sample Matrix:	Water		

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of Columbia Analytical Services, Inc. (CAS). This report contains analytical results for sample(s) designated for Tier I data deliverables. When appropriate to the method, method blank results have been reported with each analytical test.

All EPA recommended holding times have been met for analyses in this sample delivery group.

No difficulties were experienced during analysis of this batch.

Approved by _____ **Date** 3/30/00

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2001797
Project:	SSP-IT	**Date Collected:**	3/10/00
Sample Matrix:	Water	**Date Received:**	3/13/00
		Date Extracted:	NA

Inorganic Parameters
Units: mg/L (ppm)

Analyte:	**pH (units)**	**Solids, Total Suspended (TSS)**
EPA Method:	150.1	160.2
Method Reporting Limit:	-	5
Date Analyzed:	3/13/00	3/16/00

Sample Name	**Lab Code**		
#14	K2001797-001	7.28	99
#16	K2001797-002	7.09	40
Method Blank	K2001797-MB	-	ND

Approved By: [illegible] Date: 3/20/00

01797WET.LJ1 - 3_Tests 3/20/00

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2001797
Project:	SSP-IT	**Date Collected:**	3/10/00
Sample Matrix:	Water	**Date Received:**	3/13/00
		Date Extracted:	3/15/00

Total Metals
Units: µg/L (ppb)

	Analyte:	**Copper**	**Lead**	**Zinc**
	EPA Method:	6010B	7421	6010B
	Method Reporting Limit:	10	2	10
	Date Analyzed:	3/15/00	3/16/00	3/15/00
Sample Name	**Lab Code**			
#14	K2001797-001	170	158	937
#16	K2001797-002	191	177	429
Method Blank	K2001797-MB	ND	ND	ND

Approved By: JC Date: 3/20/00

3AEPA/102694

01797ICP.BR1 - Sample 3/17/00

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP-IT
Sample Matrix: Water

Service Request: K2001797
Date Collected: 3/10/00
Date Received: 3/13/00
Date Extracted: 3/27/00
Date Analyzed: 3/27/00

Oil and Grease
EPA Method 413.1
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
#14	K2001797-001	5	ND
#16	K2001797-002	5	64
Method Blank	K000327-WB	5	ND

Approved By: M Eller Date: 3/27/00

1AMRL/102594
01797FHC.KH1 - 413w 3/27/00

SCHN00246385

Columbia Analytical Services INC.
An Employee-Owned Company

CHAIN OF CUSTODY

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

SR#: K2001797

PAGE 1 OF 1 COC # 00007

PROJECT NAME: SSP-IT
PROJECT NUMBER:
PROJECT MANAGER: Jim Jakubiak
COMPANY/ADDRESS: P.O. Box 10047, Portland, OR 97296-0047
PHONE #: (503) 286-6976
FAX #: (503) 286-6948
SAMPLER'S SIGNATURE: [signature]

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics by GC/MS 625☐ 8270☐	Volatile Organics 624☐ 8260☐ 8021☐ BTEX☐	Pesticide / Herbicides 608☐ 8081☐ 8141☐ 8151☐	Total Toxic Organics (TTO) 608☐ 624☐ 625☐	PCB AROCLORs 8082	NWTPH - HCID☐ NWTPH-D☐ NWTPH-G☐	Hydrocarbon Scan☐ O & G☒	Chlorophenolics - 8151M Tri☐ Tetra☐ PCP☐	PAHs 8310☐ SIM☐	GC/MS-SIM PAH☐ Phenol☐ Phthalates☐	Metals, Total or Dissolved (See list below)	Cyanide☐ Hex-Chrom☐	pH, Cond., Cl, SO4, PO4, F, NO2, NO3, BOD, (TSS), TDS (circle)	NH3-N, COD, Total-P, TKN, TOC, DOC (circle)	TOC 9020☐ AOX 1650☐ 506☐					REMARKS
#14	3-10-00	1		Water	3							X				X		X							
#16	3-10-00	2		Water	3							X				X		X							

REPORT REQUIREMENTS

- X I. Routine Report: Method Blank, Surrogate, as required
- ___ II. Report Dup., MS, MSD as required
- ___ III. Data Validation Report (includes all raw data)
- ___ IV. CLP Deliverable Report
- ___ V. EDD

INVOICE INFORMATION

P.O. #
Bill To: Jim Jakubiak (Address Above)

TURNAROUND REQUIREMENTS

___ 24 hr. ___ 48 hr.
___ 5 Day
X Standard (10-15 working days)
___ Provide FAX Results

Requested Report Date

Circle which metals are to be analyzed:

Total Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

SPECIAL INSTRUCTIONS/COMMENTS:

Total Copper TSS
Total Lead O&G
Total Zinc

RELINQUISHED BY:	RECEIVED BY:	RELINQUISHED BY:	RECEIVED BY:
Signature: [signature] Date/Time:	Signature: [signature] Date/Time: 3/13/00 10:43	Signature: Date/Time:	Signature: [signature] Date/Time: 3/13 @ 2:30pm
Printed Name: Jim Jakubiak Firm: SST	Printed Name: Joy Montalbo Firm: CAS	Printed Name: Firm:	Printed Name: Bowen Firm: AS

SCHN00246386

Columbia Analytical Services, Inc. General Terms and Conditions

Laboratory Services

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All results provided by LAB are strictly for the use of its clients, and LAB is in no way responsible for the use of such results by clients or third parties. All results should be considered in their entirety, and LAB is not responsible for the separation, detachment, or other use of any portion of the results.

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LAB will use its best efforts to arrange for the shipment of specially prepared sample bottles, sampling instructions per Client instruction by the readily available, least cost method. Any other shipment arrangements will be at Client's expense.

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Except with regard to any limited warranty as specifically set forth below, LAB disclaims and excludes all warranties express or implied with regard to the creation, transmittal or use of electronic data hereunder. The limited warranty in this Agreement replaces all other warranties, express or implied, including any warranties of merchantability or fitness for a particular purpose. Professional warranties extend to written or hard copy deliverables only and do <u>not</u> extend to electronic data supplied to Client. Professional warranties in the Agreement which extend to written or hard copy deliverables shall be undisturbed by this Amendment. LAB's liability for medium failure shall be limited to replacement of the electronic data with a hard copy for a period of thirty days from the date of delivery. LAB's electronic data transfer is derived in part from or is created using third party software, and no such third party warrants or assumes any liability regarding use of or undertakes to provide support information relating to LAB's electronic data. LAB will utilize anti-virus programs on a best efforts basis in preparation of the electronic data transfer, but LAB makes no warranty as to the effectiveness of such screening. LAB will also use its best efforts to ensure that its electronic data will meet all criteria as specified by Client, including criteria regarding date/time data, if, and when, included; but LAB makes no warranty as to the appropriateness of the client specified criteria by accepting the same.

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Columbia Analytical Services INC.
An Employee-Owned Company

July 11, 2000

Service Request No: K2004733

Jim Jakubiak
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97296-0047

Re: SSP

Dear Jim:

Enclosed are the results of the sample(s) submitted to our laboratory on June 24, 2000. For your reference, these analyses have been assigned our service request number K2004733.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 3260.

Respectfully submitted,

Columbia Analytical Services, Inc.

Harvey Jacky
Project Chemist

HJ/ee

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 360/ 577-7222 • Fax 360/636-1068

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

Inorganic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.

Metals Data Qualifiers

#	The control limit criteria is not applicable. See case narrative.
B	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
E	The reported value is estimated because of the presence of matrix interference.
M	The duplicate injection precision was not met.
N	The Matrix Spike sample recovery is not within control limits.
S	The reported value was determined by the Method of Standard Additions (MSA).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
W	The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
i	The MRL/MDL has been elevated due to a matrix interference.
X	See case narrative.
*	The duplicate analysis not within control limits.
+	The correlation coefficient for the MSA is less than 0.995.

Organic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
A	A tentatively identified compound, a suspected aldol-condensation product.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result.
C	The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
D	The reported result is from a dilution.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated concentration that is less than the MRL but greater than or equal to the MDL.
N	The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
P	The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results (25% for CLP Pesticides).
U	The compound was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
i	The MRL/MDL has been elevated due to a matrix interference.
Y	The chromatogram resembles a petroleum product but does not match the calibration standard.
Z	The chromatogram does not resemble a petroleum product.
X	See case narrative.

COLUMBIA ANALYTICAL SERVICES, INC.

Client:	Schnitzer Steel Products Co.	**Service Request No.:**	K2004733
Project:	SSP	**Date Received:**	6/24/00
Sample Matrix:	Water		

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of Columbia Analytical Services, Inc. (CAS). This report contains analytical results for sample(s) designated for Tier I data deliverables. When appropriate to the method, method blank results have been reported with each analytical test.

All EPA recommended holding times have been met for analyses in this sample delivery group.

No difficulties were experienced during analysis of this batch.

Approved by _____ **Date** 7/11/00

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2004733
Project:	SSP	**Date Collected:**	6/11/00
Sample Matrix:	Water	**Date Received:**	6/24/00
		Date Extracted:	NA
		Date Analyzed:	6/26/00

Solids, Total Suspended (TSS)
EPA Method 160.2
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
#2	K2004733-001	5	54
#3	K2004733-002	5	15
#4	K2004733-003	5	11
#5	K2004733-004	5	11
#6	K2004733-005	5	13
#7	K2004733-006	5	ND
#20	K2004733-007	5	8
Method Blank	K2004733-MB	5	ND

Approved By: _____ Date: 7/6/00

1AMRL/102594
04733WET.LJ1 - TSS 7/6/00

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K2004733
Project:	SSP	**Date Collected:**	6/11/00
Sample Matrix:	Water	**Date Received:**	6/24/00
		Date Extracted:	6/29/00

Total Metals
Units: µg/L (ppb)

	Analyte:	**Copper**	**Lead**	**Zinc**
	EPA Method:	6010B	7421	6010B
	Method Reporting Limit:	10	2	10
	Date Analyzed:	7/10/00	6/29/00	7/10/00
Sample Name	**Lab Code**			
#2	K2004733-001	229	301	1820
#3	K2004733-002	144	109	485
#4	K2004733-003	101	8	39
#5	K2004733-004	31	32	197
#6	K2004733-005	18	3	ND
#7	K2004733-006	14	11	38
#20	K2004733-007	ND	6	17
Method Blank	K2004733-MB	ND	ND	ND

Approved By: _____ Date: 7/10/00

3AEPA/102694

04733ICP.EA1 - Sample 7/10/00

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Schnitzer Steel Products Co.
Project: SSP
Sample Matrix: Water

Service Request: K2004733
Date Collected: 6/11/00
Date Received: 6/24/00
Date Extracted: 7/7/00
Date Analyzed: 7/7/00

Oil and Grease
EPA Method 413.1
Units: mg/L (ppm)

Sample Name	Lab Code	MRL	Result
#2	K2004733-001	5	12
#3	K2004733-002	5	8.2
#4	K2004733-003	5	ND
#5	K2004733-004	5	ND
#6	K2004733-005	5	ND
#7	K2004733-006	5	ND
#20	K2004733-007	5	ND
Method Blank	K000707-WB	5	ND

Approved By: M Euler Date: 7/10/00

1AMRL/102594
04733PHC.KH1 - 413w 7/10/00

Columbia Analytical Services INC.
An Employee-Owned Company

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

DATE 6/23/00 PAGE 1 OF 1

PROJECT NAME SSP #
PROJECT MANAGER Jim Jakubiak
COMPANY/ADDRESS P.O. Box 10047
Portland, Oregon 9796-0047
PHONE
SAMPLERS SIGNATURE Jim Jakubiak

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Total Metals (Pb, Zn, Cu)	Oil & Grease	TSS														REMARKS
#2	6/11	1740	1	W	3	X	X	X														
#3		1750	2	W	3	X	X	X														
#4		1800	3	W	3	X	X	X														
#5		1840	4	W	3	X	X	X														
#6		1855	5	W	3	X	X	X														
#7		1905	6	W	3	X	X	X														
#20		1930	7	W	3	X	X	X														

00008

RELINQUISHED BY:	RECEIVED BY:
Signature: Jim Jakubiak	Signature: Lori K. Hawn
Printed Name: Jim Jakubiak	Printed Name: LHS
Firm: SSI	Firm:
Date/Time: 6/23/00 1430	Date/Time: 6/24/00 08W

TURNAROUND REQUIREMENTS
___ 24 hr ___ 48 hr. ___ 5 day
X Standard (10-15 working days)
___ Provide Verbal Preliminary Results
X Provide FAX preliminary Results
Requested Report Date ___

REPORT REQUIREMENTS
X I. Routine Report
___ II. Report (includes DUP.MS. MSD, as required, may be charged as samples)
___ III. Data Validation Report (includes All Raw Data)
___ IV. CLP Deliverable Report

INVOICE INFORMATION:
P.O.# ___
Bill To Same as above

SAMPLE RECEIPT:
Shipping VIA: ___
Shipping #: ___
Condition: ___
Lab No: K2004733

RELINQUISHED BY:	RECEIVED BY:
Signature	Signature
Printed Name	Printed Name
Firm	Firm
Date/Time	Date/Time

SPECIAL INSTRUCTIONS/COMMENTS:
Standard Turnaround

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

SCHN00246395

Columbia Analytical Services INC
An Employee-Owned Company

CHAIN OF CUSTODY

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) 636-1068

SR#: _____

PAGE 1 OF 1 COC # _____

PROJECT NAME: SSP
PROJECT NUMBER: —
PROJECT MANAGER: Jim Jakubiak
COMPANY/ADDRESS: PO Box 10047
Portland, Oregon 97296-0047
PHONE #: (503) 226-6976 FAX #: (503) 226-6948
SAMPLER'S SIGNATURE: J. Jakubiak

SAMPLE I.D.	DATE	TIME	LAB I.D.	MATRIX	NUMBER OF CONTAINERS	Semivolatile Organics by GC/MS 625☐ 8270☐	Volatile Organics 624☐ 8260☐ 8021☐ BTEX☐	Hydrocarbons (*see below) Gas☐ Diesel☐ Oil☐ ☐ Fuel Fingerprint (FIQ) ☐ NW-HCID Screen	Oil & Grease/TRPH 413.1☐ 418.1☐ 1664 SGT☐ 1664 HEM☐	PCB's Aroclors☐ Congeners☐	Pesticides/Herbicides 608☐ 8081A☐ 8141A☐ 8151A☐	Chlorophenolics - 8151M Tri☐ Tetra☐ PCP☐	PAHS 8310☐ SIM☐	GC/MS-SIM PAH☐ Phenol☐ Phthalates☐	Metals: Total or Dissolved (See filter below)	Cyanide☐ Hex-Chrom☐	pH, Cond, Cl, SO_4, PO_4, F, NO_2, NO_3, BOD, TSS, TDS (circle)	NH_3-N, COD, Total-P, TKN, TOC, DOC (circle)	TOC 9020☐ AOX 1650☐ 506☐	TPH - HID			REMARKS
2	10/20	0745		(W)	3											X		X			X	Lt Greenish yellow	Field pH 7.1
3	10/20	0752			3											X		X			X	Very Lt Brown Tint	7.8
4	10/20	0900			3											X		X			X	Slight brown tint	7.11
5	10/20	0840			3											X		X			X	Med brown tint	8.0
6	10/20	0935			3											X		X			X	Clear Brown	8.2
7	10/20	0915			3											X		X			X	Slight Brown	8.4
16	10/20	0915			3											X		X			X	Clear	7.8
20	10/20	1005		↓	3											X		X			X	Clear	7.8

REPORT REQUIREMENTS

- X I. Routine Report: Method Blank, Surrogate, as required
- ___ II. Report Dup., MS, MSD as required
- ___ III. Data Validation Report (Includes all raw data)
- ___ IV. CLP Deliverable Report
- ___ V. EDD

INVOICE INFORMATION

P.O. # _____
Bill To: See above

TURNAROUND REQUIREMENTS

- ___ 24 hr. ___ 48 hr.
- ___ 5 Day
- X Standard (10-15 working days)
- ___ Provide FAX Results

Requested Report Date _____

Circle which metals are to be analyzed:

Total Metals: Al As Sb Ba Be B Ca Cd Co Cr (Cu) Fe (Pb) Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V (Zn) Hg

Dissolved Metals: Al As Sb Ba Be B Ca Cd Co Cr Cu Fe Pb Mg Mn Mo Ni K Ag Na Se Sr Tl Sn V Zn Hg

*INDICATE STATE HYDROCARBON PROCEDURE: AK CA WI NORHTWEST OTHER: OR (CIRCLE ONE)

SPECIAL INSTRUCTIONS/COMMENTS:

All puddles throughout bulk storage area ranged 8.0-8.6 with random sampling of 20+ puddles.
Storm Water off pg iron 8.4 silty
D.I. Water 9.1 (Background Test)

RELINQUISHED BY:	RECEIVED BY:	RELINQUISHED BY:	RECEIVED BY:
Signature: J. Jakubiak — Date/Time: 10/23/00 1100	Signature — Date/Time	Signature — Date/Time	Signature — Date/Time
Printed Name: Jim Jakubiak — Firm: SSP	Printed Name — Firm	Printed Name — Firm	Printed Name — Firm

SCHN00246396

Columbia Analytical Services, Inc. General Terms and Conditions

Laboratory Services

1. These Terms and Conditions embody the whole agreement of the parties in the absence of a signed and executed contract between the Laboratory ("LAB") and Client. They shall supersede all previous communications, representations, or agreements, either verbal or written, between the parties. The LAB specifically rejects all additional, inconsistent or conflicting terms, whether printed or otherwise set forth in any purchase order or other communication from the Client to LAB. The invalidity or unenforceability, in whole or in part of any provision, term or condition hereof shall not affect in any way the validity or enforceability of the remainder of the Terms and Conditions. No waiver by LAB of any provision, term or condition hereof or of any breach by or obligation of the Client hereunder shall constitute a waiver of such provision, term or condition on any other occasion or a waiver of any other breach by or obligation of the Client. This agreement shall be administered and interpreted under the laws of the state from which services are procured.

2. **Warranty.** Recognizing that the nature of many samples is unknown and that some may contain potentially hazardous components, LAB warrants only that it will perform testing services, obtain findings and prepare reports in accordance with generally accepted analytical laboratory principles and practices at the time of performance of services. LAB makes no other warranty, express or implied.

At LAB sole discretion, preliminary results may be given in advance of the laboratory report. Such preliminary results are tentative, subject to confirmation and final review by LAB. Client's use of preliminary results in any manner shall be at Client's sole risk.

3. **Scope and Compensation.** LAB agrees to perform the services described in the proposal or agreement to which these Terms and Conditions are attached. Unless the parties agree in writing to the contrary, the duties of LAB shall not be construed to exceed the services specifically described.

Payment terms are net 30 days from the date of invoice. All overdue payments are subject to an interest charge of one and one-half percent (1 1/2%) per month or a portion thereof. Client shall also be responsible for costs of collection, including payment of reasonable attorney fees if such expense is incurred. The prices, unless stated, do not include any sales, use or other taxes. Such taxes will be added to invoice prices when required. LAB reserves the right to require payment prior to release of data. Until such time as Client invoices are paid in full, LAB has no obligation, and will not defend, reproduce, return, or supplement data results.

4. **Prices.** Compensation for services performed will be based on the current Lab Analytical Fee Schedule, or on verbal quotations agreed to in writing by the parties. Unless specifically indicated on the written confirmation of quotation, analytical turnaround times are not guaranteed. The minimum charge will be $100.00 unless otherwise noted.

5. **Methods.** Where applicable, LAB will use analytical methodologies which are in substantial conformity with U.S. Environmental Protection Agency (EPA), State Agency, American Society for Testing and Materials (ASTM), Association of Official Analytical Chemists (AOAC), Standard Methods for the Examination of Water and Wastewater, or other recognized methodologies. LAB reserves the right to deviate from these methodologies, if necessary or appropriate, due to the nature or composition of the sample or otherwise, based on the reasonable judgment of LAB. Deviations, if any, will be made on a basis consistent with recognized standards of the industry and/or LAB's standard operating procedures.

6. **Limitations of Liability.** In the event of any error, omission or other professional negligence, the sole and exclusive responsibility of LAB shall be to reperform the deficient work at its own expense, and LAB shall have no other liability whatsoever. All claims shall be deemed waived unless made in writing and received by LAB within ninety (90) days following completion of services.

LAB shall have no liability, obligation or responsibility of any kind for losses, costs, expenses or other damages (including but not limited to any special, indirect, incidental or consequential damages) with respect to LAB's services or results.

All results provided by LAB are strictly for the use of its clients, and LAB is in no way responsible for the use of such results by clients or third parties. All results should be considered in their entirety, and LAB is not responsible for the separation, detachment, or other use of any portion of the results.

7. **Hazard Disclosure.** Client represents and warrants that any sample delivered to LAB will be preceded or accompanied by complete written disclosure of the presence of any hazardous substances known or suspected by Client. Client further warrants that any sample containing any hazardous substance which is to be delivered to LAB will be packaged, labeled, transported and delivered properly and in accordance with applicable laws.

8. **Sample Handling.** Prior to LAB's acceptance of any sample (or after any revocation of acceptance), the entire risk of loss of or damage to such sample remains with Client. Samples are accepted when receipt is acknowledged on chain of custody documentation. In no event will LAB have any responsibility or liability for the action or inaction of any carrier shipping or delivering any sample to or from LAB's premises.

LAB will use its best efforts to arrange for the shipment of specially prepared sample bottles, sampling instructions per Client instruction by the readily available, least cost method. Any other shipment arrangements will be at Client's expense.

Disposal of hazardous waste samples is the responsibility of the Client. If the Client does not wish such samples returned, LAB may add storage and disposal fees to the final invoice. Maximum storage time for samples is 30 days after completion of analysis, unless modified by applicable state or federal laws. Client will be required to give to LAB written instructions concerning disposal of these samples.

LAB reserves the absolute right, exercisable at any time, to refuse to receive delivery of, refuse to accept, or revoke acceptance of any sample which, in the sole judgment of LAB, (a) is of unsuitable volume, (b) may be or become unsuitable for, or may pose a risk in handling, transport or processing for any health, safety, environmental or other reason, whether or not due to the presence in the sample of any hazardous substance, and whether or not such presence has been disclosed to LAB by Client or (c) has been delivered to the LAB more than 72 hours after sampling or if one half or more of the recommended holding time for the analysis has lapsed.

9. **Legal Responsibility.** LAB is solely responsible for performance of this contract, and no affiliated company, director, officer, employee, or agent shall have any legal responsibility hereunder, whether in contract or tort, including negligence.

10. **Data Deliverables.** Where specifically requested by Client, LAB agrees to produce electronic data representing services performed hereunder, subject to the following specific understanding between the parties: LAB agrees to supply Client with electronic data as mutually defined, using an agreed medium. Client recognizes that LAB is not a software consultant, manufacturer or reseller; any transfer of electronic data pursuant to services provided by LAB is an accommodation to and strictly for the convenience of the client who is solely liable for the choice and maintenance of the medium utilized. Electronic data provided under this agreement is not deemed to be the project deliverable for the purpose of fulfilling obligations under the Agreement. The provision of electronic data does not in any way modify the intention of the parties that the Client rely on the written or hard copy form of the deliverable.

Except with regard to any limited warranty as specifically set forth below, LAB disclaims and excludes all warranties express or implied with regard to the creation, transmittal or use of electronic data hereunder. The limited warranty in this Agreement replaces all other warranties, express or implied, including any warranties of merchantability or fitness for a particular purpose. Professional warranties extend to written or hard copy deliverables only and do <u>not</u> extend to electronic data supplied to Client. Professional warranties in the Agreement which extend to written or hard copy deliverables shall be undisturbed by this Amendment. LAB's liability for medium failure shall be limited to replacement of the electronic data with a hard copy for a period of thirty days from the date of delivery. LAB's electronic data transfer is derived in part from or is created using third party software, and no such third party warrants or assumes any liability regarding use of or undertakes to provide support information relating to LAB's electronic data. LAB will utilize anti-virus programs on a best efforts basis in preparation of the electronic data transfer, but LAB makes no warranty as to the effectiveness of such screening. LAB will also use its best efforts to ensure that its electronic data will meet all criteria as specified by Client, including criteria regarding date/time data, if, and when, included; but LAB makes no warranty as to the appropriateness of the client specified criteria by accepting the same.

In addition to indemnities contained in the underlying agreement between LAB and Client, Client shall hold LAB harmless from any claims, suits or liability arising from or related to electronic data supplied pursuant to this Agreement. Any reuse of original or altered files by Client shall be at Client's risk and without liability or responsibility to LAB, but shall entitle LAB to additional compensation for such unauthorized reuse. In no event will LAB's liability for electronic data include any special, incidental or consequential damages, whether or not LAB has knowledge of the potential for loss or damage.

11. **Force Majeure.** LAB shall have no responsibility or liability to the Client for any failure or delay in performance by LAB which results in whole or in part from any cause or circumstance beyond the reasonable control of LAB. Such causes and circumstances shall include, but not be limited to, acts of God, acts of Client, acts or orders of any government authority, strikes or other labor disputes, natural disasters, accidents, wars, civil disturbances, difficulties or delays in transportation, mail or delivery services, inability to obtain sufficient services or supplies from LAB's usual suppliers, or any other cause beyond LAB's reasonable control.

SCHNITZER STEEL PRODUCTS CO.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 286-5771 Telex 289875 FAX (503) 286-6948

Mr. Dennis Jurries
Oregon Department of Environmental Quality
Northwest Region, Water Quality Program
2020 SW 4th Avenue, Suite 400
Portland, Oregon 97201

October 11, 1999

SUBJECT: Stormwater Pollution Control Plan
Schnitzer Steel Products Co., International Terminals
(File No. 108103)

Dear Mr. Jurries:

Schnitzer Steel Products Co. is pleased to submit the enclosed Stormwater Pollution Control (SWPC) Plan for the scrap metal processing facility located at the International Terminals in north Portland (File No. 108103). The SWPC Plan was prepared in accordance with the requirements of NPDES General Stormwater Discharge Permit 1200-Z. The plan has recently been revised as the result of a routine review of the Plan and existing facility conditions, and is being submitted in accordance with Permit Condition B.3(d).

If you have any questions or comments on the enclosed SWPC Plan, please do not hesitate to contact me directly at (503) 286-6944.

Sincerely,

SCHNITZER STEEL PRODUCTS CO.

MATHEW J. CUSMA
Environmental Administrator

mjc

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

Outfall	Date	Laboratory Results					
		pH	TSS	TPH	Copper	Lead	Zinc
2	10/30/2001	7.04	14	5.0	0.081	0.153	1.040
	5/22/2002	7.22	13	13.0	0.170	0.024	0.268
3	10/30/2001	7.19	10	5.0	0.099	0.070	0.252
	5/22/2002	7.38	11	ND	0.019	ND	0.076
4	10/30/2001	7.94	ND	ND	0.045	0.014	0.040
	5/22/2002	NA	NA	NA	NA	NA	NA
5&6	10/30/2001	7.76	10	ND	0.027	0.028	0.082
	5/22/2002	7.91	ND	ND	0.013	ND	0.015
7	10/30/2001	8.10	36	ND	0.034	0.059	0.231
	5/22/2002	8.42	59	ND	0.025	0.016	0.106
14	10/30/2001	7.67	156	ND	0.193	0.286	1.230
17	5/22/2002	7.09	73	7.1	0.144	0.164	0.654
20	10/30/2001	8.23	28	ND	0.018	0.028	0.057

Notes: 6-9 120mg/L 10mg/L 0.1mg/L 0.4mg/L 0.6mg/L

All analytical results reported in mg/L (ppm) except pH which is reported in SU units.
pH data collected in the field.
ND - Not detected.
NA - Not analyzed.
No floating solids or oil and grease sheen were noted during monthly monitoring.

Table 1
Storm Water Sampling Results
Schnitzer Steel Products Co.
Portland, Oregon

				Laboratory Results				
Outfall	Date	pH	TSS	TPH	Copper	Lead	Zinc	
Benchmarks		6-9	130	10	.100	.400	.600	
2	11-11-99	7.61	200	16	.663	1.23	7.87	
	3-4-00	7.79	160	7	.323	.396	2.91	
	6-11-00	7.64	54	12	.229	.301	1.82	
3	11-11-99	7.42	88	9	.383	.560	3.42	
	3-4-00	7.58	77	ND	.216	.240	1.80	
	6-11-00	7.65	15	8.2	.144	.109	.485	
4	11-11-99	8.46	287	9	2.0	.138	.634	
	3-4-00	10.35	36	ND	.138	.039	.218	
	6-11-00	7.75	11	ND	.101	.006	.039	
5	11-11-99	7.20	113	11	.232	.240	1.57	
	3-4-00	7.91	112	6	.214	.228	1.38	
	6-11-00	7.60	11	ND	.031	.032	.197	
6	11-11-99	9.14	272	14	1.12	.083	.274	
	3-4-00	9.80	26	ND	.079	.012	.031	
	6-11-00	7.98	13	ND	.018	.003	ND	
7	11-11-99	9.45	35	ND	ND	.006	.017	
	3-4-00	8.52	49	ND	.029	.036	.085	
	6-11-00	8.16	ND	ND	.014	.011	.038	
14	11-11-99	8.25	13	12	.052	.034	.547	
	3-10-00	7.28	99	ND	.170	.158	.937	
	6-11-00	NA	NA	NA	NA	NA	NA	
20	11-11-99	9.45	20	ND	ND	.006	.017	
	3-4-00	9.40	14	ND	ND	.006	.018	
	6-11-00	8.45	8	ND	ND	.006	.017	
Notes:								
	All analytical results reported in mg/L (ppm) except pH which is reported in SU units.							
	ND - Not detected.							
	NA - Not Analyzed.							
	No floating solids or oil and grease sheen were noted during monthly monitoring.							

pH - Field measurements collected 6-11-00. 11/11/99 & 3/4/00 [illegible] estimates.

Outfall 1 had no discharge in 1999-2000

16	3-10-00	7.09	40	64	.191	.177	.429
Duplicate of #4 18	3-4-00	10.36	38	ND	.138	.041	.219

Envirotech Systems Ordered: 4/1/2008 Requested Pick Up By: 4/8/2008 **Order: 116712**

7343 E. Marginal Way South, Seattle, WA 98108 Tel: (206) 363 - 9000

Customer:		**P.O. No.:**		**Generator / Site:**		EPA ID	ORD099155574
Customer #	SCHINVPOR			Generator #	SCHSTEPOR2	State ID	
Billing Company	SCHNITZER STEEL			Generator Name	SCHNITZER STEEL		
Address	P.O. BOX 10047			Address	12005 N BURGARD ST		
City ST Zip	PORTLAND, OR 97296-0047			City ST Zip	PORTLAND, OR 97203		
Contact	JIM JAKUBIAK			Contact	JIM JACKUBIACK		
Phone, Fax	(503) 224-9900 X6976	503-286-6960		Phone, Fax			
Sales Person	DON HUNT						

Order Lines:

Item	Description	Profile	Quantity	Unit	Reference Document
LIQ-FB-Q-1	CONSOL CONTENTS OF AEROSOLS	357166-01	1.00	DM15 ~~DF05~~	
REC-Q-1	ALKALINE BATTERIES	4518	3.00	DF05	
REC-Q-13	FLUORESCENT LIGHT TUBES 4 FT & 8FT	150389	4		1-Box 8' 3-Box 4'
CHEM	CHEMIST		2.00	H	
TRAV	TRAVEL		0.50	H	
SF	MILEAGE		20.00	E	
1H2-5	5 GAL 1H2-5		1.00	DF05	
1A1-5	5 GAL 1A1-~~5~~ 10		1.00	E	
BOX-4FT-LT	4' LIGHT TUBE CYLINDER		4.00	CF	
SUR-Q-3	FUEL SURCHARGE 8.5%		1.00	E	

Instructions for Drivers:

driver to bring the 1H2-5 x 1 and the 1A1-5 x 1as well as 4 x 4ft light tube boxes. see driver ins sheet.

The undersigned hereby acknowledges receipt of the materials and/or commencement of services described above on behalf of the parties indicated as "GENERATOR/SITE". On behalf of Generator, I hereby make an appoint Envirotech Systems Generator's true and lawful agent for the purpose of managing and above waste responsibilities. I understand that this does not relieve Generator of its responsibilities as a generator even though title of the waste transfers to Envirotech Systems. Prices quoted herein are subject to waste inspection and acceptance at the destination waste management

BY: [signature] DATE: 4-4-08

SCHN00246523

*** IN CASE OF EMERGENCY CALL 1-800-424-9300 ***

NON-HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12 pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ORD0991555747

Manifest Document No.: 89994

2. Page 1 of 1

3. Generator's Name and Mailing Address
SCHNITZER STEEL
12005 N BURGARD ST
PORTLAND, OR 97203

4. Generator's Phone ( )

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS

6. US EPA ID Number: WAH000012450

A. State Transporter's ID

B. Transporter 1 Phone: (206) 363-9000

7. Transporter 2 Company Name

8. US EPA ID Number

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address
ECOLIGHT NORTHWEST LLC
1915 SOUTH CORGIAT DRIVE
SEATTLE, WA 98108-2818

10. US EPA ID Number: WAH000026371

E. State Facility's ID

F. Facility's Phone: (206) 763-9939

11. WASTE DESCRIPTION	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.
a. MERCURY "UNIVERSAL WASTE-LAMPS", 8, UN2809, PG-III, ERG# 72	4	CF	488	P
b.				
c.				
d.				

G. Additional Descriptions for Materials Listed Above
a) 150389 MERCURY LIGHT TUBES

H. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
1-Box 8'
3-Box 4'

16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name: James L. Jakobcik
Signature: [signature]
Date: Month 11 Day 11 Year 08

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Scott R. Lindsay
Signature: [signature]
Date: Month 04 Day 04 Year 08

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

NON-HAZARDOUS WASTE

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SCHN00246524

*** IN CASE OF EMERGENCY CALL 1-800-424-9300 ***

NON-HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12 pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ORD099155574

Manifest Document No.: 89995

2. Page 1 of 1

3. Generator's Name and Mailing Address:
SCHNITZER STEEL
12005 N BURGARD ST
PORTLAND, OR 97203

4. Generator's Phone ( )

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS

6. US EPA ID Number: WAN000012450

A. State Transporter's ID:

B. Transporter 1 Phone: (206) 363-9000

7. Transporter 2 Company Name:

8. US EPA ID Number:

C. State Transporter's ID:

D. Transporter 2 Phone:

9. Designated Facility Name and Site Address:
ALL BATTERY SALES & SERVICE
727 - 134TH SW
EVERETT, WA 98204

10. US EPA ID Number: EXEMPT

E. State Facility's ID:

F. Facility's Phone: 425-743-7677

11. WASTE DESCRIPTION	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.
a. BATTERIES, DRY, CONTAINING POTASSIUM HYDROXIDE SOLID "UNIVERSAL WASTE-BATTERIES", 8, UN3028, PG-III, ERG#154	3	DF	150	P
b.				
c.				
d.				

G. Additional Descriptions for Materials Listed Above:
(1) 4518 ALKALINE BATTERIES

H. Handling Codes for Wastes Listed Above:

15. Special Handling Instructions and Additional Information:

16. **GENERATOR'S CERTIFICATION:** I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name	Signature	Date Month	Day	Year
X [illegible]	X [illegible]	11	4	08

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year
[illegible]	[illegible]	04	04	08

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.

Printed/Typed Name	Signature	Date Month	Day	Year

GENERATOR

TRANSPORTER

FACILITY

NON-HAZARDOUS WASTE

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SCHN00246525

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 001739995FLE Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
ORD099155574	1	1-800-424-9300	001739995 FLE

5. Generator's Name and Mailing Address
SCHNITZER STEEL
12005 N BURGARD ST
PORTLAND, OR 97203
Generator's Phone: 116712

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: ENVIROTECH SYSTEMS — U.S. EPA ID Number: WAH000012450

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
BURLINGTON ENVIRONMENTAL KENT
20245 - 77TH AVE. S
KENT, WA 98032
Facility's Phone: (253) 872-8030
U.S. EPA ID Number: WAD991281767

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN1263, WASTE PAINT RELATED MATERIAL, 3, PG-II, ERG#128	1	DM ~~DP~~	10	G	D001
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
a) 357166-01 CONSOLIDATED SOLVENTS
REPORT ANY 'RQ' DISCHARGE TO NATIONAL RESPONSE CENTER 800-424-8802, AND 911 EMERGENCY NUMBER OR LOCAL OPERATOR. EMERGENCY CONTACT: JIM JACKUBIACK

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: James L. Jakubiak — Signature: [signature] — Month / Day / Year: 04 / 04 / 08

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Scott R. Cubsty — Signature: [signature] — Month / Day / Year: 04 / 04 / 08
Transporter 2 Printed/Typed Name — Signature — Month / Day / Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month / Day / Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month / Day / Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. **GENERATOR'S INITIAL COPY**

SCHN00246526

U.S. EPA Form 8700-22

Read all instructions before completing this form.

1. This form has been designed for use on a 12-pitch (elite) typewriter which is also compatible with standard computer printers; a firm point pen may also be used—press down hard.
2. Federal regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to complete this form (EPA Form 8700–22) and, if necessary, the continuation sheet (EPA Form 8700–22A) for both inter- and intrastate transportation of hazardous waste.

Public reporting burden for this collection of information is estimated to average: 30 minutes for generators, 10 minutes for transporters, and 25 minutes for owners or operators of treatment, storage, and disposal facilities. This includes time for reviewing instructions, gathering data, completing, reviewing and transmitting the form. Any correspondence regarding the PRA burden statement for the manifest must be sent to the Director of the Collection Strategies Division in EPA's Office of Information Collection at the following address: U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW., Washington, DC 20460. Do not send the completed form to this address.

I. Instructions for Generators

Item 1. Generator's U.S. EPA Identification Number

Enter the generator's U.S. EPA twelve digit identification number, or the State generator identification number if the generator site does not have an EPA identification number.

Item 2. Page 1 of ___

Enter the total number of pages used to complete this Manifest (*i.e.*, the first page (EPA Form 8700-22) plus the number of Continuation Sheets (EPA Form 8700-22A), if any).

Item 3. Emergency Response Phone Number

Enter a phone number for which emergency response information can be obtained in the event of an incident during transportation. The emergency response phone number must:

1. Be the number of the generator or the number of an agency or organization who is capable of and accepts responsibility for providing detailed information about the shipment;
2. Reach a phone that is monitored 24 hours a day at all times the waste is in transportation (including transportation related storage); and
3. Reach someone who is either knowledgeable of the hazardous waste being shipped and has comprehensive emergency response and spill cleanup/incident mitigation information for the material being shipped or has immediate access to a person who has that knowledge and information about the shipment.

Note: Emergency Response phone number information should only be entered in Item 3 when there is one phone number that applies to all the waste materials described in Item 9b. If a situation (*e.g.*, consolidated shipments) arises where more than one Emergency Response phone number applies to the various wastes listed on the manifest, the phone numbers associated with each specific material should be entered after its description in Item 9b.

Item 4. Manifest Tracking Number

This unique tracking number must be pre-printed on the manifest by the forms printer.

Item 5. Generator's Mailing Address, Phone Number and Site Address

Enter the name of the generator, the mailing address to which the completed manifest signed by the designated facility should be mailed, and the generator's telephone number. Note, the telephone number (including area code) should be the normal business number for the generator, or the number where the generator or his authorized agent may be reached to provide instructions in the event the designated and/or alternate (if any) facility rejects some or all of the shipment. Also enter the physical site address from which the shipment originates only if this address is different than the mailing address.

Item 6. Transporter 1 Company Name, and U.S. EPA ID Number

Enter the company name and U.S. EPA ID number of the first transporter who will transport the waste. Vehicle or driver information may not be entered here.

Item 7. Transporter 2 Company Name and U.S. EPA ID Number

If applicable, enter the company name and U.S. EPA ID number of the second transporter who will transport the waste. Vehicle or driver information may not be entered here.

If more than two transporters are needed, use a Continuation Sheet(s) (EPA Form 8700-22A).

Item 8. Designated Facility Name, Site Address, and U.S. EPA ID Number

Enter the company name and site address of the facility designated to receive the waste listed on this manifest. Also enter the facility's phone number and the U.S. EPA twelve digit identification number of the facility.

Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number, and Packing Group)

Item 9a. If the wastes identified in Item 9b consist of both hazardous and nonhazardous materials, then identify the hazardous materials by entering an "X" in this Item next to the corresponding hazardous material identified in Item 9b.

Item 9b. Enter the U.S. DOT Proper Shipping Name, Hazard Class or Division, Identification Number (UN/NA) and Packing Group for each waste as identified in 49 CFR 172. Include technical name(s) and reportable quantity references, if applicable.

Note: If additional space is needed for waste descriptions, enter these additional descriptions in Item 27 on the Continuation Sheet (EPA Form 8700-22A). Also, if more than one Emergency Response phone number applies to the various wastes described in either Item 9b or Item 27, enter applicable Emergency Response phone numbers immediately following the shipping descriptions for those Items.

Item 10. Containers (Number and Type)

Enter the number of containers for each waste and the appropriate abbreviation from Table I (below) for the type of container.

TABLE I.–TYPES OF CONTAINERS

BA = Burlap, cloth, paper, or plastic bags.	DT = Dump truck.
CF = Fiber or plastic boxes, cartons, cases.	DW = Wooden drums, barrels, kegs.
CM = Metal boxes, cartons, cases (including roll-offs).	HG = Hopper or gondola cars.
CW = Wooden boxes, cartons, cases.	TC = Tank cars.
CY = Cylinders.	TP = Portable tanks.
DF = Fiberboard or plastic drums, barrels, kegs.	TT = Cargo tanks (tank trucks).
DM = Metal drums, barrels, kegs.	

Item 11. Total Quantity

Enter, in designated boxes, the total quantity of waste. Round partial units to the nearest whole unit, and *do not* enter decimals or fractions. To the extent practical, report quantities using appropriate units of measure that will allow you to report quantities with precision. Waste quantities entered should be based on actual measurements or reasonably accurate estimates of actual quantities shipped. Container capacities are not acceptable as estimates.

Item 12. Units of Measure (Weight/Volume)

Enter, in designated boxes, the appropriate abbreviation from Table II (below) for the unit of measure.

TABLE II.–UNITS OF MEASURE

G = Gallons (liquids only).	N = Cubic Meters.
K = Kilograms.	P = Pounds.
L = Liters (liquids only).	T = Tons (2000 Pounds).
M = Metric Tons (1000 kilograms).	Y = Cubic Yards.

Note: Tons, Metric Tons, Cubic Meters, and Cubic Yards should only be reported in connection with very large bulk shipments, such as rail cars, tank trucks, or barges.

Item 13. Waste Codes

Enter up to six federal and state waste codes to describe each waste stream identified in Item 9b. State waste codes that are not redundant with federal codes must be entered here, in addition to the federal waste codes which are most representative of the properties of the waste.

Item 14. Special Handling Instructions and Additional Information

1. Generators may enter any special handling or shipment-specific information necessary for the proper management or tracking of the materials under the generator's or other handler's business processes, such as waste profile numbers, container codes, bar codes, or response guide numbers. Generators also may use this space to enter additional descriptive information about their shipped materials, such as chemical names, constituent percentages, physical state, or specific gravity of wastes identified with volume units in Item 12.
2. This space may be used to record limited types of federally required information for which there is no specific space provided on the manifest, including any alternate facility designations; the manifest tracking number of the original manifest for rejected wastes and residues that are re-shipped under a second manifest; and the specification of PCB waste descriptions and PCB out-of-service dates required under 40 CFR 761.207. Generators, however, cannot be required to enter information in this space to meet state regulatory requirements.

Item 15. Generator's/Offeror's Certifications

1. The generator must read, sign, and date the waste minimization certification statement. In signing the waste minimization certification statement, those generators who have not been exempted by statute or regulation from the duty to make a waste minimization certification under section 3002(b) of RCRA are also certifying that they have complied with the waste minimization requirements. The Generator's Certification also contains the required attestation that the shipment has been properly prepared and is in proper condition for transportation (the shipper's certification). The content of the shipper's certification statement is as follows: "I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent." When a party other than the generator prepares the shipment for transportation, this party may also sign the shipper's certification statement as the offeror of the shipment.
2. Generator or Offeror personnel may preprint the words, "On behalf of" in the signature block or may hand write this statement in the signature block prior to signing the generator/offeror certification, to indicate that the individual signs as the employee or agent of the named principal.

Note: All of the above information except the handwritten signature required in Item 15 may be pre-printed.

Burlington Environmental Inc.

RCRA Land Disposal Restriction Notification Form EZ

This form is applicable to characteristic wastes (D codes), listed wastes (F, K, U and P codes), California List Wastes, and Hazardous Debris.

Generator: Schuntzer Steel U.S. EPA I.D. #: OLD099155574

Burlington Profile #: #357466-01 Manifest #: 001739995FUE

The wastes identified on this form are subject to the land disposal restrictions of 40 CFR Part 268. The wastes do not meet the treatment standards specified in Part 268, Subpart D or do not meet the applicable prohibition levels specified in 268.32 or RCRA Section 3004(d). Pursuant to 40 CFR 268.7(a), the required information applicable to each waste is identified below (check all boxes that apply):

Treatability Group: ☐ Wastewater ☒ Nonwastewater

(Wastewaters contain less than 1% filterable solids and less than 1% Total Organic Carbon)

- ☐ D001 Ignitable (except for High TOC) managed in non-CWA/non-CWA-equivalent/non Class I SDWA systems
  (If this box is checked, complete and attach Form UC to address underlying hazardous constituents)
- ☐ D001 Ignitable (except for High TOC) managed in CWA/ CWA-equivalent/Class I SDWA systems
- ☒ D001 High TOC Ignitable (greater than 10% total organic carbon)
- ☐ D002 Corrosive managed in non-CWA/non-CWA-equivalent/non Class I SDWA systems
  (If this box is checked, complete and attach Form UC to address underlying hazardous constituents)
- ☐ D002 Corrosive managed in CWA/ CWA-equivalent/Class I SDWA systems
- ☐ D003 Reactive Sulfides based on 261.23(a)(5)
- ☐ D003 Reactive Cyanides based on 261.23(a)(5)
- ☐ D003 Water Reactives based on 261.23(a)(2),(3) and (4)
- ☐ D003 Explosives based on 261.23(a)(6),(7) and (8)
- ☐ D003 Other Reactives based on 261.23(a)(1)
- ☐ D004 Arsenic ☐ D005 Barium ☐ D006 Cadmium ☐ D006 Cadmium-containing batteries
- ☐ D007 Chromium ☐ D008 Lead ☐ D008 Lead acid batteries
- ☐ D009 High mercury inorganic (>260 mg/kg total), including incinerator residue and residues from RMERC
- ☐ D009 High-mercury organic (>260 mg/kg total), not including incinerator residue
- ☐ D009 Low-mercury (<260 mg/kg total) ☐ D009 All D009 wastewaters
- ☐ D010 Selenium ☐ D011 Silver

If D012-43 boxes are checked, complete and attach Form UC to address underlying hazardous constituents (unless these wastes are to be managed in CWA/CWA-equivalent/Class I SDWA systems):

☐ D012 Endrin	☐ D023 *o*-Cresol	☐ D033 Hexachlorobutadiene
☐ D013 Lindane	☐ D024 *m*-Cresol	☐ D034 Hexachloroethane
☐ D014 Methoxychlor	☐ D025 *p*-Cresol	☐ D035 Methyl ethyl ketone
☐ D015 Toxaphene	☐ D026 Cresols (Total)	☐ D036 Nitrobenzene
☐ D016 2,4-D	☐ D027 *p*-Dichlorobenzene	☐ D037 Pentachlorophenol
☐ D017 2,4,5-TP (Silvex)	☐ D028 1,2-Dichloroethane	☐ D038 Pyridine
☐ D018 Benzene	☐ D029 1,1-Dichloroethylene	☐ D039 Tetrachloroethylene
☐ D019 Carbon tetrachloride	☐ D030 2,4-Dinitrotoluene	☐ D040 Trichloroethylene
☐ D020 Chlordane	☐ D031 Heptachlor	☐ D041 2,4,5-Trichlorophenol
☐ D021 Chlorobenzene	☐ D032 Hexachlorobenzene	☐ D042 2,4,6-Trichlorophenol
☐ D022 Chloroform		☐ D043 Vinyl chloride

In addition, the following wastes are included in this shipment:

- ☒ F001-F005 spent solvents. *(If this box is checked, complete the F001-F005 section on the back of this form. Check the hazardous waste number(s) that applies, and identify the constituents likely to be present in the waste.)*
- ☐ F039 multisource leachate. *(If this box is checked, complete and attach Form UC to identify the individual constituents.)*
- ☐ RCRA Section 3004(d) California list wastes. *(If this box is checked, complete the California List section on the back page of this form.)*
- ☐ Hazardous Debris *(If this box is checked, complete the Hazardous Debris section on the back page of this form.)*

If this shipment carries additional waste codes that are not addressed above, identify them here:

EPA Waste Code	Subcategory (if applicable)	EPA Waste Code	Subcategory (if applicable)

SCHN00246528

Service Location: 509-714 Schnitzer Steel & Investments: PO Box 10047: Portland Or 97296-0047

Date	Ticket	Description	Quantity	U/M	Rate	Amount
		Manf#: na				
		Transportation	31.98	TON	351.78	351.78
		Gnrtr:168-sc				
		Special miscellaneous	31.98	TON	338.99	338.99
		Gnrtr:168-sc				
		Metro fee				79.95
		Yamhill cnty profile wst tax				51.17
		Metro fee soil/envir cleanup				31.98
		Dept of envirn fee				9.59
		Ticket total				863.46
12/13/05	451773	Veh#:21				
		Manf#: na				
		Transportation	32.42	TON	356.62	356.62
		Gnrtr:168-sc				
		Special miscellaneous	32.42	TON	343.65	343.65
		Gnrtr:168-sc				
		Metro fee				81.05
		Yamhill cnty profile wst tax				51.87
		Metro fee soil/envir cleanup				32.42
		Dept of envirn fee				9.73
		Ticket total				875.34
12/13/05	451822	Veh#:21				
		Manf#: na				
		Transportation	32.37	TON	356.07	356.07
		Gnrtr:168-sc				
		Special miscellaneous	32.37	TON	343.12	343.12
		Gnrtr:168-sc				
		Metro fee				80.93
		Yamhill cnty profile wst tax				51.79
		Metro fee soil/envir cleanup				32.37
		Dept of envirn fee				9.71
		Ticket total				873.99
12/13/05	451827	Veh#:3				
		Manf#: na				
		Transportation	32.76	TON	360.36	360.36
		Gnrtr:168-sc				
		Special miscellaneous	32.76	TON	347.26	347.26
		Gnrtr:168-sc				
		Metro fee				81.90
		Yamhill cnty profile wst tax				52.42
		Metro fee soil/envir cleanup				32.76
		Dept of envirn fee				9.83
		Ticket total				884.53
12/13/05	451883	Veh#:21				
		Manf#: na				
		Transportation	32.13	TON	353.43	353.43
		Gnrtr:168-sc				
		Special miscellaneous	32.13	TON	340.58	340.58
		Gnrtr:168-sc				
		Metro fee				80.33
		Yamhill cnty profile wst tax				51.41
		Metro fee soil/envir cleanup				32.13
		Dept of envirn fee				9.64
		Ticket total				867.52
12/13/05	451891	Veh#:3				
		Manf#: na				
		Transportation	32.99	TON	362.89	362.89
		Gnrtr:168-sc				

INLAND TECHNOLOGY INCORPORATED

401 East 27th Street, Tacoma, Washington 98421

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Seattle (253) 838-9869
Web Site www.inlandtech.com

Toll Free (800) 552-3100
FAX (253) 593-8749
E-mail inland@inlandtech.com

BREAKTHROUGH®

A state of the art solvent designed to help users break out of the tangle of regulations regarding emissions, disposal, and industrial health hazards. **BREAKTHROUGH®** is a virtually odorless, low toxicity, high-purity hydrocarbon that exhibits a very low degree of irritancy to the eyes and is non-irritating to the skin. It has low vapor pressure to control volatile organic compound (VOC) emissions, is non-photochemically reactive, non-carcinogenic and is exempt from SARA, Title III, Sections 302 or 313, CERCLA, and RCRA requirements. **BREAKTHROUGH®** has no listed components and no characteristics of hazardous waste per EPA, and worker exposure is not regulated by the OSHA Z-list. **BREAKTHROUGH® enjoys the following specifications:**

BOEING AIRCRAFT COMPANY

- BAC 5750 General Solvent Cleaning on Boeing Aircraft.

U.S. ARMY

- "Based upon favorable toxicity, regulatory and use data; a toxicity clearance is granted for **BREAKTHROUGH®** for use as a degreasing solvent."
  U.S. Army Center for Health Promotion and Preventative Medicine, 28 January, 1997

U.S. ARMY

- APC Tech Message #92 Authorizes **BREAKTHROUGH®** as an Environmentally Compliant Replacement for PD-680 Type I and Type II for cleaning U.S. Army Weapons, Ground Vehicles, Equipment, and Aviation materials.

U.S. ARMY

- TACOM - Meets Military Specification for MIL PRF-680, Type II.

U.S. ARMY

- TACOM – ACALA Maintenance Advisory Message No. 97-17. Authorizes **BREAKTHROUGH®** for use on all small arms and aircraft armament systems.

U.S. ARMY

- TB 43-0135 Recommended substitutes for ozone depleting substances used on communications-electronics equipment.

U.S. AIR FORCE

- Message R1212433Z APR 00 authorizes **BREAKTHROUGH®** as MIL PRF-680, Type II.

GE AIRCRAFT ENGINES

- C04-002 **BREAKTHROUGH®** is approved for all engine cleaning applications calling for PD-680 Type I and Type II.

PRATT & WHITNEY

- PMC 9001 **BREAKTHROUGH®** approved to Engine Cleaning Specification.

CFM AIRCRAFT ENGINES

- CP 2011 **BREAKTHROUGH®** is approved for all aircraft engine cleaning applications calling for PD-680 Type I and Type II.

ROLLS ROYCE AIRCRAFT ENGINES

- **BREAKTHROUGH®** is approved for all aircraft engine cleaning applications calling for PD-680 Type II.

INDEPENDENT LABORATORY TESTS OF **BREAKTHROUGH®** FOR MATERIAL COMPATIBILITY AND PERFORMANCE

Tests Conducted By Scientific Material International Inc., An internationally recognized Aerospace Testing Laboratory

TEST PERFORMED	RESULTS
CHLORINE CONTENT	Pass
NON-VOLATILE RESIDUE	Pass
STOCK LOSS CORROSION	SAE ARP 1755
AMS 4037 Aluminum (Bare)	Pass
AMS 4375 Magnesium	Pass
AMS 4507 Copper	Pass
AMS 4911 Titanium	Pass
AMS 5040 Carbon Steel	Pass
AMS 5504 Stainless Steel	Pass
AMS 5536 Nickel (Hastalloy X)	Pass
AMS 4037/2470 Aluminum Anodized	Pass
AMS 5504/2400 Stainless Steel Cad Plated	Pass
IMMERSION CORROSION	ASTM F 483
AMS 4037 Aluminum	Pass
AMS 4377 Magnesium	Pass
AMS 4911 Titanium	Pass
AMS 5040 Carbon Steel	Pass
AMS 5040 Carbon Steel Cad Plated	Pass
SANDWICH CORROSION	ASTM F 1100
2024-T3 Anodized	Pass
2024-T3 Alclad	Pass
7075-T6 Anodized	Pass
7075-T6 Alcad	Pass
TITANIUM STRESS CORROSION	ASTM F 945
AMS 4911	Pass
AMS 4916	Pass
HYDROGEN EMBRITTLEMENT	ASTM 519
	Pass
COATING ADHESION	PESD-STD 141
METHOD NO. 6301	Pass
EFFECT ON PAINTED SURFACES	
Epoxy Topcoat	Pass
Polyurethane	Pass
Enamel	Pass
STRESS CRAZING OF ACRYLIC PLASTIC (Mil-P-5425 and Mil-P-25690)	Pass
STRESS CRAZING OF POLYCARBONATE PLASTIC (Mil-P-83310)	Pass
EFFECT ON POLYSULFIDE SEALANTS	Pass
RUBBER COMPATIBILITY	Pass
EFFECT ON POLYIMIDE INSULATED WIRE	Pass

MATERIAL SAFETY DATA SHEET

This form complies with OSHA Hazardous Communication Standard, 29 CFR 1910.1200.

SECTION I

BREAKTHROUGH®

Inland Technology Incorporated • 401 East 27th Street • Tacoma, WA 98421

Product Information: 1-800-552-3100 Transportation Emergencies: 1-800-255-3924

Date: November 27, 2001 **MSDS No.** 03245 **Product Number:** FB245

Synonyms: N/A

SECTION II - INGREDIENTS AND HAZARD IDENTIFICATION

Substances NOT considered hazardous by OSHA may also be listed.

COMPONENTS	CAS #	PEL	TLV	OTHER
C12 - C13 Paraffinic Hydrocarbons	64742-48-9	Not Listed	Not Listed	

SECTION III - PHYSICAL/CHEMICAL CHARACTERISTICS

Initial Boiling Point: 370°F
Vapor Pressure (@ 20°C mmHg): 0.1
Evaporation Rate (n-Butyl Acetate=1): <.1
Volatile by Volume: 100%
Specific Gravity (H_2O=1): .77
Vapor Density (air=1): >5
Solubility: Not water soluble
Appearance and Odor: Clear with mild petroleum odor

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

Flash point by: 150°F PMCC
Flammable Limits LEL: 0.8% **UEL:** 7%
Extinguishing Media: Foam, water spray, dry chemical, carbon dioxide.
Special Fire Fighting Procedures: Use air supplied breathing equipment for enclosed and confined spaces or as otherwise needed.
Unusual Fire and Explosion Hazards: None known.

SECTION V - REACTIVITY DATA

Chemical Incompatibility: Avoid contact with strong acids and strong oxidizing agents.
Hazardous Decomposition Products: CO_2,CO, and hydrocarbons
Hazardous Polymerization: Will not occur
Stability: Stable

SCHN00246598

SECTION VI - HEALTH HAZARD DATA

Signs and Symptoms of Overexposure

Acute Health Effects: Liquid contacting the eyes may cause eye irritation. Low order acute oral and dermal toxicity. Inhalation of vapors can cause irritation to nose, throat and upper respiratory tract.

Chronic Health Effects: Prolonged or repeated skin exposure can lead to mild irritation, defatting and dermatitis.

Carcinogenic Ingredients: None

Primary Routes of Entry: Skin, eyes, and inhalation.

Medical Conditions Aggravated by Exposure: May aggravate existing dermatitis.

Emergency and First-Aid Procedures:

Eyes: If eye contact occurs flush with water for at least 15 minutes or until irritation subsides. If irritation persists contact physician.

Skin: In case of skin contact, remove any contaminated clothing and wash skin thoroughly with soap and water.

Inhalation: If overcome by vapor, remove from exposed area and call physician immediately.

Ingestion: DO NOT induce vomiting; call physician immediately.

If conditions persist, get medical attention.

SECTION VII - PRECAUTIONS FOR SAFE HANDLING AND USE

Steps to Take in Case Material is Released: Shut off and eliminate all ignitable sources. Contain and collect material. Absorb residue.

Waste Disposal Method: Contact federal, state, county or local environmental regulatory agencies for guidance.

Handling and Storage: Use and store away from heat, sparks, and open flame. Keep container sealed when not in use.

SECTION VIII - CONTROL MEASURES

Personal Protection Equipment

Respirator: None normally required

Gloves: Use chemical-resistant gloves, if needed

Eye Protection: Use splash goggles or face shield when eye contact may occur.

Other Protective Equipment: None normally required

Workplace Considerations

Ventilation: Mechanical ventilation not normally required, unless product is heated, and/or is atomized in a confined space.

Engineering Controls: Eye wash or sterile eye rinse. Keep container closed. Do not store near heat or flame.

Work Practices: Read and understand all cautions, labels, and MSDS before using this product.

Hygiene Practices: Minimize breathing vapor or mist. Avoid prolonged or repeated contact with skin. Wash contaminated clothing before reuse.

Keep All Chemicals Out of the Reach of Children

The information and recommendations contained herein are presented in good faith and believed to be correct and reliable to the best of Inland Technology's knowledge. Inland Technology, or its distributors, do not warrant or guarantee reliability, and shall not be liable for any loss or damage arising out of the use thereof. Contact Inland to confirm, in advance of need, that the information is current, applicable, and suitable to each circumstance.

SCHN00246599

Memorandum

To: File

From: Jim Jakubiak

Date: 2/28/03

Re: Waste Disposal Summary -2002

According to Linda (waste specialist) with Envirotech Systems, they removed the following materials form the following locations:

July 2002 – Premier Edible Oils – oily water and UNAX AW 46 (nonhazardous – solid waste). Taken to Spencer Environmental

July 2002 – IT – Flashlight batteries, cell phone batteries, PCB ballasts and a single 10-gallon (15 pound) container of a flammable liquid. The ballasts are TASCA materials and the batteries were universal wastes. The 15 pounds of flammables were a one-time small volume event.

August 2002 – Everett Site – Removed 2 drums of paint and cement that were abandoned on-site. Both materials were non-hazardous wastes.

SCHN00246605

Registration Verification Report 2002

1 *968

1. DEQ ID No: **ORD099155574** Name: **Schnitzer Steel Products Co**
Location: **12005 N BURGARD ROAD**
PORTLAND, OR 97213
Site Contact Name: **James Jakubiak** Site Contact Phone: **(503) 286-6976**

Current information, if different from above:

Your Standard Industrial Classification (SIC) code is currently: **5093: Scrap And Waste Materials**

Current code if different:

DEQ
State of Oregon Department of Environmental Quality

Your current employee count is listed as 99 Please indicate the correct count if it has change

Verify the information in the left column, and make any corrections in the right column:

The owner of Schnitzer Steel Products Co is:

2. Indvidual or Organization: **Schnitzer Steel ~~Industries, Inc.~~**	Indvidual or Organization: Schnitzer Steel Products Co.
Address: **PO Box 10047** **Portland, OR 97296-0047**	Address:
Phone: **503-224-9900**	Phone:

The owner of the property on which Schnitzer Steel Products Co is located is:

3. Individual or Organization: **Schnitzer Investment ~~Corporation~~** Corp.	Individual or Organization: Schnitzer Investment Corp.
Address: **PO Box 10047** **Portland, OR 97296-0047**	Address:
Phone: **(503) 224-9900**	Phone:

The address for DEQ to send hazardous waste information to Schnitzer Steel Products Co is:

4. Forms Contact: **Jim Jakubiak**	Forms Contact:
Organization: **~~Schnitzer Investment Corporation~~**	Organization: Schnitzer Steel Products Co.
Address: **PO Box 10047** **Portland, OR 97296-0047**	Address:
Internet E-Mail: **Data missing, please update**	Internet E-Mail:
Phone: **(503) 286-6976**	Phone:

The address for DEQ to send hazardous waste fee invoices for Schnitzer Steel Products Co. is:

5. Fee Contact: **Jim Jakubiak**	Fee Contact:
Organization **~~Schnitzer Investment Corporation~~**	Organization: Schnitzer Steel Products Co.
Address: **PO Box 10047** **Portland, OR 97296-0047**	Address:
Phone: **(503) 286-6976**	Phone:

Hazardous waste generator status:

6. Schnitzer Steel Products Co last reported as a Conditionally Exempt Generator on the 2001 Annual Report.
What was the generator status for Schnitzer Steel Products Co in 2002, based on monthly generation records?

☐ Large Quantity Generato ☐ Small Quantity Generato ☒ Conditionally Exempt Generato

12/16/2002

SCHN00246606

7. If the information for this facility has changed from what is preprinted in **Box 1** from the front of this form, then check all that apply. If no changes occurred, then skip to Box 8.

- ☐ The business (as preprinted) is no longer active at this location. We are a different company or a company new to this location. Date we opened for business: _____
- ☐ The business is the same; we have a new name.
- ☐ The location of the business has not changed. The local government modified the address.
- ☐ The business moved to a new location. ☐ I wish to apply for a new site-specific DEQ/EPA ID Number for the company's new location.

8. Has the ownership of this facility changed from what is preprinted in **Box 2** from the front of this form?

☐ **Yes** (If yes, Answer Questions 8a-8b) ☒ **No** (Skip to Box 9) Name correction was made.

8a. What was the date of the ownership change? _____

8b. Are you completing this report for:

- ☐ The previous (preprinted name) company up to the time of closure? (Complete Box 9.)
- ☐ The current (new) company?
- ☐ Filing for the full calendar year?
- ☐ Filing for only that part of the year following purchase?

9. Indicate one of the following:

- ☒ I wish to keep the assigned DEQ/EPA Identification Number Active. (Skip to Box 10)
- ☐ I wish to cancel the assigned DEQ/EPA Identification Number because this facility does not generate or manage hazardous waste for the following reason **(Date must be provided)**:
  - ☐ Closure of business (Date of Closure: _____)
  - ☐ Completion of a one-time cleanup and waste management activity (Date Completed: _____)
  - ☐ Change in business activity (Explain and Provide Date: _____ _____)
  - ☐ Other (Explain and Provide Date: _____ _____)

Note: The DEQ/EPA Identification Number is assigned to the physical location of the site and cannot be reassigned to a different location. The ID number is required for certain facilities such as: Hazardous Waste (HW) Transporters; Large Quantity HW Generators; Small Quantity HW Generators; Treatment, Storage, Disposal Facilities; HW Recycling Facilities; Marketers or Burners of HW Fuel; and facilities that engaged in some Used Oil or Universal Waste Activities. Conditionally Exempt Generators may also need an ID number for certain waste management activities.

10. ***I certify** under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.*

Signature: [signature] Date: 2-27-03

Name (please print): Jim Jakubiak Title: Environmental Administrator

Mail completed form to:
Oregon DEQ
Land Quality Division
Attn: Hazardous Waste Forms Clerk
811 SW Sixth Avenue
Portland, OR 97204-1390

***Remember:** If you were a small or large quantity generator during any part of 2002, you must complete the Waste Generation & Management Answer Sheets and attach them to this form. If filing Answer Sheets electronically, an Electronic Certification must be attached.*

Questions: (503) 229-5470 or (800) 452-4011 or visit our Website at www.deq.state.or.us/wmc/hw/hwrptonlineforms.htm

Memorandum

To: File

From: Jim Jakubiak

Date: 2/28/03

Re: Waste Disposal Summary -2002

According to Linda (waste specialist) with Envirotech Systems, they removed the following materials form the following locations:

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August 2002 – Everett Site – Removed 2 drums of paint and cement that were abandoned on-site. Both materials were non-hazardous wastes.

SCHN00246608

Oregon
John A. Kitzhaber, M.D., Governor

Department of Environmental Quality
811 SW Sixth Avenue
Portland, OR 97204-1390
(503) 229-5696
TDD (503) 229-6993

December 24, 2002

Enclosed are your company's Registration Verification Report (RVR) form, the Hazardous Waste Reporting Forms Booklet, and an Electronic Reporting Certification form. Use these forms to report hazardous waste activities for calendar year 2002 as required by Oregon Administrative Rules 340-102-0012, 340-102-0041 and 340-104-0075. Information on where to find additional assistance is provided on the last page of this letter.

It is important that you report your hazardous waste generator status correctly and complete the annual report forms to accurately reflect your company's hazardous waste activities for calendar year 2002. The information that you provide is the basis for determining generator fees, for determining regulatory compliance requirements, and for establishing eligibility to participate in DEQ's Toxics Use/Waste Reduction Assistance Program and Conditionally Exempt Generator (CEG) collection events.

The completed forms are due back to DEQ by **March 1, 2003**. Mail the completed forms to: **Oregon DEQ, Land Quality Division, Attn: Hazardous Waste Forms Clerk, 811 SW Sixth Avenue, Portland, OR, 97204-1390.** Upon written request and reasonable justification, DEQ may grant an extension to the reporting deadline of up to 30 days. Extensions can be requested by writing to this address before March 1, 2003, by emailing Nancy Dollar at dollar.nancy@deq.state.or.us or by faxing a request to Ms. Dollar at (503) 229-6977. A written confirmation of the approval for the extension will be mailed to you.

Registration Verification Report (RVR)

The RVR was generated using information last reported by your facility. Please review your RVR and do the following:

- Verify that all preprinted facility information on the front of the RVR is correct and complete. Provide any updated information in the spaces provided.
- Verify your generator status for calendar year 2002. Your generator status is determined by the largest amount of hazardous waste you generated or had on-site in **any one month** during the 2002 calendar year. Mark your generator status in Box 6 of the RVR. Do not leave blank.
- On the reverse side of the RVR answer all of the questions that are applicable in Boxes 7 and 8. These boxes provide necessary additional information if an update was provided in Box 1 or 2 (e.g., ownership change, closure of business, etc.) and will enable us to process the RVR without having to request more information.
- The information in Box 9 is required for the cancellation of the DEQ/EPA Identification Number if your business has stopped generating and managing hazardous waste. Most facilities should simply mark the first box indicating they wish to keep their DEQ/EPA Identification Number active.
- The generator or his/her authorized representative **must sign the RVR**. The forms will not be accepted without a signature.
- If your facility was a Conditionally Exempt Generator (CEG) during **every month** of 2002, you only need to return a completed and signed RVR.

SCHN00246609

2002 Hazardous Waste Reporting Forms Booklet

The Forms Booklet includes the Hazardous Waste Generation and Management Answer Sheet and the Hazardous Waste Received Answer Sheet, plus all the reference material and instructions needed to complete these forms. There were a few modifications made to the 2002 annual reporting forms. The changes made involved the Waste Generation & Management Answer Sheet and include:

- The Monthly Generation Worksheet on the answer sheet is now optional and is provided only as a tool. It is recommended for Small Quantity Generators.
- New Questions #10 and #10A on the answer sheet asks if the waste stream contains mercury and if so, in what percentage.
- New Question #13 on the answer sheet asks that the waste carried over from 2001 be reported. The answer from Question #13 is needed to reconcile the amounts reported on the 2002 answer sheet.
- New Frequently Asked Question #11 in the Forms Booklet explains how to reconcile the waste amounts reported on the answer sheet.
- New Frequently Asked Question #12 in the Forms Booklet explains how to report satellite accumulation waste.
-

2002 Waste Generation & Management Answer Sheet

If you are a Large Quantity Generator (LQG) or Small Quantity Generator (SQG) you will need to complete the 2002 Hazardous Waste Generation and Management Answer Sheet located on Pages 27 and 28 of the enclosed Forms Booklet. Please follow the "Question" guidance on Pages 22 through 25 when filling out the Answer Sheet. A separate answer sheet is required for each waste stream that your facility generates. Tear out the perforated answer sheet and make as many copies as you need before you complete the forms.

The answers to a few frequently asked questions are listed below. Clarification on these items can be found in the Forms Booklet or by calling one of the telephone numbers provided on the last page.

- Hazardous waste that is treated on-site and rendered non-hazardous before shipment to a solid waste landfill must be reported on the Waste Generation & Management Answer Sheet for its on-site management. (Forms Booklet, Page 9, Frequently Asked Question #7)
- Hazardous waste that is treated on-site and creates a hazardous residual must be reported on two Waste Generation & Management Answer Sheets. One answer sheet for the on-site treatment (e.g., distillation) and one answer sheet for the hazardous residual (e.g., sludge). (Page 9, #7)
- When reporting off-site shipments subject to multiple management methods, the final management method that the Treatment, Storage, Disposal facility (TSD) provided must be reported. (Page 9-10, #7 and #9). Do not use the Management Code M141as that is for Transfer Facilities only.

The Answer Sheets can be submitted to DEQ online at: www.deq.state.or.us/wmc/hw/hwrptonlineforms.htm. If you plan to file electronically, the enclosed "**Electronic Reporting Certification**" form must be mailed to DEQ, along with the RVR form, by March 1, 2003.

2002 Hazardous Waste Received Answer Sheet

If your facility received hazardous waste from off-site for treatment, storage, disposal or recycling, you must complete the 2002 Hazardous Waste Received Answer Sheet. Check the instructions on Page 31 of the Forms Booklet to determine if you are required to file this report. The Waste Received Answer Sheets can also be submitted online at the Internet address given above.

If you need help...

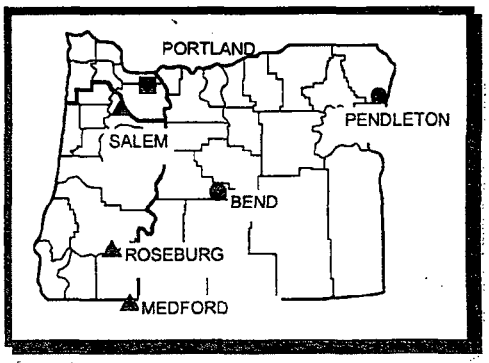
- If you have questions about hazardous waste regulations, including your generator status, please contact DEQ's Toxics Use/Waste Reduction Assistance Program (TU/WRAP) staff at your nearest regional office. A list of TU/WRAP staff names and telephone numbers is provided below. TU/WRAP staff provides free and confidential technical assistance to businesses throughout Oregon. Besides answering your questions by telephone, TU/WRAP staff can provide on-site technical assistance visits upon request. These non-regulatory visits are aimed at identifying where you may save money through reduced disposal costs and less regulation, identifying areas that can be improved upon, and clarifying how the regulations affect your specific operations. TU/WRAP staff can also provide you fact sheets and resource guides on numerous hazardous waste related subjects. Call one of the telephone numbers listed below if you would like more information.

- If you have questions regarding the report forms, please contact Sylvia Krummann in Portland at (503) 229-5470 or toll-free within the State of Oregon at 1-800-452-4011. You may also email your questions to krummann.sylvia@deq.state.or.us

- Check out our web site at www.deq.state.or.us/wmc/hw/hw.htm for information on hazardous waste management, technical resources, laws, regulations, fact sheets, plus a lot more.

DEQ REGIONAL OFFICES

Call toll-free within the State of Oregon at 1-800-452-4011



● **Eastern Region**
2146 NE 4th, Suite 104
Bend, OR 97701
John MacKellar
(541) 388-6146 x229 or mackellar.john@deq.state.or.us

■ **Northwest Region**
2020 SW 4th, Suite 400
Portland, OR 97201
Jay Collins
(503) 229-5165 or collins.jay@deq.state.or.us

Laurey Cook
(503) 229-5058 or cook.laurey@deq.state.or.us

Herrington Rose
(503) 229-5560 or rose.herrington@deq.state.or.us

▲ **Western Region**

750 Front St. NE, Suite 120
Salem, OR 97310
Eric Clark
(503) 378-8240 x253 or
clark.eric@deq.state.or.us

and

201 W. Main St., Suite 2-D
Medford, OR 97501
Wayne Kauzlarich
(541) 776-6010 X227 or
kauzlarich.wayne@deq.state.or.us

Bart Collinsworth
(503) 378-8240 X258 or collinsworth.bart@deq.state.or.us

WO # 595320

Emergency Contact Telephone Number

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ORD099155574

Manifest Document No. 18352

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
SCHNITZER STEEL
P.O. BOX 10047
PORTLAND , OR 97295

SITE ADDRESS: SCHNITZER STEEL
12005 N. BURGARD ST.
PORTLAND , OR 97203
ATTN TIM TODD/J JAKUB

4. Generator's Phone (503 286-6944

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name
ENVIROTECH SYSTEMS, INC.

6. US EPA ID Number WAH000012450

C. State Transporter's ID

D. Transporter's Phone (206) 363-9000

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
BURLINGTON ENVIRONMENTAL, INC.
20245 77TH AVE. SOUTH
KENT ,WA 98032

10. US EPA ID Number WAD991281767

G. State Facility's ID

H. Facility's Phone 2538728030

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	WASTE FLAMMABLE LIQUIDS, N.O.S. 3 UN1993 PGII		001	CF	00020	P	D001
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
A.BE#ETSI3D-00, DM#SS-L01, WASTE WT #, ERG#128

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

EMERGENCY INFORMATION CONTACT (206) 363-9000 OR (425) 771-0452.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: James L. Jakubiak | Signature: [signature] | Month 07 Day 02 Year 02

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: SCOTT R. LINDSAY | Signature: [signature] | Month 07 Day 02 Year 02

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Cathy Sunck | Signature: Cathy Sunck | Month 07 Day 02 Year 02

GENERATOR

TRANSPORTER

FACILITY

ORIGINAL - RETURN TO GENERATOR

SCHN00246693

UNIFORM HAZARDOUS WASTE MANIFEST AND INSTRUCTIONS EPA FORM 8700-22

U.S. EPA Form 8700-22

Read all instructions before completing this form.

This form has been designed for use on a 12-pitch (elite) typewriter; a firm point pen may also be used – press down hard.

Federal regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation.

Federal regulations also require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage and disposal facilities to complete the following information:

GENERATORS

Item 1. Generator's U.S. EPA ID Number – Manifest Document Number

Enter the generator's U.S. EPA twelve digit identification number and the unique five digit number assigned to this Manifest (e.g., 00001) by the generator.

Item 2. Page 1 of –

Enter the total number of pages used to complete this Manifest, i.e., the first page (EPA Form 8700-22) plus the number of Continuation Sheets (EPA Form 8700-22A), if any.

Item 3. Generator's Name and Mailing Address

Enter the name and mailing address of the generator. The address should be the location that will manage the returned Manifest forms.

Item 4. Generator's Phone Number

Enter a telephone number where an authorized agent of the generator may be reached in the event of an emergency.

Item 5. Transporter 1 Company Name

Enter the company name of the first transporter who will transport the waste.

Item 6. U.S. EPA ID Number

Enter the U.S. EPA twelve digit identification number of the first transporter identified in item 5.

Item 7. Transporter 2 Company Name

If applicable, enter the company name of the second transporter who will transport the waste. If more than two transporters are used to transport the waste, use a Continuation Sheet(s) (EPA Form 8700-22A) and list the transporters in the order they will be transporting the waste.

Item 8. U.S. EPA ID Number

If applicable, enter the U.S. EPA twelve digit identification number of the second transporter identified in item 7.

Note.–If more than two transporters are used, enter each additional transporter's company name and U.S. EPA twelve digit identification number in items 24-27 on the *Continuation Sheet (EPA Form 8700-22A). Each Continuation Sheet has space to* record two additional transporters. Every transporter used between the generator and the designated facility must be listed.

Item 9. Designated Facility Name and Site Address

Enter the company name and site address of the facility designated to receive the waste listed on this Manifest. The address must be the site address, which may differ from the company mailing address.

Item 10. U.S. EPA ID Number

Enter the U.S. EPA twelve digit identification number of the designated facility identified in item 9.

Item 11. U.S. DOT Description [Including Proper Shipping Name, Hazard Class, and ID Number (UN/NA)]

Enter the U.S. DOT Proper Shipping Name, Hazard Class, and ID Number (UN/NA) for each waste as identified in 49 CFR 171 through 177.

Note.–If additional space is needed for waste descriptions, enter these additional descriptions in item 28 on the Continuation Sheet (EPA Form 8700-22A).

Item 12. Containers (No. and Type)

Enter the number of containers for each waste and the appropriate abbreviation from Table I (below) for the type of container.

Table I – Types of Containers

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
TP = Tanks portable	CF = Fiber or plastic boxes, cartons, cases
TT = Cargo tanks (tank trucks)	BA = Burlap, cloth, paper or plastic bags
TC = Tank cars	
DT = Dump truck	

Item 13. Total Quantity

Enter the total quantity of waste described on each line.

Item 14. Unit (Wt./Vol.)

Enter the appropriate abbreviation from Table II (below) for the unit of measure.

Table II – Units of Measure

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. Special Handling Instructions and Additional Information

Generators may use this space to indicate special transportation, treatment, storage, or disposal information or Bill of Lading information. States may not require additional, new, or different information in this space. For international shipments, generators must enter in this space the point of departure (City and State) for those shipments destined for treatment, storage, or disposal outside the jurisdiction of the United States.

Item 16. Generator's Certification

The generator must read, sign (by hand), and date the certification statement. If a mode *other than* highway is used, the word "highway" should be lined out and the appropriate mode (rail, water, or air) inserted in the space below. If another mode *in addition to* the highway mode is used, enter the appropriate additional mode (e.g., *and rail)* in the space below.

Primary exporters shipping hazardous wastes to a facility located outside of the United States must add to the end of the first sentence of the certification the following words "and conforms to the terms of the EPA Acknowledgment of Consent to the shipment."

In signing the waste minimization certification statement, those generators who have not been exempted by statute or regulation from the duty to make a waste minimization certification under section 3002(b) of RCRA are also certifying that they have complied with the waste minimization requirements.

Generators may preprint the words. "On behalf of" in the signature block or may hand write this statement on the signature block prior to signing the generator certifications.

Note.–All of the above information *except* the handwritten signature required in item 16 may be preprinted.

TRANSPORTERS

Item 17. Transporter 1 Acknowledgement of Receipt of Materials

Enter the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Item 18. Transporter 2 Acknowledgement of Receipt of Materials

Enter, if applicable, the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Note.–International Shipments – Transporter Responsibilities.

Exports–Transporters must sign and enter the date the waste left the United States in item 15 of Form 8700-22.

Imports–Shipments of hazardous waste regulated by RCRA and transported into the United States from another country must upon entry be accompanied by the U.S. EPA Uniform Hazardous Waste Manifest. Transporters who transport hazardous waste into the United States from another country are responsible for completing the Manifest (40 CFR 263.10(c)(1)).

OWNERS AND OPERATORS OF TREATMENT, STORAGE, OR DISPOSAL FACILITIES

Item 19. Discrepancy Indication Space

The authorized representative of the designated (or alternate) facility's owner or operator must note in this space any significant discrepancy between the waste described on the Manifest and the waste actually received at the facility.

Owners and operators of facilities located in unauthorized States (i.e., the U.S. EPA administers the hazardous waste management program) who cannot resolve significant discrepancies within 15 days of receiving the waste must submit to their Regional Administrator (see list below) a letter with a copy of the Manifest at issue describing the discrepancy and attempts to reconcile it (40 CFR 264.72 and 265.72).

Owners and operators of facilities located in authorized States (i.e., those States that have received authorization from the U.S. EPA to administer the hazardous waste program) should contact their State agency for information on State Discrepancy Report requirements.

EPA Regional Administrators

Regional Administrator, U.S. EPA Region I, J.F. Kennedy Fed. Bldg., Boston, MA 02203

Regional Administrator, U.S. EPA Region II, 26 Federal Plaza, New York, NY 10278

Regional Administrator, U.S. EPA Region III, 6th and Walnut Sts., Philadelphia, PA 19106

Regional Administrator, U.S. EPA Region IV, 345 Courtland St., NE., Atlanta, GA 30365

Regional Administrator, U.S. EPA Region V, 230 S. Dearborn St., Chicago, IL 60604

Regional Administrator, U.S. EPA Region VI, 1201 Elm Street, Dallas, TX 75270

Regional Administrator, U.S. EPA Region VII, 324 East 11th Street, Kansas City, MO 64106

Regional Administrator, U.S. EPA Region VIII, 1860 Lincoln Street, Denver, CO 80295

Regional Administrator, U.S. EPA Region IX, 215 Freemont Street, San Francisco, CA 94105

Regional Administrator, U.S. EPA Region X, 1200 Sixth Avenue, Seattle, WA 98101

Item 20. Facility Owner or Operator: Certification of Receipt of Hazardous Materials Covered by This Manifest Except as Noted in Item 19

Print or type the name of the person accepting the waste on behalf of the owner or operator of the facility. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Items A-K are not required by Federal regulations for intra- or interstate transportation. However, States may require generators and owners or operators of treatment, storage, or disposal facilities to complete some or all of items A-K as part of State manifest reporting requirements. Generators and owners and operators of treatment, storage, or disposal facilities are advised to contact State officials for guidance on completing the shaded areas of the Manifest.

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street SW., Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office Management and Budget, Washington, DC 20503.

363736 NDW

Emergency Contact Telephone Number

(208) 363-8000 OR (425) 771-0452

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ORD098155574

Manifest Document No.: 16351

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
SCHNITZER INVESTMENT CORP.
P.O. BOX 10047
PORTLAND, OR 97296-0047

SITE ADDRESS: SCHNITZER STEEL
12005 N. BURGARD ST.
PORTLAND, OR 97203
ATTN: JIM JAKUBIAK

4. Generator's Phone (503) -285-5975

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC.

6. US EPA ID Number: WAH000010245 0

C. State Transporter's ID

D. Transporter's Phone: ~~(208) 363-8000~~

7. Transporter 2 Company Name: Tri State Motor Transit

8. US EPA ID Number: MOD095038998

E. State Transporter's ID

F. Transporter's Phone: (800) 234-8768

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT OF THE NW
17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812

10. US EPA ID Number: ORD082452353

G. State Facility's ID

H. Facility's Phone: (541) 454-2843

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	HM	11. US DOT Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ	ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S. 9 NA3077 PG III RQ (PCB) ~~(POLYCHLORINATED DIPHENYLS)~~	001	DM	100 00055	K	X0052
b.					87/11/02		
c.							
d.							

J. Additional Descriptions for Materials Listed Above
A CWM#CW1012, ES# 02-151-15-01, ERG# 171

K. Handling Codes for Wastes Listed Above
CERTIFICATE OF DISPOSAL REQUIRED

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: James L. Jakubiak | Signature | Month Day Year: 10 7 02

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: SCOTT R. LINDSAY | Signature | Month Day Year: 10 7 02

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: Tony McManus | Signature | Month Day Year: 10 7 03 02

FACILITY

19. Discrepancy Indication Space
QD reached per Mike Jeffers / Envirotech 7/11/02 [illegible]

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Nicolas Wuscaver | Signature | Month Day Year: 10 7 08 02

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

ORIGINAL - RETURN TO GENERATOR BMS

7-8 [illegible] (Rev. 2-90)

SCHN00246695

UNIFORM HAZARDOUS WASTE MANIFEST AND INSTRUCTIONS EPA FORM 8700-22

U.S. EPA Form 8700-22

Read all instructions before completing this form.

This form has been designed for use on a 12-pitch (elite) typewriter; a firm point pen may also be used – press down hard.

Federal regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation.

Federal regulations also require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage and disposal facilities to complete the following information:

GENERATORS

Item 1. Generator's U.S. EPA ID Number – Manifest Document Number

Enter the generator's U.S. EPA twelve digit identification number and the unique five digit number assigned to this Manifest (e.g., 00001) by the generator.

Item 2. Page 1 of –

Enter the total number of pages used to complete this Manifest, i.e., the first page (EPA Form 8700-22) plus the number of Continuation Sheets (EPA Form 8700-22A), if any.

Item 3. Generator's Name and Mailing Address

Enter the name and mailing address of the generator. The address should be the location that will manage the returned Manifest forms.

Item 4. Generator's Phone Number

Enter a telephone number where an authorized agent of the generator may be reached in the event of an emergency.

Item 5. Transporter 1 Company Name

Enter the company name of the first transporter who will transport the waste.

Item 6. U.S. EPA ID Number

Enter the U.S. EPA twelve digit identification number of the first transporter identified in item 5.

Item 7. Transporter 2 Company Name

If applicable, enter the company name of the second transporter who will transport the waste. If more than two transporters are used to transport the waste, use a Continuation Sheet(s) (EPA Form 8700-22A) and list the transporters in the order they will be transporting the waste.

Item 8. U.S. EPA ID Number

If applicable, enter the U.S. EPA twelve digit identification number of the second transporter identified in item 7.

Note.–If more than two transporters are used, enter each additional transporter's company name and U.S. EPA twelve digit identification number in items 24-27 on the Continuation Sheet (EPA Form 8700-22A). Each Continuation Sheet has space to record two additional transporters. Every transporter used between the generator and the designated facility must be listed.

Item 9. Designated Facility Name and Site Address

Enter the company name and site address of the facility designated to receive the waste listed on this Manifest. The address must be the site address, which may differ from the company mailing address.

Item 10. U.S. EPA ID Number

Enter the U.S. EPA twelve digit identification number of the designated facility identified in item 9.

Item 11. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number (UN/NA))

Enter the U.S. DOT Proper Shipping Name, Hazard Class, and ID Number (UN/NA) for each waste as identified in 49 CFR 171 through 177.

Note.–If additional space is needed for waste descriptions, enter these additional descriptions in item 28 on the Continuation Sheet (EPA Form 8700-22A).

Item 12. Containers (No. and Type)

Enter the number of containers for each waste and the appropriate abbreviation from Table I (below) for the type of container.

Table I – Types of Containers

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
TP = Tanks portable	CF = Fiber or plastic boxes, cartons, cases
TT = Cargo tanks (tank trucks)	BA = Burlap, cloth, paper or plastic bags
TC = Tank cars	
DT = Dump truck	

Item 13. Total Quantity

Enter the total quantity of waste described on each line.

Item 14. Unit (Wt./Vol.)

Enter the appropriate abbreviation from Table II (below) for the unit of measure.

Table II – Units of Measure

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. Special Handling Instructions and Additional Information

Generators may use this space to indicate special transportation, treatment, storage, or disposal information or Bill of Lading information. States may not require additional, new, or different information in this space. For international shipments, generators must enter in this space the point of departure (City and State) for those shipments destined for treatment, storage, or disposal outside the jurisdiction of the United States.

Item 16. Generator's Certification

The generator must read, sign (by hand), and date the certification statement. If a mode *other than* highway is used, the word "highway" should be lined out and the appropriate mode (rail, water, or air) inserted in the space below. If another mode *in addition to* the highway mode is used, enter the appropriate additional mode (e.g., *and rail)* in the space below.

Primary exporters shipping hazardous wastes to a facility located outside of the United States must add to the end of the first sentence of the certification the following words "and conforms to the terms of the EPA Acknowledgment of Consent to the shipment."

In signing the waste minimization certification statement, those generators who have not been exempted by statute or regulation from the duty to make a waste minimization *certification under section 3002(b) of RCRA are also certifying that they have complied* with the waste minimization requirements.

Generators may preprint the words. "On behalf of" in the signature block or may hand write this statement on the signature block prior to signing the generator certifications.

Note.–All of the above information *except* the handwritten signature required in item 16 may be preprinted.

TRANSPORTERS

Item 17. Transporter 1 Acknowledgement of Receipt of Materials

Enter the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Item 18. Transporter 2 Acknowledgement of Receipt of Materials

Enter, if applicable, the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Note.–International Shipments – Transporter Responsibilities.

Exports–Transporters must sign and enter the date the waste left the United States in item 15 of Form 8700-22.

Imports–Shipments of hazardous waste regulated by RCRA and transported into the United States from another country must upon entry be accompanied by the U.S. EPA Uniform Hazardous Waste Manifest. Transporters who transport hazardous waste into the United States from another country are responsible for completing the Manifest (40 CFR 263.10(c)(1)).

OWNERS AND OPERATORS OF TREATMENT, STORAGE, OR DISPOSAL FACILITIES

Item 19. Discrepancy Indication Space

The authorized representative of the designated (or alternate) facility's owner or operator must note in this space any significant discrepancy between the waste described on the Manifest and the waste actually received at the facility.

Owners and operators of facilities located in unauthorized States (i.e., the U.S. EPA administers the hazardous waste management program) who cannot resolve significant discrepancies within 15 days of receiving the waste must submit to their Regional Administrator (see list below) a letter with a copy of the Manifest at issue describing the discrepancy and attempts to reconcile it (40 CFR 264.72 and 265.72).

Owners and operators of facilities located in authorized States (i.e., those States that have received authorization from the U.S. EPA to administer the hazardous waste program) should contact their State agency for information on State Discrepancy Report requirements.

EPA Regional Administrators

Regional Administrator, U.S. EPA Region I, J.F. Kennedy Fed. Bldg., Boston, MA 02203

Regional Administrator, U.S. EPA Region II, 26 Federal Plaza, New York, NY 10278

Regional Administrator, U.S. EPA Region III, 6th and Walnut Sts., Philadelphia, PA 19106

Regional Administrator, U.S. EPA Region IV, 345 Courtland St., NE., Atlanta, GA 30365

Regional Administrator, U.S. EPA Region V, 230 S. Dearborn St., Chicago, IL 60604

Regional Administrator, U.S. EPA Region VI, 1201 Elm Street, Dallas, TX 75270

Regional Administrator, U.S. EPA Region VII, 324 East 11th Street, Kansas City, MO 64106

Regional Administrator, U.S. EPA Region VIII, 1860 Lincoln Street, Denver, CO 80295

Regional Administrator, U.S. EPA Region IX, 215 Freemont Street, San Francisco, CA 94105

Regional Administrator, U.S. EPA Region X, 1200 Sixth Avenue, Seattle, WA 98101

Item 20. Facility Owner or Operator: Certification of Receipt of Hazardous Materials Covered by This Manifest Except as Noted in Item 19

Print or type the name of the person accepting the waste on behalf of the owner or operator of the facility. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Items A-K are not required by Federal regulations for intra- or interstate transportation. However, States may require generators and owners or operators of treatment, storage, or disposal facilities to complete some or all of items A-K as part of State manifest reporting requirements. Generators and owners and operators of treatment, storage, or disposal facilities are advised to contact State officials for guidance on *completing the shaded areas of the Manifest.*

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street SW., Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office Management and Budget, Washington, DC 20503.

CWM OF THE NORTHWEST
Federal EPA ID: ORD089452353
17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812

SCHNITZER STEEL PRODUCTS INC
ATTN: MANIFEST SECTION
ORD099155574
12005 N BURGARD ST
PORTLAND OR 97203-6422

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. has received waste material from SCHNITZER STEEL PRODUCTS INC on 07/08/02 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 16351. Chemical Waste Management, Inc., hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of Poly-Chlorinated Biphenyl contaminated materials.

Profile Number: CW1012
CWM Tracking ID: 36373601

Process	CWM Unit	Xfer Date	Site Location	Gen #
818 CONTAINER/LANDFIL	1*0	07/10/02	LANDFILL	SI-62702-1

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

Becky Sumner

LYNN MURRILL
RECORDS MANAGER
Certificate # 98847
07/12/02

COLUMBIA RIDGE LANDFILL & RECYCLING CENTER
A WASTE MANAGEMENT COMPANY

18177 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2030
(541) 454-3312 Fax

September 12, 2002

Envirotech Systems, Inc.
3601 121st St. SW
Lynnwood, WA 98037

CERTIFICATE OF DISPOSAL

Oregon Waste Systems, Inc. has received NON HAZARDOUS Waste material from Schnitzer Steel on behalf of Envirotech Systems, Inc.

Date of Disposal:	September 11, 2002
Manifest #'s:	16918
Profile #:	512978
Pounds Disposed:	800 lbs.
Waste Type:	Mixed Latex Paint

I certify, on behalf of the above listed facility, that to the best of my knowledge the above-described non-hazardous waste was managed in compliance with all applicable laws.

Julie Valdez

Julie Valdez
Special Waste Billing Department

ENSCO

CERTIFICATION NO.
00360879

309 AMERICAN CIRCLE EL DORADO, AR 71730 (870) 863-7173

INVOICE NO.
386037

CERTIFICATE OF TREATMENT/DISPOSAL

ENVIROTECH SYSTEMS, INC.
ATTN: MIKE JEFFERS
3601 121ST STREET SW
LYNNWOOD, WA 98037

RECEIVED
AUG 29 2002
ENVIROTECH SYSTEMS, INC.

SCHNITZER STEEL
ATTN: TIM TODD
12005 N. BURGARD
PORTLAND, OR 97203

ENSCO CERTIFIES THAT THE ITEMS ASSOCIATED WITH THE SHIPMENT IDENTIFIED BY MANIFEST AR001218159, MD# 12447 RECEIVED FROM SCHNITZER STEEL HAVE BEEN PROCESSED AS DESCRIBED BELOW:

SEQ #	DESCRIPTION	TREATMENT DATES	TREATMENT DISPOSAL METHOD
001	CORR LQ	06/15/01-06/15/01	INCINERATION
002	HAZ SOLID	08/20/02-08/20/02	INCINERATION

UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S.C. 1001 AND 15 U.S.C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE, AND COMPLETE. AS TO THE IDENTIFIED SECTION(S) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

IF YOU HAVE ANY QUESTIONS REGARDING THIS CERTIFICATE OF TREATMENT/DISPOSAL, PLEASE CONTACT YOUR ENSCO SALES REPRESENTATIVE.

NAME LYNN MUCKELRATH

TITLE INVENTORY TRACKING SPECIALIST

DATE 8/21/02

WORK ORDER

ENVIROTECH SYSTEMS, INC.
3601 121st STREET SW
LYNNWOOD, WA 98037
(206) 363-9000

FOR ACCOUNT

WORK ORDER NUMBER
16351

WORK ORDER DATE
Jun 26, 2002

Page
1

SOLD TO:
SCHNITZER STEEL
P.O. BOX 10047
PORTLAND, OR 97296

PHONE:

SITE:
SCHNITZER STEEL
12005 N. BURGARD STREET
PORTLAND, OR 97203

SITE
PHONE:

CUSTOMER	PO NUMBER	ESI JOB #	ACCOUNT REP
SCHSTEPOR2		02-151-15	
CUSTOMER CONTACT	EPA ID #	DATE ORDERED	DATE COMPLETED
J.JAKUBIAK		6/26/02	7/2/02

DESCRIPTION / MANIFEST #	QUANTITY	SIZE	TAX	UNIT PRICE	EXTENSION
REMOVE, TRANSPORT AND REUSE/RECYCLE/DISPOSE OF:					
DM PCB BALLASTS/ 16351	✓ 1.00	16 GAL	N		
PROFILE FACILITY APPROVAL OF PCB BALL. 02-151-15-01	1.00				
BOX WASTE FLAMMABLE LIQUID/ 16352	1.00	10 GAL	N		ON ACCOUNT
PROFILE FACILITY APPROVAL OF FLAMM.LIQ. 02-151-15-05	1.00				
DM LEAD ACID BATTERIES FOR RECYCLE/ 16353	✓ 1.00	~~5 GAL~~ 5 GAL	N		
PROFILE FACILITY APPROVAL OF BATTERIES 02-151-15-04	1.00				
DM NICAD BATTERIES/ 16353	✓ 1.00	5 GAL	N		
PROFILE FACILITY APPROVAL OF BATTERIES 02-151-15-02	1.00				
DM ~~LITHIUM BATTERIES~~/ 16353 (ALKALINE)	✓ 1.00	16 GAL	N		
PROFILE FACILITY APPROVAL OF BATTERIES 02-151-15-03	1.00				
4G BOX - COPACK LAB PK	1.00	10 GAL	Y		
UN1A2 NEW DRUM	2 ~~1.00~~	16 GAL	Y		
UN1A2 NEW DRUM	2 ~~1.00~~	~~30 GAL~~ (5 GAL)			
VERMICULITE	1/2	BAGS	Y		

CUSTOMER CHANGES

WORK AUTHORIZATION

The undersigned hereby authorizes and awknowledges receipt of the materials and /or commencement of services described above on behalf the party indicated as "SOLD TO" above (Generator). On behalf of Generator, I hereby make and appoint Envirotech Systems, Inc. Generator's true and lawful agent for the purpose of managing the above waste responsibilities. I understand that this does not relieve Generator of its responsibilities as a generator even though title of the waste transfers to Envirotech Systems, Inc.. Prices quoted herein are subject to the was inspection and acceptance at the destination waste management facility.

BY: James L Jakubiak DATE: 7/2/02

SCHN00246702

Emergency Contact Telephone Number
(206) 363-9000 OR (425) 771-0452

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. ORD099155574	Manifest Document No. 16351	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
SCHNITZER ~~INVESTMENT CORP.~~ STEEL
P.O. BOX 10047
PORTLAND, OR 97296-0047

SITE ADDRESS:
SCHNITZER STEEL
12005 N. BURGARD ST.
PORTLAND, OR 97203
ATTN: JIM JAKUBIAK

4. Generator's Phone (503) 286-6976

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC.
6. US EPA ID Number: WAH000012450
C. State Transporter's ID
D. Transporter's Phone: (206) 363-9000

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT OF THE NW
17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812
10. US EPA ID Number: ORD089452353
G. State Facility's ID
H. Facility's Phone: (541) 454-2043

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a.	RQ	ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S. 9 NA3077 PG III RQ (PCB) (POLYCHLORINATED BIPHENYLS)	001	DM	00055	K	X [illegible]
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
A CWM#CW1012, ES# 02-151-15-01, ERG# 171

K. Handling Codes for Wastes Listed Above
CERTIFICATE OF DISPOSAL REQUIRED

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: James L. Jakubiak
Signature: [signature]
Month 01 Day 02 Year 02

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: SCOTT R. LINDSAY
Signature: [signature]
Month 07 Day 02 Year 02

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name
Signature
Month Day Year

GENERATOR'S COPY

SCHN00246703

UNIFORM HAZARDOUS WASTE MANIFEST AND INSTRUCTIONS EPA FORM 8700-22

U.S. EPA Form 8700-22

Read all instructions before completing this form.

This form has been designed for use on a 12-pitch (elite) typewriter; a firm point pen may also be used – press down hard.

Federal regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation.

Federal regulations also require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage and disposal facilities to complete the following information:

GENERATORS

Item 1. Generator's U.S. EPA ID Number – Manifest Document Number

Enter the generator's U.S. EPA twelve digit identification number and the unique five-digit number assigned to this Manifest (e.g. 00001) by the generator.

Item 2. Page 1 of –

Enter the total number of pages used to complete this Manifest, i.e., the first page (EPA Form 8700-22) plus the number of Continuation Sheets (EPA Form 8700-22A), if any.

Item 3. Generator's Name and Mailing Address

Enter the name and mailing address of the generator. The address should be the location that will manage the returned Manifest forms.

Item 4. Generator's Phone Number

Enter a telephone number where an authorized agent of the generator may be reached in the event of an emergency.

Item 5. Transporter 1 Company Name

Enter the company name of the first transporter who will transport the waste.

Item 6. U.S. EPA ID Number

Enter the U.S. EPA twelve digit identification number of the first transporter identified in Item 5.

Item 7. Transporter 2 Company Name

If applicable, enter the company name of the second transporter who will transport the waste. If more than two transporters are used to transport the waste, use a Continuation Sheet(s) (EPA Form 8700-22A) and list the transporters in the order they will be transporting the waste.

Item 8. U.S. EPA ID Number

If applicable, enter the U.S. EPA twelve digit identification number of the second transporter identified in item 7.

Note.–If more than two transporters are used, enter each additional transporter's company name and U.S. EPA twelve digit identification number in items 24-27 on the Continuation Sheet (EPA Form 8700-22A). Each Continuation Sheet has space to record two additional transporters. Every transporter used between the generator and the designated facility must be listed.

Item 9. Designated Facility Name and Site Address

Enter the company name and site address of the facility designated to receive the waste listed on this Manifest. The address must be the site address, which may differ from the company mailing address.

Item 10. U.S. EPA ID Number

Enter the U.S. EPA twelve digit identification number of the designated facility identified in item 9.

Item 11. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number (UN/NA))

Enter the U.S. DOT Proper Shipping Name, Hazard Class, and ID Number (UN/NA) for each waste as identified in 49 CFR 171 through 177.

Note.–If additional space is needed for waste descriptions, enter these additional descriptions in item 28 on the Continuation Sheet (EPA Form 8700-22A).

Item 12. Containers (No. and Type)

Enter the number of containers for each waste and the appropriate abbreviation from table I (below) for the type of container.

Table I – Types of Containers

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
TP = Tanks portable	CF = Fiber or plastic boxes, cartons, cases
TT = Cargo tanks (tank trucks)	
TC = Tank cars	BA = Burlap, cloth, paper or plastic bags
DT = Dump truck	

Item 13. Total Quantity

Enter the total quantity of waste described on each line.

Item 14. Unit (Wt./Vol.)

Enter the appropriate abbreviation from Table II (below) for the unit of measure.

Table II – Units of Measure

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. Special Handling Instructions and Additional Information

Generators may use this space to indicate special transportation, treatment, storage, or disposal information or Bill of Lading information. States may not require additional, new, or different information in this space. For international shipments, generators must enter in this space the point of departure (City and State) for those shipments destined for treatment, storage, or disposal outside the jurisdiction of the United States.

Item 16. Generator's Certification

The generator must read, sign (by hand), and date the certification statement. If a mode *other than* highway is used, the word "highway" should be lined out and the appropriate mode (rail, water, or air) inserted in the space below. If another mode *in addition to* the highway mode is used, enter the appropriate additional mode (e.g., *and rail*) in the space below.

Primary exporters shipping hazardous wastes to a facility located outside of the United States must add to the end of the first sentence of the certification the following words "and conforms to the terms of the EPA Acknowledgment of Consent to the shipment."

In signing the waste minimization certification statement, those generators who have not been exempted by statute or regulation from the duty to make a waste minimization certification under section 3002(b) of RCRA are also certifying that they have complied with the waste minimization requirements.

Generators may preprint the words, "On behalf of" in the signature block or may hand write this statement on the signature block prior to signing the generator certifications.

Note.–All of the above information *except* the handwritten signature required in item 16 may be preprinted.

TRANSPORTERS

Item 17. Transporter 1 Acknowledgement of Receipt of Materials

Enter the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Item 18. Transporter 2 Acknowledgement of Receipt of Materials

Enter, if applicable, the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Note.–International Shipments – Transporter Responsibilities.

Exports–Transporters must sign and enter the date the waste left the United States in item 15 of Form 8700-22.

Imports–Shipments of hazardous waste regulated by RCRA and transported into the United States from another country must upon entry be accompanied by the U.S. EPA Uniform Hazardous Waste Manifest. Transporters who transport hazardous waste into the United States from another country are responsible for completing the Manifest (40 CFR 263.10(c)(1)).

OWNERS AND OPERATORS OF TREATMENT, STORAGE, OR DISPOSAL FACILITIES

Item 19. Discrepancy Indication Space

The authorized representative of the designated (or alternate) facility's owner or operator must note in this space any significant discrepancy between the waste described on the Manifest and the waste actually received at the facility.

Owners and operators of facilities located in unauthorized States (i.e., the U.S. EPA administers the hazardous waste management program) who cannot resolve significant discrepancies within 15 days of receiving the waste must submit to their Regional Administrator (see list below) a letter with a copy of the Manifest at issue describing the discrepancy and attempts to reconcile it (40 CFR 264.72 and 265.72).

Owners and operators of facilities located in authorized States (i.e., those States that have received authorization from the U.S. EPA to administer the hazardous waste program) should contact their State agency for information on State Discrepancy Report requirements.

EPA Regional Administrators

Regional Administrator, U.S. EPA Region I, J.F. Kennedy Fed. Bldg., Boston, MA 02203

Regional Administrator, U.S. EPA Region II, 26 Federal Plaza, New York, NY 10278

Regional Administrator, U.S. EPA Region III, 6th and Walnut Sts., Philadelphia, PA 19106

Regional Administrator, U.S. EPA Region IV, 345 Courtland St., NE, Atlanta, GA 30365

Regional Administrator, U.S. EPA Region V, 230 S. Dearborn St., Chicago, IL 60604

Regional Administrator, U.S. EPA Region VI, 1201 Elm Street, Dallas, TX 75270

Regional Administrator, U.S. EPA Region VII, 324 East 11th Street, Kansas City, MO 64106

Regional Administrator, U.S. EPA Region VIII, 1860 Lincoln Street, Denver, CO 80295

Regional Administrator, U.S. EPA Region IX, 215 Freemont Street, San Francisco, CA 94105

Regional Administrator, U.S. EPA Region X, 1200 Sixth Avenue, Seattle, WA 98101

Item 20. Facility Owner or Operator: Certification of Receipt of Hazardous Materials Covered by This Manifest Except as Noted in Item 19

Print or type the name of the person accepting the waste on behalf of the owner or operator of the facility. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Items A-K are not required by Federal regulations for intra- or interstate transportation. However, States may require generators and owners or operators of treatment, storage, or disposal facilities to complete some or all of items A-K as part of State manifest reporting requirements. Generators and owners and operators of treatment, storage, or disposal facilities are advised to contact State officials for guidance on completing the shaded areas of the Manifest.

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office Management and Budget, Washington, DC 20503.

ENVIROTECH SYSTEMS, INC.
3601 - 121st STREET SW
LYNNWOOD, WA 98037
TELEPHONE: (206) 363-9000 FAX: (425) 513-5839

WASTE PRODUCT QUESTIONNAIRE

PROFILE ESI WPQ 02-151-15-01

GENERATOR NAME: SCHNITZER STEEL
SITE ADDRESS: 12005 N. BURGARD ST.
PORTLAND, OR 97203

INVOICE TO: SCHNITZER STEEL
ADDRESS: P.O. BOX 10047
PORTLAND, OR 97296-

DATE: 6/6/02
SIC CODE:
GEN EPA ID: ORD099155574
CONTACT: JIM JAKUBIAK
PHONE: 503-286-6976

WASTE PRODUCT DESCRIPTION AND CHARACTERISTICS

WASTE PRODUCT NAME: PCB BALLASTS
PROCESS GENERATING WASTE: CHANGE OUT
SOURCE:
FORM:

ODOR
(●) NONE ( ) MILD ( ) STRONG
DESCRIBE:

COLOR AND CLARITY
COLOR: NA
CLARITY: OPAQUE

PHYSICAL STATE AT 70F
(●) SOLID ( ) SLUDGE
( ) LIQUID ( ) POWDER
AVERAGE CONSISTENCY: BALLASTS

TOXIC CATEGORIES PRESENT
WDOECONC:
WEIGHT:
TOXICCAT:

LAYERS
( ) MULTI-LAYERED
( ) BI-LAYERED
(●) HOMOGENOUS
FREE LIQUIDS: 0%

pH
( ) <= 2 ( ) 10.1 - 12.4
( ) 2 - 4 ( ) >= 12.5
( ) 4.1 - 10 ( ) EXACT: na

DENSITY OR SPECIFIC GRAVITY
BALLASTS
( ) LIQUID lbs/gal
( ) SOLID lbs/ft3

FLASH POINT
( ) < 73 F ( ) > 200 F ☐ CC ☐ EPA
( ) 73 - 141 F (●) NO FLASH ☐ OC ☐ DOT
( ) 142 - 199 F ( ) EXACT:

CONSTITUENTS
CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL)

	%
PCB BALLASTS	100
NON-LEAKING	
OSD 5/23/02	

CHEMICAL NATURE
( ) I
( ) O
(●) I/O

METALS (PPM)
(●) TOTAL ( ) EPA TCLP
( ) GEN KNOWLEDGE

ARSENIC (As)	NS
BARIUM (Ba)	NS
CADMIUM (Cd)	NS
CHROMIUM (Cr)	NS
COPPER (Cu)	NS
LEAD (Pb)	NS
MERCURY (Hg)	NS
NICKEL (Ni)	NS
SELENIUM (Se)	NS
SILVER (Ag)	NS
ZINC (Zn)	NS
HEXCHROME	NS
OTHER	

GENERATOR HAS PROVIDED THE FOLLOWING
☐ SAMPLE ☑ MSDS ☐ WASTE ANALYSIS

SHIPPING INSTRUCTIONS
IS THIS A DOT HAZARDOUS MATERIAL
(●) YES
( ) NO

DOT RQ	RQ	1 lbs.
BULK LIQUID:		☐
BULK SOLID:		☐
DRUM/CONTAINER TYPE:		
UN1A2 16 GAL DM		
VOLUME:		
1 DRUM		

RCRA HAZ WASTE ☐ EXEMPT WASTE ☐
STATE ONLY WASTE ☐ TSCA ☑

WASHINGTON STATE DESIGNATION
( ) EHW ( ) EXEMPT ( ) DW

WASTE CODES
US EPA WASTE CODE
WA DOE WASTE CODES
CA WASTE CODES
OR WASTE CODES X002
SUBJECT TO LAND DISPOSAL RESTRICTIONS ☐

US DOT DESCRIPTION

PROPER SHIPPING NAME: RQ, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, N.O.S., (PCB)
ADDITIONAL DESCRIPTION: (POLYCHLORINATED BIPHENYLS)
HAZARD CLASS: 9 DOT ID NUMBER: NA3077 PACKING GROUP NUMBER: PG III

GENERATOR CERTIFICATION STATEMENT

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS DOCUMENT AND THOSE ATTACHED HERETO ARE TRUE AND CORRECT. ALL WASTE TENDERED UNDER THIS WASTE PROFILE SHALL CONFORM TO THE SPECIFICATIONS ABOVE. TO THE BEST OF MY KNOWLEDGE, ALL KNOWN AND SUSPECTED HAZARDOUS COMPONENTS (40 CFR 261 .268) OF THIS WASTE STREAM HAVE BEEN IDENTIFIED ABOVE.

SIGNATURE X TITLE DATE

THE UNDERSIGNED CERTIFIES THAT HE/SHE OBTAINED A REPRESENTATIVE SAMPLE OF THE WASTE MATERIAL DESCRIBED ABOVE, AND THAT THE FOLLOWING REPRESENTATIONS ARE TRUE AND CORRECT.

SAMPLING METHOD: SAMPLE QUANTITY: NAME: MIKE JEFFERS
SOURCE OF MATERIAL SAMPLED: DATE:

Emergency Contact Telephone Number

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. ORD009155574	Manifest Document No. 10352	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
SCHNITZER STEEL
P.O. BOX 10047
PORTLAND, OR 97296

SITE ADDRESS: SCHNITZER STEEL
12005 N. BURGARD ST.
PORTLAND, OR 97203
ATTN TIM TODDU JAKUB

4. Generator's Phone (503 285-6944

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC.
6. US EPA ID Number: WAH000012450
C. State Transporter's ID
D. Transporter's Phone: (206) 383-9000

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
BURLINGTON ENVIRONMENTAL, INC.
20245 77TH AVE. SOUTH
KENT, WA 98032
10. US EPA ID Number: WAD991281767
G. State Facility's ID
H. Facility's Phone: 2530728030

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.		WASTE FLAMMABLE LIQUIDS, N.O.S. 3 UN1993 PGII	001	CF	00020	P	D001
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
[illegible]

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

EMERGENCY INFORMATION CONTACT (206) 383-9000 OR (425) 771-0452.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
James L. Jakubek	[signature]	07	02	02

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
SCOTT R. LINDSAY	[signature]	07	02	02

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

GENERATOR'S COPY

SCHN00246706

UNIFORM HAZARDOUS WASTE MANIFEST AND INSTRUCTIONS EPA FORM 8700-22

U.S. EPA Form 8700-22

Read all instructions before completing this form.

This form has been designed for use on a 12-pitch (elite) typewriter; a firm point pen may also be used – press down hard.

Federal regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation.

Federal regulations also require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage and disposal facilities to complete the following information:

GENERATORS

Item 1. Generator's U.S. EPA ID Number – Manifest Document Number

Enter the generator's U.S. EPA twelve digit identification number and the unique five digit number assigned to this Manifest (e.g., 00001) by the generator.

Item 2. Page 1 of –

Enter the total number of pages used to complete this Manifest, i.e., the first page (EPA Form 8700-22) plus the number of Continuation Sheets (EPA Form 8700-22A), if any.

Item 3. Generator's Name and Mailing Address

Enter the name and mailing address of the generator. The address should be the location that will manage the returned Manifest forms.

Item 4. Generator's Phone Number

Enter a telephone number where an authorized agent of the generator may be reached in the event of an emergency.

Item 5. Transporter 1 Company Name

Enter the company name of the first transporter who will transport the waste.

Item 6. U.S. EPA ID Number

Enter the U.S. EPA twelve digit identification number of the first transporter identified in item 5.

Item 7. Transporter 2 Company Name

If applicable, enter the company name of the second transporter who will transport the waste. If more than two transporters are used to transport the waste, use a Continuation Sheet(s) (EPA Form 8700-22A) and list the transporters in the order they will be transporting the waste.

Item 8. U.S. EPA ID Number

If applicable, enter the U.S. EPA twelve digit identification number of the second transporter identified in item 7.

Note.–If more than two transporters are used, enter each additional transporter's company name and U.S. EPA twelve digit identification number in items 24-27 on the Continuation Sheet (EPA Form 8700-22A). Each Continuation Sheet has space to record two additional transporters. Every transporter used between the generator and the designated facility must be listed.

Item 9. Designated Facility Name and Site Address

Enter the company name and site address of the facility designated to receive the waste listed on this Manifest. The address must be the site address, which may differ from the company mailing address.

Item 10. U.S. EPA ID Number

Enter the U.S. EPA twelve digit identification number of the designated facility identified in item 9.

Item 11. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number (UN/NA))

Enter the U.S. DOT Proper Shipping Name, Hazard Class, and ID Number (UN/NA) for each waste as identified in 49 CFR 171 through 177.

Note.–If additional space is needed for waste descriptions, enter these additional descriptions in item 28 on the Continuation Sheet (EPA Form 8700-22A).

Item 12. Containers (No. and Type)

Enter the number of containers for each waste and the appropriate abbreviation from Table I (below) for the type of container.

Table I – Types of Containers

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
TP = Tanks portable	CF = Fiber or plastic boxes, cartons, cases
TT = Cargo tanks (tank trucks)	BA = Burlap, cloth, paper or plastic bags
TC = Tank cars	
DT = Dump truck	

Item 13. Total Quantity

Enter the total quantity of waste described on each line.

Item 14. Unit (Wt./Vol.)

Enter the appropriate abbreviation from Table II (below) for the unit of measure.

Table II – Units of Measure

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

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Generators may use this space to indicate special transportation, treatment, storage, or disposal information or Bill-of-Lading information. States may not require additional, new, or different information in this space. For international shipments, generators must enter in this space the point of departure (City and State) for those shipments destined for treatment, storage, or disposal outside the jurisdiction of the United States.

Item 16. Generator's Certification

The generator must read, sign (by hand), and date the certification statement. If a mode *other than* highway is used, the word "highway" should be lined out and the appropriate mode (rail, water, or air) inserted in the space below. If another mode *in addition to* the highway mode is used, enter the appropriate additional mode (e.g., *and rail*) in the space below.

Primary exporters shipping hazardous wastes to a facility located outside of the United States must add to the end of the first sentence of the certification the following words: "and conforms to the terms of the EPA Acknowledgment of Consent to the shipment."

In signing the waste minimization certification statement, those generators who have not been exempted by statute or regulation from the duty to make a waste minimization certification under section 3002(b) of RCRA are also certifying that they have complied with the waste minimization requirements.

Generators may preprint the words "On behalf of" in the signature block or may hand write this statement on the signature block prior to signing the generator certifications.

Note.–*All of the above information except the handwritten signature required in Item 16 may be preprinted.*

TRANSPORTERS

Item 17. Transporter 1 Acknowledgement of Receipt of Materials

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Note.–International Shipments – Transporter Responsibilities.

Exports–Transporters must sign and enter the date the waste left the United States in item 15 of Form 8700-22.

Imports–Shipments of hazardous waste regulated by RCRA and transported into the United States from another country must upon entry be accompanied by the U.S. EPA Uniform Hazardous Waste Manifest. Transporters who transport hazardous waste into the United States from another country are responsible for completing the Manifest (40 CFR 263.10(c)(1)).

OWNERS AND OPERATORS OF TREATMENT, STORAGE, OR DISPOSAL FACILITIES

Item 19. Discrepancy Indication Space

The authorized representative of the designated (or alternate) facility's owner or operator must note in this space any significant discrepancy between the waste described on the Manifest and the waste actually received at the facility.

Owners and operators of facilities located in unauthorized States (i.e., the U.S. EPA administers the hazardous waste management program) who cannot resolve significant discrepancies within 15 days of receiving the waste must submit to their Regional Administrator (see list below) a letter with a copy of the Manifest at issue describing the discrepancy and attempts to reconcile it (40 CFR 264.72 and 265.72).

Owners and operators of facilities located in authorized States (i.e., those States that have received authorization from the U.S. EPA to administer the hazardous waste program) should contact their State agency for information on State Discrepancy Report requirements.

EPA Regional Administrators:

Regional Administrator, U.S. EPA Region I, J.F. Kennedy Fed. Bldg., Boston, MA 02203

Regional Administrator, U.S. EPA Region II, 26 Federal Plaza, New York, NY 10278

Regional Administrator, U.S. EPA Region III, 6th and Walnut Sts., Philadelphia, PA 19106

Regional Administrator, U.S. EPA Region IV, 345 Courtland St., NE, Atlanta, GA 30365

Regional Administrator, U.S. EPA Region V, 230 S. Dearborn St., Chicago, IL 60604

Regional Administrator, U.S. EPA Region VI, 1201 Elm Street, Dallas, TX 75270

Regional Administrator, U.S. EPA Region VII, 324 East 11th Street, Kansas City, MO 64106

Regional Administrator, U.S. EPA Region VIII, 1860 Lincoln Street, Denver, CO 80295

Regional Administrator, U.S. EPA Region IX, 215 Freemont Street, San Francisco, CA 94105

Regional Administrator, U.S. EPA Region X, 1200 Sixth Avenue, Seattle, WA 98101

Item 20. Facility Owner or Operator: Certification of Receipt of Hazardous Materials Covered by This Manifest Except as Noted in Item 19

Print or type the name of the person accepting the waste on behalf of the owner or operator of the facility. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Items A-K are not required by Federal regulations for intra- or interstate transportation. However, States may require generators and owners or operators of treatment, storage, or disposal facilities to complete some or all of items A-K as part of State manifest reporting requirements. Generators and owners and operators of treatment, storage, or disposal facilities are advised to contact State officials for guidance on completing the shaded areas of the Manifest.

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office Management and Budget, Washington, DC 20503.

SCHN00246707

Burlington Environmental Inc.

RCRA Land Disposal Restriction Notification Form EZ

This form is applicable to characteristic wastes (D codes), listed wastes (F, K, U and P codes), California List Wastes, and Hazardous Debris.

Generator: SCHNITZER STEEL

U.S. EPA I.D. #: OHD 099155574

Burlington Profile #: E75130-00

Manifest #: 16352

The wastes identified on this form are subject to the land disposal restrictions of 40 CFR Part 268. The wastes do not meet the treatment standards specified in Part 268, Subpart D or do not meet the applicable prohibition levels specified in 268.32 or RCRA Section 3004(d). Pursuant to 40 CFR 268.7(a), the required information applicable to each waste is identified below (check all boxes that apply):

Treatability Group: ☐ Wastewater ☒ Nonwastewater

(Wastewaters contain less than 1% filterable solids and less than 1% Total Organic Carbon)

- ☐ D001 Ignitable (except for High TOC) managed in non-CWA/non-CWA-equivalent/non Class I SDWA systems
  (If this box is checked, complete and attach Form UC to address underlying hazardous constituents)
- ☒ D001 Ignitable (except for High TOC) managed in CWA/ CWA-equivalent/Class I SDWA systems
- ☐ D001 High TOC Ignitable (greater than 10% total organic carbon)
- ☐ D002 Corrosive managed in non-CWA/non-CWA-equivalent/non Class I SDWA systems
  (If this box is checked, complete and attach Form UC to address underlying hazardous constituents)
- ☐ D002 Corrosive managed in CWA/ CWA-equivalent/Class I SDWA systems
- ☐ D003 Reactive Sulfides based on 261.23(a)(5)
- ☐ D003 Reactive Cyanides based on 261.23(a)(5)
- ☐ D003 Water Reactives based on 261.23(a)(2),(3) and (4)
- ☐ D003 Explosives based on 261.23(a)(6),(7) and (8)
- ☐ D003 Other Reactives based on 261.23(a)(1)
- ☐ D004 Arsenic ☐ D005 Barium ☐ D006 Cadmium ☐ D006 Cadmium-containing batteries
- ☐ D007 Chromium ☐ D008 Lead ☐ D008 Lead acid batteries
- ☐ D009 High mercury inorganic (>260 mg/kg total), including incinerator residue and residues from RMERC
- ☐ D009 High-mercury organic (>260 mg/kg total), not including incinerator residue
- ☐ D009 Low-mercury (<260 mg/kg total) ☐ D009 All D009 wastewaters
- ☐ D010 Selenium ☐ D011 Silver

If D012-43 boxes are checked, complete and attach Form UC to address underlying hazardous constituents (unless these wastes are to be managed in CWA/CWA-equivalent/Class I SDWA systems):

☐ D012 Endrin	☐ D023 *o*-Cresol	☐ D033 Hexachlorobutadiene
☐ D013 Lindane	☐ D024 *m*-Cresol	☐ D034 Hexachloroethane
☐ D014 Methoxychlor	☐ D025 *p*-Cresol	☐ D035 Methyl ethyl ketone
☐ D015 Toxaphene	☐ D026 Cresols (Total)	☐ D036 Nitrobenzene
☐ D016 2,4-D	☐ D027 *p*-Dichlorobenzene	☐ D037 Pentachlorophenol
☐ D017 2,4,5-TP (Silvex)	☐ D028 1,2-Dichloroethane	☐ D038 Pyridine
☐ D018 Benzene	☐ D029 1,1-Dichloroethylene	☐ D039 Tetrachloroethylene
☐ D019 Carbon tetrachloride	☐ D030 2,4-Dinitrotoluene	☐ D040 Trichloroethylene
☐ D020 Chlordane	☐ D031 Heptachlor	☐ D041 2,4,5-Trichlorophenol
☐ D021 Chlorobenzene	☐ D032 Hexachlorobenzene	☐ D042 2,4,6-Trichlorophenol
☐ D022 Chloroform		☐ D043 Vinyl chloride

In addition, the following wastes are included in this shipment:

- ☐ F001-F005 spent solvents. *(If this box is checked, complete the F001-F005 section on the back of this form. Check the hazardous waste number(s) that applies, and identify the constituents likely to be present in the waste.)*
- ☐ F039 multisource leachate. *(If this box is checked, complete and attach Form UC to identify the individual constituents.)*
- ☐ RCRA Section 3004(d) California list wastes. *(If this box is checked, complete the California List section on the back page of this form.)*
- ☐ Hazardous Debris *(If this box is checked, complete the Hazardous Debris section on the back page of this form.)*

If this shipment carries additional waste codes that are not addressed above, identify them here:

EPA Waste Code	Subcategory (if applicable)	EPA Waste Code	Subcategory (if applicable)

Form EZ Revised 12/94

SCHN00246708

ENVIROTECH SYSTEMS INC.

CHEMICAL INVENTORY

PAGE ___OF___

GENERATOR: SCHNITZER
EPA ID#: ORD099155574
LOCATION: PORTLAND, OR
CHEMIST: DALE MYERS
DATE:

LABPACK DRUM INVENTORY? Y N
DRUM NUMBER: SS-L01
PROFILE NO.:ETSI3D-00
DOT CONTAINER: 4G-10 BOX GAL./BOX
DOT PROPER SHIPPING NAME/NAMES: WASTE FLAMMABLE LIQUIDS NOS
HAZ. CLASS: 3 UN/NA: UN1993 PG: II
WASTE WEIGHT: ___lbs.
GROSS WEIGHT: ___lbs.
HAZ. CLASS: ___ UN/NA: ___ PG: ___
WA STATE WASTE CODE AND DESIGNATION: WL01 / WL02 DW / EHW
HAZ. CLASS: ___ UN/NA: ___ PG: ___
M = metal, G = glass, P = plastic, CB = cardboard
RECEIVING STATE WASTE CODES: D001
Gal. = gallon, QT = quart, PT = pint, L = liter, ml = milliliter, lb or # = pound, oz = once, g = gram, mg = milligram

ITEM #	DESCRIPTION (CHEMICAL & PHYSICAL)	WASTE CODES: RCRA & STATE	HAZARD CLASS	PKG GRP	PHYS. STATE	QTY	CONTAINER SIZE	TYPE	WASTE AMOUNT	RQ AMOUNT
1	DEVGUARD 4308 GLOSS ENAMEL	D001	3	II	L	2	1 GAL	M	2 GAL	
	(ETHYLBENZENE,TOLUENE,PRTROLEUM									
	DISTILLATES)									
2	SHERWIL WILLIAMS KEM V 70 ACRYLIC HARDNER	D001	3	II	L	1	1 GAL	M	1 GAL	
	(ETHYLBENZENE, XYLENES, DIMETHYLBENZENE, XYLOL,									
	AROMATIC HYDROCARBONS, SOLVENT NAPHTHA, 135-TRIMETHYLBENZENE)									

SCHN00246709

ENVIROTECH SYSTEMS, INC.
3601 - 121st STREET SW
LYNNWOOD, WA 98037
TELEPHONE: (206) 363-9000 FAX: (425) 513-5839

WASTE PRODUCT QUESTIONNAIRE

PROFILE ESI WPQ 02-151-15-05

GENERATOR NAME: SCHNITZER STEEL
SITE ADDRESS: 12005 N. BURGARD ST.
PORTLAND , OR 97203

INVOICE TO: SCHNITZER STEEL
ADDRESS: P.O. BOX 10047
PORTLAND , OR 97296-

DATE: 6/6/02
SIC CODE:
GEN EPA ID: ORD099155574
CONTACT: JIM JAKUBIAK
PHONE: 503-286-6976

WASTE PRODUCT DESCRIPTION AND CHARACTERISTICS

WASTE PRODUCT NAME: LAB PACK
PROCESS GENERATING WASTE: DISCARDING UNWANTED CHEMICALS
SOURCE:
FORM:

ODOR
○ NONE ◉ MILD ○ STRONG
DESCRIBE:

COLOR AND CLARITY
COLOR:
CLARITY:

PHYSICAL STATE AT 70F
○ SOLID ○ SLUDGE
◉ LIQUID ○ POWDER
AVERAGE CONSISTENCY:

TOXIC CATEGORIES PRESENT
WDOECONC:
WEIGHT:
TOXICCAT:

LAYERS
○ MULTI-LAYERED
○ BI-LAYERED
◉ HOMOGENOUS
FREE LIQUIDS:

pH
○ <= 2 ○ 10.1 - 12.4
○ 2 - 4 ○ >= 12.5
◉ 4.1 - 10 ○ EXACT:

DENSITY OR SPECIFIC GRAVITY
◉ LIQUID lbs/gal
○ SOLID lbs/ft3

FLASH POINT
○ < 73 F ○ > 200 F ☐ CC ☐ EPA
○ 73 - 141 F ◉ NO FLASH ☐ OC ☐ DOT
○ 142 - 199 F ○ EXACT:

CONSTITUENTS
CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL) %

LAB PACK SEE LAB PACK
INVENTORY SHEET

CHEMICAL NATURE
○ I
○ O
◉ I/O

METALS (PPM)
○ TOTAL ○ EPA TCLP
◉ GEN KNOWLEDGE

ARSENIC (As)	NS
BARIUM (Ba)	NS
CADMIUM (Cd)	NS
CHROMIUM (Cr)	NS
COPPER (Cu)	NS
LEAD (Pb)	NS
MERCURY (Hg)	NS
NICKEL (Ni)	NS
SELENIUM (Se)	NS
SILVER (Ag)	NS
ZINC (Zn)	NS
HEXCHROME	NS
OTHER	

GENERATOR HAS PROVIDED THE FOLLOWING
☐ SAMPLE ☐ MSDS ☐ WASTE ANALYSIS

SHIPPING INSTRUCTIONS
IS THIS A DOT HAZARDOUS MATERIAL
◉ YES
○ NO

DOT RQ
BULK LIQUID: ☐
BULK SOLID: ☐
DRUM/CONTAINER TYPE: UN4G-10 GAL BOX
VOLUME: 3 X 1 GALLON

RCRA HAZ WASTE ☑ EXEMPT WASTE ☐
STATE ONLY WASTE ☐ TSCA ☐

WASHINGTON STATE DESIGNATION
○ EHW ○ EXEMPT ◉ DW

WASTE CODES
US EPA WASTE CODE D001
WA DOE WASTE CODES
CA WASTE CODES
OR WASTE CODES
SUBJECT TO LAND DISPOSAL RESTRICTIONS ☐

US DOT DESCRIPTION

PROPER SHIPPING NAME: , WASTE FLAMMABLE LIQUIDS NOS
ADDITIONAL DESCRIPTION: LAB PACK SEE LAB PACK INVENTORY SHEET
HAZARD CLASS: 3 DOT ID NUMBER: UN1993 PACKING GROUP NUMBER: PG II

GENERATOR CERTIFICATION STATEMENT

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS DOCUMENT AND THOSE ATTACHED HERETO ARE TRUE AND CORRECT. ALL WASTE TENDERED UNDER THIS WASTE PROFILE SHALL CONFORM TO THE SPECIFICATIONS ABOVE. TO THE BEST OF MY KNOWLEDGE, ALL KNOWN AND SUSPECTED HAZARDOUS COMPONENTS (40 CFR 261 .268) OF THIS WASTE STREAM HAVE BEEN IDENTIFIED ABOVE.

SIGNATURE X TITLE DATE

THE UNDERSIGNED CERTIFIES THAT HE/SHE OBTAINED A REPRESENTATIVE SAMPLE OF THE WASTE MATERIAL DESCRIBED ABOVE, AND THAT THE FOLLOWING REPRESENTATIONS ARE TRUE AND CORRECT.

SAMPLING METHOD: SAMPLE QUANTITY: NAME:
SOURCE OF MATERIAL SAMPLED: DATE:

CONTAINS HAZARDOUS MATERIALS

THIS SHIPPING ORDER must be legibly filled in, in ink, in indelible Pencil, or in Carbon, and retained by the Agent.

Shipper's No.

Carrier's No. 16353

CARRIER: ENVIROTECH SYSTEMS, INC. SCAC Date

TO:		FROM:	
Consignee	INTERSTATE BATTERIES	Shipper	SCHNITZER STEEL
Street	727 134TH SW	Street	12005 N. BURGARD STREET
Destination	EVERETT, WA 98204 Zip	Origin	PORTLAND, OR 97203 Zip

Route: Vehicle Number U.S. DOT Hazmat Reg. No.

No. Shipping Units	HM	Kind of Packages, Description of Articles (IF HAZARDOUS MATERIALS - PROPER SHIPPING NAME)	HAZARD CLASS	I.D. Number	Packing Group	WEIGHT (subject to correction)	RATE
1		BATTERIES,WET,FILLED WITH ~~BATTERIES~~ ACID ~~ERG#154~~	8	UN2794	PGIII		
1		BATTERIES DRY CONTAINING POTASSIUM ~~HYDROXIDE SOLID ERG#154~~ (AL CAOS)	8	UN3028	PGIII		
1		~~BATTERIES DRY CONTAINING POTASSIUM ERG#154~~ ~~LITHIUM BATTERY ERG#138~~ HYDROXIDE SOLID (ALKALINE)	9	~~UN3090~~ UN3028	PGII		

Remit C.O.D. to:
Address:
City: State: Zip:

C.O.D. Amt: $

C. O. D. FEE: Prepaid ☐ Collect ☐ $

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ Per

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. (Signature of Consignor)

FREIGHT CHARGES ☐ PREPAID ☐ COLLECT

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Where the applicable tariff provisions specify a limitation of the carrier's liability (NMFC Item 172), if there is no release or value declaration by the shipper, and the shipper does not declare a value or release the carrier's liability, that liability shall be limited to the extent provided by NMFC Item 172.

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Per

PLACARDS REQUIRED

PLACARDS SUPPLIED ☐ YES ☐ NO - FURNISHED BY CARRIER

DRIVERS SIGNATURE:

SHIPPER: SCHNITZER STEEL
PER: DATE: 7-2-02

CARRIER: ENVIROTECH SYSTEMS, INC.
PER: DATE: 7/2/02

EMERGENCY RESPONSE TELEPHONE NUMBER: (206) 363-9000

Monitored at all times the Hazardous Material is in transportation including storage incidental to transportation (172.604).

CONTAINS HAZARDOUS MATERIALS

CONTAINS HAZARDOUS MATERIALS

CONTAINS HAZARDOUS MATERIALS

SCHN00246711

ENVIROTECH SYSTEMS, INC.
3601 - 121st STREET SW
LYNNWOOD, WA 98037
TELEPHONE: (206) 363-9000 FAX: (425) 513-5839

WASTE PRODUCT QUESTIONNAIRE

PROFILE ESI WPQ 02-151-15-02

GENERATOR NAME: SCHNITZER STEEL
SITE ADDRESS: 12005 N. BURGARD ST.
PORTLAND, OR 97203

INVOICE TO: SCHNITZER STEEL
ADDRESS: P.O. BOX 10047
PORTLAND, OR 97296-

DATE: 6/6/02
SIC CODE:
GEN EPA ID: ORD099155574
CONTACT: JIM JAKUBIAK
PHONE: 503-286-6976

WASTE PRODUCT DESCRIPTION AND CHARACTERISTICS

WASTE PRODUCT NAME: NICAD BATTERIES
PROCESS GENERATING WASTE: DISPOSAL OF USED BATTERIES
SOURCE: A58
FORM: B309

ODOR
(●) NONE ( ) MILD ( ) STRONG
DESCRIBE:

COLOR AND CLARITY
COLOR: VARIES
CLARITY:

PHYSICAL STATE AT 70F
(●) SOLID ( ) SLUDGE
( ) LIQUID ( ) POWDER
AVERAGE CONSISTENCY:

TOXIC CATEGORIES PRESENT
WDOECONC:
WEIGHT:
TOXICCAT:

LAYERS
( ) MULTI-LAYERED
(●) BI-LAYERED
( ) HOMOGENOUS
FREE LIQUIDS: 0%

pH
( ) <= 2 ( ) 10.1 - 12.4
( ) 2 - 4 ( ) >= 12.5
( ) 4.1 - 10 ( ) EXACT: N/A

DENSITY OR SPECIFIC GRAVITY
N/A
( ) LIQUID lbs/gal
(●) SOLID lbs/ft3

FLASH POINT
( ) < 73 F ( ) > 200 F ☐ CC ☐ EPA
( ) 73 - 141 F ( ) NO FLASH ☐ OC ☐ DOT
( ) 142 - 199 F ( ) EXACT: N/A

CONSTITUENTS
CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL)

	%
POTASSIUM HYDROXIDE	2-8
CADMIUM	8-20
NICKLE	15-35
CADMIMUM HYDROXIDE	8-20
NICKLE HYDROXIDE	25-30

CHEMICAL NATURE
( ) I
( ) O
( ) I/O

GENERATOR HAS PROVIDED THE FOLLOWING
☐ SAMPLE ☐ MSDS ☐ WASTE ANALYSIS

METALS (PPM)
( ) TOTAL ( ) EPA TCLP
(●) GEN KNOWLEDGE

ARSENIC (As)	N/A
BARIUM (Ba)	N/A
CADMIUM (Cd)	>5000
CHROMIUM (Cr)	N/A
COPPER (Cu)	N/A
LEAD (Pb)	N/A
MERCURY (Hg)	N/A
NICKEL (Ni)	>5000
SELENIUM (Se)	N/A
SILVER (Ag)	N/A
ZINC (Zn)	N/A
HEXCHROME	N/A
OTHER	N/A

SHIPPING INSTRUCTIONS
IS THIS A DOT HAZARDOUS MATERIAL
(●) YES
( ) NO

DOT RQ
BULK LIQUID: ☐
BULK SOLID: ☐
DRUM/CONTAINER TYPE: UN1H1 5 GAL DF
VOLUME:

RCRA HAZ WASTE ☐ EXEMPT WASTE ☑
STATE ONLY WASTE ☐ TSCA ☐

WASHINGTON STATE DESIGNATION
( ) EHW (●) EXEMPT ( ) DW

WASTE CODES
US EPA WASTE CODE
WA DOE WASTE CODES
CA WASTE CODES
OR WASTE CODES
SUBJECT TO LAND DISPOSAL RESTRICTIONS ☐

US DOT DESCRIPTION

PROPER SHIPPING NAME: , BATTERIES DRY CONTAINING POTASSIUM HYDROXIDE SOLID ,
ADDITIONAL DESCRIPTION:
HAZARD CLASS: 8 DOT ID NUMBER: UN3028 PACKING GROUP NUMBER: PG III

GENERATOR CERTIFICATION STATEMENT

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS DOCUMENT AND THOSE ATTACHED HERETO ARE TRUE AND CORRECT. ALL WASTE TENDERED UNDER THIS WASTE PROFILE SHALL CONFORM TO THE SPECIFICATIONS ABOVE. TO THE BEST OF MY KNOWLEDGE, ALL KNOWN AND SUSPECTED HAZARDOUS COMPONENTS (40 CFR 261 .268) OF THIS WASTE STREAM HAVE BEEN IDENTIFIED ABOVE.

SIGNATURE X TITLE DATE

THE UNDERSIGNED CERTIFIES THAT HE/SHE OBTAINED A REPRESENTATIVE SAMPLE OF THE WASTE MATERIAL DESCRIBED ABOVE, AND THAT THE FOLLOWING REPRESENTATIONS ARE TRUE AND CORRECT.

SAMPLING METHOD: SAMPLE QUANTITY: NAME:
SOURCE OF MATERIAL SAMPLED: DATE:

ENVIROTECH SYSTEMS, INC.
3601 - 121st STREET SW
LYNNWOOD, WA 98037
TELEPHONE: (206) 363-9000 FAX: (425) 513-5839

WASTE PRODUCT QUESTIONNAIRE

PROFILE ESI WPQ 02-151-15-04

GENERATOR NAME: SCHNITZER STEEL
SITE ADDRESS: 12005 N. BURGARD ST.
PORTLAND , OR 97203

INVOICE TO: SCHNITZER STEEL
ADDRESS: P.O. BOX 10047
PORTLAND , OR 97296-

DATE: 6/6/02
SIC CODE: 3599
GEN EPA ID: ORD099155574
CONTACT: JIM JAKUBIAK
PHONE: 503-286-6976

WASTE PRODUCT DESCRIPTION AND CHARACTERISTICS

WASTE PRODUCT NAME: LEAD ACID BATTERIES FOR RECYCLE
PROCESS GENERATING WASTE: DISCARDING UNWANTED PRODUCT
SOURCE:
FORM:

ODOR
(•) NONE ( ) MILD ( ) STRONG
DESCRIBE:

COLOR AND CLARITY
COLOR: NA
CLARITY: NA

PHYSICAL STATE AT 70F
(•) SOLID ( ) SLUDGE
( ) LIQUID ( ) POWDER
AVERAGE CONSISTENCY: BATTERIES

TOXIC CATEGORIES PRESENT
WDOECONC:
WEIGHT:
TOXICCAT:

LAYERS
(•) MULTI-LAYERED
( ) BI-LAYERED
( ) HOMOGENOUS
FREE LIQUIDS: NA

pH
(•) <= 2 ( ) 10.1 - 12.4
( ) 2 - 4 ( ) >= 12.5
( ) 4.1 - 10 ( ) EXACT:

DENSITY OR SPECIFIC GRAVITY
( ) LIQUID lbs/gal
( ) SOLID lbs/ft3

FLASH POINT
( ) < 73 F ( ) > 200 F ☐ CC ☐ EPA
( ) 73 - 141 F (•) NO FLASH ☐ OC ☐ DOT
( ) 142 - 199 F ( ) EXACT:

CONSTITUENTS
CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL)

	%
LEAD ACID BATTERIES	100
UNIVERSAL WASTE	

CHEMICAL NATURE
(•) I
( ) O
( ) I/O

METALS (PPM)
( ) TOTAL ( ) EPA TCLP
(•) GEN KNOWLEDGE

ARSENIC (As)	
BARIUM (Ba)	
CADMIUM (Cd)	
CHROMIUM (Cr)	
COPPER (Cu)	
LEAD (Pb)	
MERCURY (Hg)	
NICKEL (Ni)	
SELENIUM (Se)	
SILVER (Ag)	
ZINC (Zn)	
HEXCHROME	
OTHER	

GENERATOR HAS PROVIDED THE FOLLOWING
☐ SAMPLE ☐ MSDS ☐ WASTE ANALYSIS

SHIPPING INSTRUCTIONS
IS THIS A DOT HAZARDOUS MATERIAL
(•) YES
( ) NO
DOT RQ
BULK LIQUID: ☐
BULK SOLID: ☐
DRUM/CONTAINER TYPE: UN1H2 5 GAL DF
VOLUME:
PALLETS

RCRA HAZ WASTE ☐ EXEMPT WASTE ☐
STATE ONLY WASTE ☐ TSCA ☐

WASHINGTON STATE DESIGNATION
( ) EHW ( ) EXEMPT ( ) DW

WASTE CODES
US EPA WASTE CODE
WA DOE WASTE CODES
CA WASTE CODES
OR WASTE CODES
SUBJECT TO LAND DISPOSAL RESTRICTIONS ☐

US DOT DESCRIPTION

PROPER SHIPPING NAME: , BATTERIES, WET, FILLED WITH ACID
ADDITIONAL DESCRIPTION: (UNIVERSAL WASTE BATTERIES FOR RECYCLE)
HAZARD CLASS: 8 DOT ID NUMBER: UN2794 PACKING GROUP NUMBER: PG III

GENERATOR CERTIFICATION STATEMENT

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS DOCUMENT AND THOSE ATTACHED HERETO ARE TRUE AND CORRECT. ALL WASTE TENDERED UNDER THIS WASTE PROFILE SHALL CONFORM TO THE SPECIFICATIONS ABOVE. TO THE BEST OF MY KNOWLEDGE, ALL KNOWN AND SUSPECTED HAZARDOUS COMPONENTS (40 CFR 261 .268) OF THIS WASTE STREAM HAVE BEEN IDENTIFIED ABOVE.

SIGNATURE X TITLE DATE

THE UNDERSIGNED CERTIFIES THAT HE/SHE OBTAINED A REPRESENTATIVE SAMPLE OF THE WASTE MATERIAL DESCRIBED ABOVE, AND THAT THE FOLLOWING REPRESENTATIONS ARE TRUE AND CORRECT.

SAMPLING METHOD: SAMPLE QUANTITY: NAME:
SOURCE OF MATERIAL SAMPLED: DATE:

ENVIROTECH SYSTEMS, INC.
3601 - 121st STREET SW
LYNNWOOD, WA 98037
TELEPHONE: (206) 363-9000 FAX: (425) 513-5839

WASTE PRODUCT QUESTIONNAIRE

PROFILE ESI WPQ 02-151-15-03

GENERATOR NAME: SCHNITZER STEEL
SITE ADDRESS: 12005 N. BURGARD ST.
PORTLAND, OR 97203

INVOICE TO: SCHNITZER STEEL
ADDRESS: P.O. BOX 10047
PORTLAND, OR 97296-

DATE: 6/6/02
SIC CODE:
GEN EPA ID: ORD099155574
CONTACT: JIM JAKUBIAK
PHONE: 503-286-6976

WASTE PRODUCT DESCRIPTION AND CHARACTERISTICS

WASTE PRODUCT NAME: LITHIUM BATTERIES
PROCESS GENERATING WASTE: BATTERY REPLACEMENT
SOURCE:
FORM:

ODOR
(●) NONE ( ) MILD ( ) STRONG
DESCRIBE:

COLOR AND CLARITY
COLOR: VARIES
CLARITY: OPAQUE

PHYSICAL STATE AT 70F
(●) SOLID ( ) SLUDGE
( ) LIQUID ( ) POWDER
AVERAGE CONSISTENCY:

TOXIC CATEGORIES PRESENT
WDOECONC:
WEIGHT:
TOXICCAT:

LAYERS
(●) MULTI-LAYERED
( ) BI-LAYERED
( ) HOMOGENOUS
FREE LIQUIDS: 0

pH
( ) 10.1 - 12.4
( ) <= 2
( ) >= 12.5
( ) 2 - 4
( ) EXACT:
( ) 4.1 - 10
N/A

DENSITY OR SPECIFIC GRAVITY
( ) LIQUID lbs/gal
(●) SOLID lbs/ft3

FLASH POINT
( ) < 73 F ( ) > 200 F ☐ CC ☐ EPA
( ) 73 - 141 F (●) NO FLASH ☐ OC ☐ DOT
( ) 142 - 199 F ( ) EXACT:

CONSTITUENTS
CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL)

	%
~~LITHIUM~~ BATTERIES ALKALINE	100

CHEMICAL NATURE
(●) I
( ) O
( ) I/O

METALS (PPM)
( ) TOTAL ( ) EPA TCLP
(●) GEN KNOWLEDGE

ARSENIC (As)	NS
BARIUM (Ba)	NS
CADMIUM (Cd)	NS
CHROMIUM (Cr)	NS
COPPER (Cu)	NS
LEAD (Pb)	NS
MERCURY (Hg)	NS
NICKEL (Ni)	NS
SELENIUM (Se)	NS
SILVER (Ag)	NS
ZINC (Zn)	NS
HEXCHROME	NS
OTHER	NS

GENERATOR HAS PROVIDED THE FOLLOWING
☐ SAMPLE ☐ MSDS ☐ WASTE ANALYSIS

SHIPPING INSTRUCTIONS
IS THIS A DOT HAZARDOUS MATERIAL
( ) YES
(●) NO

DOT RQ
BULK LIQUID: ☐
BULK SOLID: ☐
DRUM/CONTAINER TYPE: 1A2 16 or 1A2 3C
VOLUME:

RCRA HAZ WASTE ☐ EXEMPT WASTE ☐
STATE ONLY WASTE ☐ TSCA ☐

WASHINGTON STATE DESIGNATION
( ) EHW ( ) EXEMPT ( ) DW

WASTE CODES
US EPA WASTE CODE
WA DOE WASTE CODES
CA WASTE CODES
OR WASTE CODES
SUBJECT TO LAND DISPOSAL RESTRICTIONS ☐

US DOT DESCRIPTION

PROPER SHIPPING NAME: ~~LITHIUM~~ BATTERY (ALKALINE)
ADDITIONAL DESCRIPTION:
HAZARD CLASS: 9 DOT ID NUMBER: UN~~3090~~ 3028 PACKING GROUP NUMBER: PG II

GENERATOR CERTIFICATION STATEMENT

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS DOCUMENT AND THOSE ATTACHED HERETO ARE TRUE AND CORRECT. ALL WASTE TENDERED UNDER THIS WASTE PROFILE SHALL CONFORM TO THE SPECIFICATIONS ABOVE. TO THE BEST OF MY KNOWLEDGE, ALL KNOWN AND SUSPECTED HAZARDOUS COMPONENTS (40 CFR 261 .268) OF THIS WASTE STREAM HAVE BEEN IDENTIFIED ABOVE.

SIGNATURE X TITLE DATE

THE UNDERSIGNED CERTIFIES THAT HE/SHE OBTAINED A REPRESENTATIVE SAMPLE OF THE WASTE MATERIAL DESCRIBED ABOVE, AND THAT THE FOLLOWING REPRESENTATIONS ARE TRUE AND CORRECT.

SAMPLING METHOD: SAMPLE QUANTITY: NAME:
SOURCE OF MATERIAL SAMPLED: DATE:

Memorandum

To: Jim Goodrich

From: Jim Jakubiak

Date: 7/15/2005

Re: Rail Car Debris Pile Waste Disposal Bids

I've received three bids for hauling and disposing of rail car debris from the SSI Portland scrap yard. All three venders (Waste Management, United Disposal and Waste Control) are reputable transporters of solid waste in the states of Oregon and Washington. All three venders are also working with reputable disposal facilities. The cost for transporting and disposing of the rail car debris is as follows:

- Waste Control - $45 per ton (WEYCO Landfill – Longview, WA.)
- United Disposal - $50.67 per ton (Coffin Butte Landfill – Corvallis, OR.)
- Waste Management - $57.41 per ton (Columbia Ridge Landfill – Arlington, OR.).

Wilkins Trucking previously transported this material to WM's Columbia Ridge Landfill for $42 per ton dating back to 2002. All three bids are attached. If we select the low bid (Waste Control), we will need to confirm this bid includes all fees and taxes and will need to negotiate a contract that defines the agreement and terms. We will also need to sample and profile the material based on requirements set forth by the accepting facility to document the material is a solid waste.

We should discuss at your earliest convenience.

SCHN00246716

WASTE CONTROL 425-4302
• RESIDENTIAL CARTS
• COMMERCIAL CONTAINERS
• INDUSTRIAL DROP BOXES
• RECYCLING FACILITY
EFFICIENT PUNCTUAL SERVICE

7-12-05

To: Jim Jakubiak
Schnitzer Steel

RE: Rail car waste disposal and haul.

Dear Jim
Below is our bid for the hauling and disposal of your "rail car demolition waste". We propose leaving three boxes on your site and exchanging them when full. We would ask that Schnitzer make every effort to place an average of 10 tons in each box.
This material will then go to the Weyerhauser Longview reload facility and will then be sent to the Weyco landfill in Cowlitz County.

Price per ton including	Metro fee	
	Haul fee	
	Disposal fee	$45.00 per ton.

Please call me at (360) 430-7822 with any questions. We appreciate this opportunity to serve you.

Sincerely,

Kevin Willis

OFFICE:
1150 3rd Avenue
Longview, WA 98632

BILLING:
P.O. Box 148
Kelso, WA 98626

United Disposal Service, Inc.
and
Santiam Sanitary Service, Inc.
2215 N. Front St. Woodburn, OR 97071
Phone: 503-981-1278
Fax: 503-982-7930

Fax

To: Jim Jakubiak From: Karla / Brett

Fax: Pages: 2

Phone: Date: 7-15-05

Re: Bid Cc:

☐Urgent ☒For Review ☐Please Comment ☐Please Reply ☐FYI

☐Please Recycle

United Disposal Service, Inc.

2215 N. FRONT STREET • WOODBURN, OREGON 97071-5999
RESIDENTIAL - COMMERCIAL - INDUSTRIAL - RECYCLING
TELEPHONE 981-1278

July 15, 2005

PROPOSAL FOR HAULING WOOD DEBRIS

1. To haul wood debris from Schnitzer's yard to Coffin Butte landfill.
2. United Disposal Service will provide two 48Yd boxes at Schnitzer's yard.
3. Haul rate of $9.00 per ton.
4. Disposal rate of $18.00 per ton.
5. Environmental fee of $3.00 per truckload.
6. Metro fee of $23.67 per ton.
7. Total charge per ton $50.67 per ton, plus the environmental fee per load.
8. United Disposal Service agrees to haul upon request from Schnitzer's within 24 hours.

Brett Davis, Operations Manager
United Disposal Service, An Allied Waste Company
(503) 981-1278
(503) 209-2819

WASTE MANAGEMENT, INC.

7227 N.E. 55th Avenue
Portland, OR 97218
Phone: 503-493-7827 Fax: 503-493-7822

FAX COVER PAGE

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA U.S. POSTAL SERVICE. WE APPRECIATE YOUR COOPERATION.

Date: 5/27/05

Attention: JIM JAKUBIAK

Company: SCHNITZER STEEL

Fax number: 286-6948

From: **Mark Krening – Industrial Landfill Sales (Oregon / SW Washington)**

Number of Pages (including cover sheet) : 3

Comments: REVISED RATE FOR RAIL CAR DEBRIS

If you do not receive all of the pages or this fax is illegible, please call 503-493-7827.

WASTE MANAGEMENT, INC.

7227 N.E. 55th Avenue
Portland, OR 97218
Phone: 503-493-7827 Fax: 503-493-7822

FAX COVER PAGE

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA U.S. POSTAL SERVICE. WE APPRECIATE YOUR COOPERATION.

Date: 5/27/05

Attention: JIM JAKUBIAK

Company: SCHNITZER STEEL

Fax number: 286-6948

From: **Mark Krening – Industrial Landfill Sales (Oregon / SW Washington)**

Number of Pages (including cover sheet) : 3

Comments: REVISED RATE FOR RAIL CAR DEBRIS

New Rate = $57.41

Should we solicit other bids?

If you do not receive all of the pages or this fax is illegible, please call 503-493-7827.

WASTE MANAGEMENT

Industrial Account Sales
7227 NE 55th Avenue
Portland, OR 97218
Phone: (503) 493-7827
Fax: (503) 493-7822

CONFIDENTIAL

May 27, 2005

Schnitzer Steel Products Company
Attn: Mr. Jim Jakubiak
P.O. Box 10047
Portland, OR 97296

RE: PROPOSAL FOR TRANSPORTATION AND DISPOSAL OF RAIL CAR DEMOLITION DEBRIS FROM PORTLAND, OR.

Dear Jim,

Thank you for the opportunity to provide a proposal for the transportation and disposal of rail car demolition debris from the Schnitzer Steel yard in Portland, Oregon. The disposal rates included in this proposal are based on preliminary information provided by the generator, or the generator's authorized representative.

Upon profile approval, Waste Management will accept this non-hazardous waste for disposal at Columbia Ridge Landfill in Arlington for a rate of **$ 42.91 per ton** (includes all taxes and fees). The disposal rate is broken down as follows:

- Base Rate: $ 18.00 per ton
- Metro Fee: $15.09 per ton
- Metro Excise Tax: $ 8.58 per ton
- ODEQ Tax: $ 1.24 per ton

Waste Management will subcontract transportation services to Wilkins Trucking for a rate of **$ 14.50 per ton**, per the three-way Agreement between Schnitzer, Wilkins and Waste Management.

All waste materials delivered by Schnitzer Steel must conform to the waste as described in Profile #0617CU. Waste Management may reject any waste materials that are considered non-conforming. Rates are subject to change based on increases in local, state, federal or Metro fees and taxes, and fuel surcharges. They may also be adjusted on an annual basis to account for increases in the Consumer Price Index. Rates will be reviewed on an annual basis.

By signing below, you agree to accept the pricing terms set forth in this letter, and acknowledge that this letter, along with the approved Waste Profile Sheet(s), shall be incorporated as Exhibit A to Waste Management's standard Industrial Waste Services Agreement.

We look forward to working with you on this project. Should you have any questions or require additional information, please feel free to contact me at 503-493-7827

Sincerely,

Mark Krening
Industrial Account Manager

Agreed and acknowledged:

_____
Authorized Representative
Schnitzer Investment Corporation

cc: Industrial Technical Service Dept.

Schnitzer Steel

Transmittal

To: Charlie Ford

From: Jim Jakubiak **Date:** 9/19/2005

Re: ASR Agreement

CC: 11 pages total

☐ **Urgent** ☑ **For Use** ☑ **Please Comment** ☑ **Please Reply** ☐ **Please Recycle**

Attached are the Schnitzer Steel ASR Agreements (attached) for transportation and disposal. Please review and call or email with comments. Thanks.

ASR file. Copy 1 to Matt Cusma

DAILY COVER SUPPLY AND TRANSPORTATION AGREEMENT

THIS DAILY COVER SUPPLY AND TRANSPORTATION AGREEMENT is made and entered into as of the latest date set forth on the signature page hereto by and between WASTE MANAGEMENT DISPOSAL SERVICES OF OREGON, INC., d.b.a. OREGON WASTE SYSTEMS, INC. ("OWS") and SCHNITZER STEEL INDUSTRIES, INC., d.b.a. SCHNITZER STEEL PRODUCTS CO. ("SSI").

Recitals

A. In the course of conducting its metal recovery and scrap metal recycling business at its site located at International Terminals in Portland, Oregon (the "Site"), SSI produces a by-product known as scrap metal recycling residue ("SMRR").

B. SMRR has been beneficially and legally used as alternative daily cover material at municipal solid waste landfills in the past, including landfills in Oregon.

C. OWS owns and operates Columbia Ridge Landfill and Recycling Center (the "Facility") located in Arlington, Oregon and is required by law to apply daily cover over wastes disposed at the Facility.

D. The parties wish to enter into this Agreement to coordinate the transportation of SMRR from the Site to the Facility and its use as alternative daily cover.

Agreements

In consideration of the promises and covenants contained herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the parties hereto hereby agree as follows:

1. **Services.** SSI shall tender for delivery and shall arrange through an independent contractor for the transportation to the Facility of SMRR generated at the Site for use by OWS as alternative daily cover. OWS shall coordinate the billing and invoicing of such transportation services as arranged by SSI and shall accept SMRR for use as alternative daily cover at the Facility. This Agreement shall be exclusive and, provided OWS is not in default hereunder, SSI shall ensure that any SMRR generated at the Site which is intended for beneficial use as alternative daily cover shall be transported to the Facility throughout the term of this Agreement.

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2. **Acceptable Waste.** Only SMRR as described in OWS's Waste Profile Sheet incorporated herein, and which SMRR is approved by OWS and permitted for use at the Facility in accordance with all laws, regulations and permits (hereinafter referred to as "Acceptable Waste") shall be accepted by OWS for transportation to and use at the Facility. If the SMRR changes such that the description of the material provided on the Waste Profile Sheet approved by OWS would no longer be accurate or complete, SSI shall prepare and obtain OWS's approval of a new Waste Profile Sheet, which approved Waste Profile Sheet shall then be deemed to be incorporated herein. SSI shall provide to OWS an updated Waste Profile Sheet annually or more often as reasonably requested by OWS or required by applicable laws, ordinances, rules, permit conditions, regulations or regulatory agencies or authorities.

3. **SSI Warranties.** SSI hereby represents and warrants that all SMRR tendered by SSI and transported to the Facility shall be Acceptable Waste and shall not be or contain any Excluded Waste. In addition, not less than ninety-five percent (95%) of the SMRR delivered to the Facility from the Site shall be suitable for use as daily cover and no more than five percent (5%) of such SMRR shall be unsuitable for daily cover for any reason, including incidental or abnormal discoloration or contamination caused by minor variabilities in SSI's production process. For purposes of this Agreement, Excluded Waste means waste that: (a) is not in conformance with the description of the waste in the Waste Profile Sheet incorporated herein; (b) is or contains any infectious waste, radioactive, volatile, corrosive, flammable, explosive, biomedical, biohazardous material or hazardous, dangerous, or toxic substances, as defined pursuant to or listed or regulated under applicable federal, state or local law, including, without limitation, 40 CFR Parts 260 through 270; (c) is prohibited from being transported to, received or used at the Facility by federal, state or local law, regulation, rule, code, ordinance, order, permit or permit condition; or (d) in OWS's reasonable opinion would present a significant risk to human health or the environment, cause a legal nuisance or otherwise create or expose OWS or SSI to potential liability. In addition to the foregoing, SSI represents and warrants that: (a) SSI shall, and shall cause any of its subcontractors to handle and transport all SMRR in a safe and workmanlike manner in full compliance with all applicable federal, state and local laws, ordinances, decisions, orders, rules or regulations; and (b) SSI has advised its applicable employees and subcontractors of OWS's prohibition on delivery of Excluded Waste, of the definitions and listing of hazardous waste and hazardous substances under applicable federal and state law and regulations and of the definition of Acceptable Waste herein.

4. **OWS Warranties.** OWS warrants that its use and handling of Acceptable Waste shall be in accordance with all applicable laws, regulations, rules, permits and orders of any governmental authority having jurisdiction.

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5. **Inspection, Testing Rejection of Waste.** Prior to tender for transportation and delivery to the Facility, SSI shall inspect all SMRR and shall remove any and all Excluded Waste. SSI shall test the Acceptable Waste and provide analytical results of such tests to OWS as often as reasonably requested by OWS or required by applicable laws, ordinances, rules, permit conditions, regulations or regulatory agencies or authorities. OWS shall have the right to inspect, analyze or test any waste transported to the Facility from the Site. OWS shall have the right to reject, refuse or revoke acceptance of any waste if, in the opinion of OWS, the waste or tender of delivery fails to conform to or SSI fails to comply with the terms of this Agreement, including SSI's warranties. In the event OWS rejects or revokes acceptance of waste hereunder, SSI shall, at its sole cost, remove or arrange to have the rejected waste removed from OWS's control or property within twenty (20) business days' of notice of rejection by OWS. In the event SSI fails to so remove the rejected waste within such 20-day period, OWS shall have the right to remove or dispose of such rejected waste. SSI shall pay and/or reimburse OWS for any and all costs, damages and/or fines incurred as a result of or relating to SSI's tender or delivery of Excluded Waste or other failure to comply or conform to this Agreement, including costs of inspection, testing and analysis. Title to, ownership of and liability for Excluded Waste shall at all times remain with SSI.

6. **Term.** The term of this Agreement shall be eight (8) years commencing on September 1, 1998 and expiring on August 31, 2006, unless earlier terminated or extended in accordance with the terms of this Agreement. The term of this Agreement may be renewed for an additional period of year(s) upon the mutual written agreement of the parties hereto.

7. **Charges and Payment.** In consideration of OWS's performance of services under this Agreement, including scheduling of transportation services, coordination of transportation billing and acceptance and use of SMRR, SSI shall pay to OWS the following rates per ton of SMRR delivered from the Site to the Facility: (a) between September 1, 1998 and August 31, 1999, a rate of $20.50 per ton; (b) between September 1, 1999 and August 31, 2000, a rate of $21.00 per ton; and (c) each twelve-month period commencing September 1, 2000 and thereafter during the term of this Agreement, the per ton rate then in effect as adjusted by fifty percent (50%) of the annual change in the Consumer Price Index as provided below. All rates are f.o.b. the Facility.

7.1 The per ton rate shall be adjusted up or down each year beginning on September 1, 2000 by the percentage amount equal to the change in the Index between the current year and the previous year (calculated by subtracting the previous year's 12-month average from the current year's 12-month average and dividing such difference by the previous year's 12-month average) times fifty percent (50%). For purposes of this Agreement, the "Index" shall mean the Consumer Price Index published by the U.S.

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Department of Labor, Bureau of Labor Statistics, for All-Urban Consumers, West-A (1982-84=100) as published nearest to the September 1 adjustment date.

7.2 The above rates may be adjusted by OWS in the event SSI fails to tender and ensure delivery to the Facility of all SMRR as described in Section 1. OWS may also adjust the rates for any tax, tariff, fee or other charge assessed on the storage, handling, transportation or use of SMRR by federal, state, and/or local laws and regulations after September 1, 1998. In addition, OWS shall have the right to pass on to SSI all additional costs incurred that are attributable to changes in law occurring after September 1, 1998. For purposes of this Agreement, changes in law are defined as any new or revised laws, statutes, rules, regulations, ordinances or permit conditions.

7.3 All rate adjustments under this Section 7 shall take effect upon written notice from OWS to SSI. SSI shall pay the rates in full within 20 days of receipt of each invoice from OWS. SSI shall pay a late fee and service charge on all past due amounts accruing from the date of the invoice at a rate of eight percent (8%) per annum.

8. **Insurance.** OWS and SSI each warrants that it shall, and shall ensure that its subcontractors, secure and maintain in full force and effect throughout the term of this Agreement policies of insurance providing commercial general liability, automobile liability, workers' compensation and environmental impairment or pollution liability coverage as is customary in each party's industry.

9. **Indemnification.** OWS and SSI (individually, the "Indemnitor") hereby each agrees to indemnify, hold harmless and defend the other party, and its owners, officers, directors, employees and agents (collectively, the "Indemnitees"), from and against any and all liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, judgments and costs and expenses incidental thereto, including attorneys' fees (collectively, "Damages"), which any or all of the Indemnitees may hereafter suffer, incur, be responsible for or pay out as a result of personal injuries, property damage, or contamination of or adverse effects on the environment, to the extent caused by, or arising from or in connection with the breach of any representations, covenants or warranties of the Indemnitor set forth in this Agreement, or any negligent actions or omissions or willful misconduct of the Indemnitor, its employees, officers, owners, directors, agents or subcontractors in the performance of this Agreement. Such indemnity shall exclude Damages to the extent they arise as a result of any negligent actions or omissions or willful misconduct of the Indemnitees or their employees, officers, owners, directors, agents or subcontractors.

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10. **Uncontrollable Circumstances.** Except for the obligation to pay fees for the transport and handling of SMRR at the Facility, the performance of this Agreement may be temporarily suspended by either party in the event delivery of Acceptable Waste by SSI or use of the same by OWS is prevented by a cause or causes beyond the reasonable control of the party requesting the suspension. The party affected by such uncontrollable circumstances shall not be liable for any delays caused thereby and shall not be deemed in default under this Agreement during the period the party is so prevented from performing. Such uncontrollable circumstances shall include, but not be limited to, acts of God, acts of war, riot, fire, explosion, accident, flood, sabotage, strikes or governmental laws (including nuisance), or material changes to permit conditions or regulations (provided that neither party is required to settle a labor dispute against its best judgment).

11. **Default, Termination.** If at any time either party determines or becomes aware that the other party is in default under or has breached any of the terms of this Agreement, the non-defaulting party shall provide written notice to the other party as to the nature of such default. If the defaulting party fails to cure such default within a reasonable period of time after receipt of such written notice, the non-defaulting party shall have the right to terminate this Agreement upon giving written notice.

12. **Disputes.** Any dispute between the parties arising out of this Agreement shall be resolved by arbitration in accordance with the then-effective commercial rules of the American Arbitration Association or the then-effective rules of the Arbitration Services of Portland, Inc., whichever organization is selected and designated in writing by the party initiating the arbitration. The arbitration shall take place in Portland, Oregon and the decision of the arbitrator(s) in the matter shall be final and binding on the parties, and any judgment upon the award rendered pursuant to such arbitration may be entered in any court having jurisdiction thereof. The arbitrator(s) shall have the authority, but shall not be required, to award to the prevailing party in the arbitration proceedings reasonable attorneys' fees, expert and non-expert witness costs and expenses, and all other reasonable costs and expenses incurred directly or indirectly in connection with the proceedings. Except as necessary in a judicial proceeding allowable under this Section or otherwise required by law or legal process, the parties shall keep all matters relating to any arbitration confidential.

13. **Assignment; No Agency.** Neither party may assign, transfer, or otherwise vest in any other company, entity, or person, in whole or in part, any of its rights or obligations under this Agreement or subcontract any portion of this Agreement without the prior written consent of the other party, which consent shall not be unreasonably withheld; *provided, however,* that OWS may assign or transfer its rights or obligations under this Agreement to an affiliate of OWS or a subsidiary of OWS's parent company without seeking or obtaining the approval of SSI. This Agreement shall be binding upon and

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inure to the benefit of the parties hereto and their respective heirs, personal representatives, assigns and successors. Neither party hereto nor anyone employed by either party shall represent, act, purport to or be deemed to be the agent, representative, employee or servant of the other party.

14. **Confidentiality.** Neither party shall disclose to third parties any of the terms or conditions of this Agreement without the other party's prior written approval. Each party shall further safeguard from unauthorized disclosure to third parties any information forwarded by the other party in the performance of services under this Agreement. Neither party shall disclose any of the above to any employee, agent or subcontractor unless the party can show to the satisfaction of the other party that such employee, agent or subcontractor has a legitimate need to know and is bound by a non-disclosure obligation similar to the foregoing.

15. **Entire Agreement; Survival.** This Agreement represents the entire understanding and agreement between the parties hereto relating to the transportation and acceptance of SMRR at the Facility and supersedes any and all prior agreements, whether written or oral, between the parties regarding the same. No course of performance, usage of trade, understandings, purchase orders or agreements purporting to modify, supplement or explain any provision of this Agreement shall be effective unless it is executed in writing and signed by both parties. SSI's obligations and warranties regarding the SMRR delivered to the Facility and all indemnities provided herein shall survive termination of this Agreement.

16. **Miscellaneous.**

16.1 No waiver of any provision or condition of this Agreement shall be construed or deemed to be a waiver of any other provision or condition unless so expressed in writing and signed by both parties involved.

16.2 Any notice, communication or statement required or permitted to be given hereunder shall be in writing and deemed to have been sufficiently given when delivered in person or by certified mail, postage prepaid, return receipt requested, to the parties' addresses on the signature page hereto.

16.3 The validity, interpretation and performance of this Agreement shall be construed in accordance with the laws of the State of Oregon. If any provision of this Agreement is declared invalid or unenforceable, then such provision shall be deemed severable from and shall not affect the remainder of this Agreement.

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EXECUTED by the duly authorized representatives of the parties as of the latest date set forth below.

Waste Management Disposal
Services of Oregon, Inc.
d.b.a. Oregon Waste Systems, Inc.

By: _____
(signed)

Scott A. Bradley
(print name)

Title: Division V.P.

Date: 8/20/99

Address for Notices:

Schnitzer Steel Industries, Inc.
d.b.a. Schnitzer Steel Products Co.

By: _____
(signed)

Terry L. Glucoft
(print name)

Title: Vice President

Date: _____

Address for Notices:

P.O. Box 10047
Portland, OR 97296-0047
Facsimile: 503-286-6948

\\JULIET\LEGAL\TZ\WASTE MGMT-AGR.doc

SCHN00246731

SCHNITZER STEEL PRODUCTS CO.

12005 N Burgard Road, Portland, Oregon 97203
P.O. Box 10047, Portland, Oregon 97296-0047
(503) 224-9900 FAX (503) 286-6948

-004 see Wilkins file for original

Daily Cover Transportation Agreement

Schnitzer Steel Industries, Inc., d/b/a Schnitzer Steel Products Co. ("Schnitzer") and Wilkins Trucking Co. ("Wilkins") agree to this Daily Cover Transportation Agreement ("Agreement") this 27th day of February, 2004.

1) Wilkins agrees to provide the equipment, personnel and services (collectively, the "Services") to haul auto shredder residue ("ASR") generated at Schnitzer's metal recovery and scrap metal recycling business at 12005 N. Burgard Rd., Portland, Oregon ("Scrap Yard") for disposal at the Columbia Ridge Landfill and Recycling Center in Arlington, Oregon ("Landfill").

2) Schnitzer will load ASR into trailers provided by Wilkins. Said trailers will be of a size and configuration so as to be loaded directly from Schnitzer's hopper or, at Schnitzer's discretion, by front end loaders operated by Schnitzer.

3) Wilkins shall provide a sufficient number of trucks and trailers to haul all of Schnitzer's daily output of ASR from the Scrap Yard to the Landfill. At a minimum, Wilkins will have ten (10) chip trailers, each to be 40 feet in length and capable of holding between 25 and 30 tons of ASR, equipped with tarps, available to haul ASR from the Scrap Yard on a daily basis.

4) The parties anticipate that Schnitzer will generate approximately 1,750 net tons of ASR, each week of five (5) working days. In addition, Wilkins, on five (5) days prior notice from Schnitzer, will provide trucks to perform transportation of ASR on Saturdays and/or legal holidays. Wilkins acknowledges that Schnitzer does <u>not</u> guarantee any minimum amount of ASR for hauling over the term of this Agreement. Schnitzer's generation of ASR for hauling is subject to interruption as described in Section 10 herein.

5) Each load of ASR generated by Schnitzer and carried by Wilkins to the Landfill will be accompanied by a manifest which identifies the ASR as having been generated at the Scrap Yard.

6) (a) Schnitzer will pay Wilkins the base rate of $14.50 per net ton ("Base Rate") for ASR transported to the Landfill. The actual tonnage of ASR carried by Wilkins will be determined by scale weights at the Landfill which, in the absence of obvious error, will be conclusive on the parties.

(b) The Base Rate will be subject to adjustment by Wilkins, on thirty (30) days prior written notice to Schnitzer, in the event any governmental agency having jurisdiction over the Services increases the costs of fees, permits or assessments applicable to the Services; <u>provided</u>, <u>however</u>, in the event the aggregate of any

5/24/04

such increases to the Base Rate in any twelve-month period exceeds eight percent, Schnitzer may terminate the Agreement on thirty (30) days written notice.

(c) The Base Rate will be subject to adjustment, up or down, based on changes in the price of diesel fuel charged to Wilkins' by its fuel supplier. In determining the adjustment, the fuel price charged to Wilkins by its fuel supplier during any calendar week during the term of this Agreement will be compared against the average fuel price charged by that fuel supplier during the preceding four (4) calendar years. For purposes of calculating the adjustment, the parties agree that, on average, each of Wilkins' trucks will consume 75 gallons of diesel fuel in one round trip, in hauling 30 net tons of ASR from the Scrap Yard to the Landfill. By way of example, the calculation of the fuel price adjustment to the Base Rate is illustrated in the attached Exhibit A.

7) Wilkins will issue an invoice to Landfill on the 1st day of each week for ASR delivered to the Landfill during the prior week. The invoice will also reflect any fuel surcharge then in effect. In the absence of any dispute as to the amount of ASR delivered to the Landfill, payment will be made by Landfill within fifteen (15) days after its receipt of the invoice. Interest shall accrue on invoices which are more than thirty (30) days past due, at a monthly rate of one percent (1%). Landfill will then invoice Schnitzer for any amounts paid by Landfill to Wilkins for the ASR delivered. 1% MPW

8) Schnitzer represents and warrants that: (a) it will comply with all federal, state and local laws regulating the generation and/or handling of ASR at its Scrap Yard; and (b) the ASR is free of any "hazardous materials" or "hazardous substances", as those terms are defined in any federal or state law pertaining to the environment ("Environmental Laws").

9) Wilkins represents and warrants that (a) it has all required permits and governmental approvals to carry ASR from the Scrap Yard to the Landfill; (b) Wilkins's handling of ASR will comply with all Environmental Laws; (c) its performance of the Services will be in strict compliance with all federal, state and local laws, rules, regulations and orders in effect during the term of the Agreement; and (d) it will comply with any rules and regulations in effect during the term of this Agreement at the Landfill and a the Scrap Yard.

10) (a) Schnitzer's ability to generate ASR is subject to interruption in the event of circumstances beyond Schnitzer's reasonable control including, but not limited to: acts of God, war, riot, fire, explosion, accident, flood, sabotage, labor dispute, acts of any governmental authority or agency having jurisdiction over the Scrap Yard, or Schnitzer's inability to generate ASR because of equipment breakdown, lack of raw materials or such other circumstance.

(b) Wilkins acknowledges that Schnitzer may in the future elect to transport ASR to the Landfill by containers carried aboard river barges. Schnitzer, on sixty (60)

days prior written notice, may terminate this Agreement in the event it elects to utilize barges to transport ASR. In the event of any such termination, Schnitzer will pay Wilkins a termination amount which will be based upon the unamortized amount of the ten (10) trailers purchased by Wilkins prior to June 1, 2004, less any amounts realized by Wilkins in a commercially reasonable sale of said trailers to a third party.

11) Each of the parties (individually, an "Indemnitor") agrees to defend, indemnify and hold harmless the other party and its officers, directors, employees and agents (the "Indemnitees") from and against any and all liabilities, penalties, fines, forfeitures, demands, claims, causes of action, legal proceedings, settlements, judgments, costs and expenses including attorneys' fees which any of the Indemnitees may incur for personal injury or death, property damage or environmental contamination to the extent caused by or arising out of Indemnitor's breach of any representation or warranty hereunder, negligence or breach of any obligation in performance of this Agreement.

12) Prior to commencing its Services, Wilkins will provide Schnitzer with certificates of insurance evidencing it has obtained insurance as required pursuant to Schedule 1 attached hereto.

13) Services pursuant to this Agreement will begin on June 1, 2004 and will expire on May 31, 2008, subject to earlier termination as described herein.

14) Any disputes under this Agreement will be referred to the state courts in Multnomah, County, Oregon. EACH OF THE PARTIES AGREES TO WAIVE ITS RIGHT TO A TRIAL BY JURY IN ANY SUCH PROCEEDING. The prevailing party in any such proceeding will be entitled to an award of its reasonable attorneys' fees, cost and expenses incurred through trial, and on any appeal.

SCHNITZER STEEL INDUSTRIES, INC.

3-19-04

By:
Its: GM DOX

WILKINS TRUCKING CO.

By:
Its: PRES. 3/19/04

~~APPROVED BY:~~
~~OREGON WASTE SYSTEMS, INC.~~
Acknowledged By:
Waste Management Disposal Services of Oregon, Inc.

By: MARK KRENNING

Columbia Analytical Services inc.

January 23, 1998

Service Request No: K9800184

Tim Todd
Schnitzer Steel Products Company
P.O. Box 10047
Portland, OR 97210

Re: S.S.P. - Shredder

Dear Tim:

Enclosed are the results of the sample(s) submitted to our laboratory on January 9, 1998. For your reference, these analyses have been assigned our service request number K9800184.

All analyses were performed according to our laboratory's quality assurance program. All results are intended to be considered in their entirety, and Columbia Analytical Services, Inc. (CAS) is not responsible for use of less than the complete report. Results apply only to the samples analyzed.

Please call if you have any questions. My extension is 239.

Respectfully submitted,

Columbia Analytical Services, Inc.

Howard Boorse
Project Chemist

HB/ee

1317 South 13th Avenue • P.O. Box 479 • Kelso, Washington 98626 • Telephone 360/577-7222 • Fax 360/636-1068

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
J	Estimated concentration. The value is less than the method reporting limit, but greater than the method detection limit.
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NAN	Not Analyzed
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected at or above the MRL
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9800184
Project:	S.S.P. - Shredder	**Date Collected:**	12/31/97
Sample Matrix:	Solid	**Date Received:**	1/9/98
		Date Extracted:	NA
		Date Analyzed:	1/14/98

Solids, Total
EPA Method 160.3 Modified
Units: Percent (%)

Sample Name	Lab Code	Result
TB-1	K9800184-001	23.0

Approved By: EmA Date: 1/16/98

1A/102094
00184ICP.AB1 - TSolids 1/15/98

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9800184
Project:	S.S.P. - Shredder	**Date Collected:**	12/31/97
Sample Matrix:	Solid	**Date Received:**	1/9/98
		Date TCLP Performed:	1/13/98
		Date Extracted:	1/14/98

Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

			Sample Name:	**TB-1**	**Method Blank**
			Lab Code:	K9800184-001	K9800184-MB
			Date Analyzed:	1/14/98	1/14/98
Analyte	**EPA Method**	**MRL**	**Regulatory Limit***		
Arsenic	3010A/6010A	0.1	5	ND	ND
Barium	3010A/6010A	0.5	100	1.2	ND
Cadmium	3010A/6010A	0.01	1	ND	ND
Chromium	3010A/6010A	0.05	5	0.03	ND
Lead	3010A/6010A	0.05	5	ND	ND
Mercury	7470A	0.001	0.2	ND	ND
Selenium	3010A/6010A	0.1	1	ND	ND
Silver	3010A/6010A	0.01	5	ND	ND

* From 40 CFR Part 261, et al., and *Federal Register*, March 29, 1990 and June 29, 1990.

Approved By: JC Date: 1/22/98

TCLP/102194
00184ICP.EA1 - Sample 1/22/98

COLUMBIA ANALYTICAL SERVICES, INC.

QA/QC Report

Client:	Schnitzer Steel Products Co.	**Service Request:**	K9800184
Project:	S.S.P. - Shredder	**Date Collected:**	12/31/97
Sample Matrix:	Solid	**Date Received:**	1/9/98
		Date TCLP Performed:	1/13/98
		Date Extracted:	1/14/98
		Date Analyzed:	1/14/98

Matrix Spike Summary
Toxicity Characteristic Leaching Procedure (TCLP)
EPA Method 1311
Metals
Units: mg/L (ppm) in TCLP Extract

Sample Name: TB-1
Lab Code: K9800184-001

Analyte	**Spike Level**	**Sample Result**	**Spiked Sample Result**	**Percent Recovery***
Arsenic	5	ND	4.7	94
Barium	5	1.2	6.0	96
Cadmium	1	ND	0.92	92
Chromium	5	0.03	4.57	91
Lead	5	ND	4.54	91
Mercury	0.01	ND	0.011	110
Selenium	1	ND	1.0	100
Silver	1	ND	0.92	92

* Percent recovery information is provided in order to assess the performance of the method on this matrix.

Approved By: [signature] Date: 1-23-98

Columbia Analytical Services inc

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

1317 South 13th Ave. • Kelso, WA 98626 • (360) 577-7222 • (800) 695-7222 • FAX (360) [illegible]-1068

DATE 1/8/97 PAGE 1 OF 1

PROJECT NAME SSP-Shredder #

PROJECT MANAGER Tim Todd

COMPANY/ADDRESS Schnitzer Steel
P.O. Box 10047 Portland, OR 97269

FAX 503/286-6944 PHONE 286-6944

SAMPLERS SIGNATURE Timothy R. Todd

ANALYSIS REQUESTED

SAMPLE I.D.	DATE	TIME	LAB I.D.	SAMPLE MATRIX	NUMBER OF CONTAINERS	Base/Neu/Acid GC/MS 625/8270	Volatile Organics GC/MS 624/8240	Halogenated or Aromatic Volatiles 601/8010 ☐ 602/8020	Pesticides/PCBs 608/8080	Total Petroleum Hydrocarbons EPA418.1 ☐ OR418.1 ☐ WA418.1 ☐	TPH/Gas/BTEX Gas ☐ BTEX ☐ 5030/8015/8020	TPH/8015 Modified Diesel ☐ Hydrocarbon Scan ☐	TPH/HCID WA/HCID ☐ OR/HCID ☐	(TCLP) Metals ☐	Semi Pest/ VOA ☐ Herb ☐	Metals (total or dissolved) List Below	Cyanide	pH, Cond, Cl, SO_4, PO_4, F, Br NO_2, NO_3, (circle)	NH_3-N, COD, Total-P, TKN, TOC	Total Organic Halides (TOX) 9020 ☐ (AOX) 1650AO ☐			REMARKS
TB-1	12/31/97	1300		Solid	1									X									

00006

RELINQUISHED BY:	RECEIVED BY:	TURNAROUND REQUIREMENTS	REPORT REQUIREMENTS	INVOICE INFORMATION:	SAMPLE RECEIPT:
Signature: Timothy R. Todd	Signature: Kimberly Olson	___ 24 hr ___ 48 hr. ___ 5 day	X I. Routine Report	P.O.#	Shipping VIA:
Printed Name: Timothy Todd	Printed Name: KIMBERLY OLSON	X Standard (10-15 working days)	___ II. Report (includes DUP,MS, MSD, as required, may be charged as samples)	Bill To	Shipping #:
Firm: SSP	Firm: CAS	___ Provide Verbal Preliminary Results	___ III. Data Validation Report (includes All Raw Data)		Condition:
Date/Time: 1/8/98 13:30	Date/Time: 09 JAN 98 - 17:00	___ Provide FAX preliminary Results	___ IV. CLP Deliverable Report		Lab No: K9800184
		Requested Report Date			

RELINQUISHED BY:	RECEIVED BY:	SPECIAL INSTRUCTIONS/COMMENTS:
Signature	Signature	
Printed Name	Printed Name	
Firm	Firm	
Date/Time	Date/Time	

DISTRIBUTION: WHITE - return to originator; YELLOW - lab; PINK - retained by originator

400-05

SCHN00246741

ENVIROTECH SYSTEMS, INC.
18820 AURORA AVENUE NORTH, SUITE 201
SEATTLE, WA 98133-3914
TELEPHONE: (206) 363-9000 FAX: (206) 546-1920

WASTE PRODUCT QUESTIONNAIRE

PROFILE

ESI WPQ

Generator U.S. EPA I.D.: ORD099165574 | Sample Numbers: | Date: 6/26/99

Generator Name: SCHNITZER STEEL | Billing Address (if other than site): SCHNITZER STEEL

Site Address: 12005 N. BURGARD ST. | 12005 N. BURGARD ST.

PORTLAND, OR 97210 | PORTLAND, OR 97210

Generator Contact: JIM CARTWRIGHT | Title: | Phone: 503-286-0944

WASTE PRODUCT DESCRIPTION & CHARACTERISTICS

Waste Product Name: | Process Generating Waste: DISPOSAL UNWANTED UNUSED PIPE

ODOR: [X] None [ ] Mild [ ] Strong
Describe:

COLOR/CLARITY: VARIES
Opaque

PHYSICAL STATE AT 70°F: [X] Solid [ ] Sludge [X] Liquid [ ] Powder
Average Consistency

TOXIC CATEGORIES PRESENT
WDOE Equivalent Conc.
Batch/Monthly Weight: 1220 lbs

LAYERS: [ ] Multi-Layered [ ] Bi-Layered [ ] Homogenous
Free Liquids: %

pH: [ ] ≤ 2 [ ] 10.1-12.4 [X] 2-4 [ ] ≥ 12.5 [ ] 4.1-10 [ ] Exact

DENSITY OR SPECIFIC GRAVITY: 0.8 - 1.0
[ ] Liquid lbs/gal
[ ] Solid lbs/ft³

FLASH POINT: [ ] < 73°F [ ] > 200°F [X] CC [ ] EPA Ignitable [ ] 73° - 141°F [X] No Flash [ ] OC [ ] DOT Combustible [ ] 142° - 199°F [ ] Exact

CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL)

Tox Scan: [X] Positive [ ] Negative

		Tox Cat
TRANSITE PIPE COUPLINGS	100 %	

Halogenated Organic Compounds (HOC's) PPM

Chemical Nature: I [X] O [ ] I/O [ ]

Generator has provided the following: [ ] Sample [ ] MSDS [ ] Waste Analysis

METALS: [ ] Total (PPM) [ ] EPA TCLP

Arsenic (As)	NS
Barium (Ba)	NS
Cadmium (Cd)	NS
Chromium (Cr)	NS
Copper (Cu)	NS
Lead (Pb)	NS
Mercury (Hg)	NS
Nickel (Ni)	NS
Selenium (Se)	NS
Silver (Ag)	NS
Zinc (Zn)	NS
Hexchrome	NS
Other	NS

PESTICIDES PPM

Endrin	NS
Lindane	NS
Methoxychlor	NS
Toxaphene	NS
2,4-D	NS
2,4,5-T	NS
Other	NS

REACTIVES & OTHER WASTE

Cyanides	NS	PCB's	NS
Sulfides	NS	Phenolics	NS
Amines	NS	Other	NS

SHIPPING INSTRUCTIONS

Is this a DOT Hazardous Material: [ ] Yes [X] No
Reportable Quantities: [ ] DOT RQ [ ] EPA RQ
Is Waste: [ ] Poison [ ] Inhalation Hazard [ ] Dangerous when wet
Method of Shipment: [ ] Bulk Liquid [ ] Bulk Solid [ ] Drum (Size/Type)
Anticipated Volume/Units per Batch/Frequency: 100#

EPA/WASHINGTON STATE HAZARDOUS PROPERTIES

[ ] US EPA Hazardous Waste Codes
[ ] WA State Hazardous Waste Codes
State Designation: [ ] DW [ ] EHW
Is Waste Product: [ ] Corrosive [ ] Water Reactive [ ] Oxidizer [ ] Pyrophoric [ ] Shock Sensitive [ ] Carcinogen [ ] Etiological [ ] Explosive [X] None of Above
[ ] Subject to Land Disposal Restrictions (If checked, attach completed notification)

U.S. DOT DESCRIPTION

MATERIAL NOT REGULATED BY D.O.T.
( )
Proper Shipping Name | Additional Required Description
Hazard Class | DOT I.D. Number | Packing Group Number

GENERATOR CERTIFICATION STATEMENT

I hereby certify that all information submitted in this document and those attached hereto is true and correct. All waste tendered under this waste profile shall conform to the specifications listed above. To the best of my knowledge, all known and suspected hazardous components (40 CFR 261 & 268) of this waste stream have been identified above.

Signature X [illegible] Title [illegible] Date [illegible]

The undersigned certifies that he/she obtained a representative sample of the waste material above referenced, and that the following representations are true and correct.

Sampling Method: DRUM THIEF | Amount: 350#1 | Name:

Source of Material Sampled: | Signature: | Date:

PRINTED ON RECYCLED PAPER

SCHN00246744

ENVIROTECH SYSTEMS, INC.
18820 AURORA AVENUE NORTH, SUITE 201
SEATTLE, WA 98133-3914
TELEPHONE: (206) 363-9000 FAX: (206) 546-1920

WASTE PRODUCT QUESTIONNAIRE

PROFILE

ESI WPQ [illegible]

Generator U.S. EPA I.D. [illegible] | Sample Numbers | Date [illegible]

Generator Name [illegible] | Billing Address (if other than site) [illegible]

Site Address [illegible] | [illegible]

[illegible] PORTLAND, OR 97206 | PORTLAND, OR 97210

Generator Contact [illegible] | Title | Phone [illegible]

WASTE PRODUCT DESCRIPTION & CHARACTERISTICS

Waste Product Name [illegible] | Process Generating Waste [illegible]

ODOR: ☐ None ☐ Mild ☐ Strong
Describe

COLOR/CLARITY: [illegible]
Opaque

PHYSICAL STATE AT 70°F: ☐ Solid ☐ Sludge ☐ Liquid ☐ Powder
Average Consistency

TOXIC CATEGORIES PRESENT
WDOE Equivalent Conc.
Batch/Monthly Weight [illegible] lbs

LAYERS: ☐ Multi-Layered ☐ Bi-Layered ☐ Homogenous
Free Liquids %

pH: ☐ ≤ 2 ☐ 10.1-12.4 ☐ 2-4 ☐ ≥ 12.5 ☐ 4.1-10 ☐ Exact

DENSITY OR SPECIFIC GRAVITY: 1.3-1.4
☐ Liquid lbs/gal
☐ Solid lbs/ft³

FLASH POINT: ☐ <73°F ☐ > 200°F ☐ CC ☐ EPA Ignitable ☐ 73° - 141°F ☐ No Flash ☐ OC ☐ DOT Combustible ☐ 142° - 199°F ☐ Exact

CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL)

		%	Tox Cat
Tox Scan ☐ Positive ☐ Negative	EMPTY ACETYLENE CYLINDER	100	
Halogenated Organic Compounds (HOC's) PPM			
Chemical Nature ☐ O ☐ I/O ☐			
Generator has provided the following: ☐ Sample ☐ MSDS ☐ Waste Analysis			

METALS
☐ Total (PPM)
☐ EPA TCLP

Arsenic (As)	NS
Barium (Ba)	NS
Cadmium (Cd)	NS
Chromium (Cr)	NS
Copper (Cu)	NS
Lead (Pb)	NS
Mercury (Hg)	NS
Nickel (Ni)	NS
Selenium (Se)	NS
Silver (Ag)	NS
Zinc (Zn)	NS
Hexchrome	NS
Other	NS

PESTICIDES PPM

Endrin	NA
Lindane	NA
Methoxychlor	NA
Toxaphene	NA
2,4-D	NA
2,4,5-T	NA
Other	NA

REACTIVES & OTHER WASTE
Cyanides NS PCB's NS
Sulfides NS Phenolics NS
Amines NS Other NS

SHIPPING INSTRUCTIONS

Is this a DOT Hazardous Material ☐ Yes ☐ No
Reportable Quantities ☐ DOT RQ ☐ EPA RQ
Is Waste ☐ Poison ☐ Inhalation Hazard ☐ Dangerous when wet
Method of Shipment ☐ Bulk Liquid ☐ Bulk Solid ☐ Drum (Size/Type)
Anticipated Volume/Units per Batch/Frequency 3 PALLETS

EPA/WASHINGTON STATE HAZARDOUS PROPERTIES

☐ US EPA Hazardous Waste Codes
☐ WA State Hazardous Waste Codes
State Designation ☐ DW ☐ EHW
Is Waste Product ☐ Corrosive ☐ Water Reactive ☐ Oxidizer ☐ Pyrophoric ☐ Shock Sensitive ☐ Carcinogen ☐ Etiological ☐ Explosive ☐ None of Above
☐ Subject to Land Disposal Restrictions (If checked, attach completed notification)

U.S. DOT DESCRIPTION

( ) MATERIAL NOT REGULATED BY DOT
Proper Shipping Name | Additional Required Description
Hazard Class | DOT I.D. Number | Packing Group Number

GENERATOR CERTIFICATION STATEMENT

I hereby certify that all information submitted in this document and those attached hereto is true and correct. All waste tendered under this waste profile shall conform to the specifications listed above. To the best of my knowledge, all known and suspected hazardous components (40 CFR 261 & 268) of this waste stream have been identified above.

Signature X [illegible] Title Traffic coordinator/[illegible] Date [illegible]

The undersigned certifies that he/she obtained a representative sample of the waste material above referenced, and that the following representations are true and correct.

Sampling Method DRUM THIEF Amount 350#1 Name

Source of Material Sampled | Signature | Date

PRINTED ON RECYCLED PAPER

SCHN00246745

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: O·R·D·0·9·9·1·5·5·5·7·4
Manifest Document No.: 9·1·7·1·8
2. Page 1 of 1

3. Generator's Name and Mailing Address
SCHNITZER STEEL
12005 N. BURGARD ST.
PORTLAND, OR 97210
4. Generator's Phone (503)-286-6944 ATTN: JIM JAKUBIAK

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC
6. US EPA ID Number: W·A·D·9·8·1·7·6·5·9·6·9
A. Transporter's Phone: (206) 363-900

7. Transporter 2 Company Name:
8. US EPA ID Number:
B. Transporter's Phone:

9. Designated Facility Name and Site Address
COLUMBIA RIDGE LANDFILL
& RECYCLING CENTER 18177 CEDAR SPRINGS LANE
ARLINGTON, OR 97812
10. US EPA ID Number: O·R·D·9·8·7·1·7·3·4·5·7
C. Facility's Phone: (541)454-2030

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. MATERIAL NOT REGULATED BY D.O.T.	001	CP	0050.0	P
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A. CRL #512951, ESI #9-145-12-2

E. Handling Codes for Wastes Listed Above
CERTIFICATE OF DISPOSAL REQUIRED

15. Special Handling Instructions and Additional Information
32-4
EMERGENCY INFORMATION CONTACT (206) 363-9000 OR (425) 771-0452.

16. **GENERATOR'S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
X Gloria Christian	X G. Christian	0	0	99

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
SCOTT R. LINDSAY	Scott R. L	05	28	99

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Gloria Christian	G. Christian	0	0	99

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

GENERATOR

TRANSPORTER

FACILITY

GENERATOR'S COPY

SCHN00246746

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ORD099155574
Manifest Document No.: 91719
2. Page 1 of 1

3. Generator's Name and Mailing Address
SCHNITZER STEEL
12005 N. BURGARD ST.
PORTLAND, OR 97210
4. Generator's Phone (503) 286-6944 ATTN: JIM JAKUBIAK

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC.
6. US EPA ID Number: WAD981765969
A. Transporter's Phone: (206) 363-9000

7. Transporter 2 Company Name:
8. US EPA ID Number:
B. Transporter's Phone:

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT
OF THE NORTHWEST 17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812
10. US EPA ID Number: ORD089452353
C. Facility's Phone: 541 454 2643

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. MATERIAL NOT REGULATED BY DOT	003	CW ~~DM~~	03200	P
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A. CWM #CL2780, ESI #9-145-12-1 X004

E. Handling Codes for Wastes Listed Above
CERTIFICATE OF DISPOSAL REQUIRED

15. Special Handling Instructions and Additional Information

EMERGENCY INFORMATION CONTACT (206) 363-9000 OR (425) 771-0452.

16. **GENERATOR'S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
X Gloria Christian	X G Christian	11	06	99

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Scott R Lindsay	Scott R Lindsay	05	28	99

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
~~Gloria Christ~~				

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

GENERATOR

TRANSPORTER

FACILITY

GENERATOR'S COPY

SCHN00246747

SCHNITZER STEEL

2001 ANNUAL DANGEROUS WASTE SUMMARY

SITE ADDRESS: 12005 North Burgard Way
Portland, OR 97210
ORD099155574

WASTE STREAM: Zep Big Z sodium hydroxide

PROFILE:	01-124-10-04	**WASTE DESIGNATION:**	DW /HW
EPA CODES:	D002	**WA CODES:**	
FORM CODES:	B110	**SYSTEM CODE:**	M041
WEIGHT:	100# lbs.	**RECYCLING CREDIT:**	0%

RECEIVING FACILITY: Ensco
American Oil Road
El Dorado, AR 71730
ARD069748192

WASTE STREAM: DW labpack

PROFILE:		**WASTE DESIGNATION:**	DW /HW
EPA CODES:	D039	**WA CODES:**	
FORM CODES:	B009	**SYSTEM CODE:**	M043
WEIGHT:	30# lbs.	**RECYCLING CREDIT:**	0%

RECEIVING FACILITY: Ensco
American Oil Road
El Dorado, AR 71730
ARD069748192

LAND DISPOSAL RESTRICTION NOTIFICATION FORM

For Wastes Subject to the Treatment Standards Found in 40 CFR 268

Generator Name: SCHNITZER STEEL

Manifest No.: AR121 8159

WMDS	WW / NWW	Waste Codes, Subcategories and Hazardous Constituents*	Special Conditions
134481	☐/☒	D002	
134822	☐/☒	D039	5
	☐/☐		
	☐/☐		
	☐/☐		
	☐/☐		
	☐/☐		

*For waste streams that carry the EPA waste codes F001-F005, and F039, the Regulated Hazardous Constituents (found in 40 CFR Part 268.40) must be identified. For waste streams that carry the EPA waste codes D001 (if Not Treated by CMBST or RORGS), D002-D043 (if treated in Non-CWA, Non-CWA equivalent or Non-SDWA facilities), the Underlying Hazardous Constituents (UHC's) must be identified. [Wastewater forms of D012-D017 do not require that UHC's be identified.] List the constituents on the corresponding line or include a marked copy of the Form G-F0505 for each WMDS.

Special Conditions:

1. Waste Requiring No Further Treatment
2. Lab Pack Waste Qualifying for Alternative Treatment under 40 CFR 268.42(c)
3. Hazardous Waste Debris subject to standard treatment requirements, 40 CFR 268.40
4. Hazardous Waste Debris subject to alternative standards in 40 CFR 268.45 (List Contaminants)
5. Waste Qualifying for Exemption and not subject to Land Disposal Restriction (Explain)
6. Characteristic wastes that are subject to the treatment standards in § 268.40 (other than those expressed as a required method of treatment) that are reasonably expected to contain underlying hazardous constituents as defined in § 268.2(i); are treated on-site to remove the hazardous characteristic and are then sent off-site for treatment of underlying hazardous constituents (List constituents).
7. Characteristic wastes that contain underlying hazardous constituents as defined § 268.2(i) that are treated on-site to remove the hazardous characteristic and the underlying hazardous constituents to levels in § 268.48 Universal Treatment Standards.
8. For Chemical Manufacturers, Petroleum Refineries, Coke By-Product Facilities and RCRA TSDFs handling wastes subject to 40 CFR 61 subpart FF ONLY: This waste is a "Controlled Benzene Waste" which is subject to the notification requirements of 40 CFR 61 subpart FF.
9. Certification for contaminated soil indicating the presence or absence of characteristic and / or listed hazardous wastes.
10. Certification for contaminated soil treated in accordance with 40 CFR 268.49.

Waste analysis is attached where available, otherwise, the information contained herein is based upon my thorough knowledge of the waste(s).

I hereby certify that I believe that the information I submitted is true, accurate and complete.

Signature [signature] Title Env. Administrator Date 5/23/01

Applicable certification language included on page 2 of this document.

Universal Treatment Standards 40 CFR 268.48

☐ For WMOS _____, the Underlying Constituents have been identified by marking the box to the left of each constituent.

MANIFEST _____

☒ None of the Underlying Constituents are present in the following WMOS(s): 1344821, 1344822

Constituents by Chemical Name	WW Conc.	NWW Conc.	Constituents by Chemical Name	WW Conc.	NWW Conc.
Acenaphthene	0.059	3.4	O,P'-DDD	0.023	0.087
Acenaphthylene	0.059	3.4	P,P'-DDD	0.023	0.087
Acetone*	0.28	160	O,P'-DDE	0.031	0.087
Acetonitrile	5.6	38	P,P'-DDE	0.031	0.087
Acetophenone	0.01	9.7	O,P'-DDT	0.0039	0.087
2-Acetylaminofluorene	0.059	140	P,P'-DDT	0.0039	0.087
Acrolein	0.29	NA	Dibenz(A,H)Anthracene	0.055	8.2
Acrylamide +	19	23	Dibenz(A,E)Pyrene	0.061	NA
Acrylonitrile	0.24	84	1,2-Dibromo-3-Chloropropane	0.11	15
Aldicarb sulfone+	0.056	0.28	1,2-Dibromoethane (Ethylene Dibromide)	0.028	15
Aldrin	0.021	0.066	Dibromomethane	0.11	15
4-Aminobiphenyl	0.13	NA	M-Dichlorobenzene	0.036	6
Aniline	0.81	14	O-Dichlorobenzene*	0.088	6
Anthracene	0.059	3.4	P-Dichlorobenzene	0.09	6
Aramite	0.36	NA	Dichlorodifluoromethane	0.23	7.2
Barban+	0.056	1.4	1,1-Dichloroethane	0.059	6
Bendiocarb+	0.056	1.4	1,2-Dichloroethane	0.21	6
Benomyl+	0.056	1.4	1,1-Dichloroethylene	0.025	6
Benz(A)Anthracene	0.059	3.4	Trans-1,2-Dichloroethylene	0.054	30
Benzal Chloride+	0.055	6	2,4-Dichlorophenol	0.044	14
Benzene*	0.14	10	2,6-Dichlorophenol	0.044	14
Benzo(B)Fluoranthene	0.11	6.8	2,4-Dichlorophenoxyacetic Acid (2,4-D)	0.72	10
Benzo(K)Fluoranthene	0.11	6.8	1,2-Dichloropropane	0.85	18
Benzo(G,H,I)Perylene	0.0055	1.8	Cis-1,3-Dichloropropylene	0.036	18
Benzo(A)Pyrene	0.061	3.4	Trans-1,3-Dichloropropylene	0.036	18
Alpha-BHC	0.00014	0.066	Dieldrin	0.017	0.13
Beta-BHC	0.00014	0.066	Diethyl Phthalate	0.2	28
Delta-BHC	0.023	0.066	P-Dimethylaminoazobenzene+	0.13	NA
Gamma-BHC	0.0017	0.066	2-4-Dimethyl Phenol	0.036	14
Bromodichloromethane	0.35	15	Dimethyl Phthalate	0.047	28
Bromomethane (Methyl Bromide)	0.11	15	Di-N-Butyl Phthalate	0.057	28
4-Bromophenyl Phenyl Ether	0.055	15	1,4-Dinitrobenzene	0.32	2.3
N-Butyl Alcohol*	5.6	2.6	4,6-Dinitro-O-Cresol	0.28	160
Butyl Benzyl Phthalate	0.017	28	2,4-Dinitrophenol	0.12	160
Butylate+	0.042	1.4	2,4-Dinitrotoluene	0.32	140
2-Sec-Butyl-4,6-Dinitrophenol (Dinoseb)	0.066	2.5	2,6-Dinitrotoluene	0.55	28
Carbaryl+	0.006	0.14	Di-N-Octyl Phthalate	0.017	28
Carbenzadim+	0.056	1.4	Di-N-Propylnitrosamine	0.4	14
Carbofuran+	0.006	0.14	1,4-Dioxane	12	170
Carbofuran phenol+	0.056	1.4	Diphenylamine	0.92	13
Carbon Disulfide*	3.8	4.8 mg/l	Diphenylnitrosamine	0.92	13
Carbon Tetrachloride*	0.057	6	1,2-Diphenylhydrazine	0.087	NA
Carbosulfan+	0.028	1.4	Disulfoton	0.017	6.2
Chlordane (Alpha And Gamma Isomers)	0.0033	0.26	Dithiocarbamates (total)+	0.028	28
P-Chloroaniline	0.46	16	Endosulfan I	0.023	0.066
Chlorobenzene*	0.057	6	Endosulfan II	0.029	0.13
Chlorobenzilate	0.1	NA	Endosulfan Sulfate	0.029	0.13
2-Chloro-1,3-Butadiene	0.057	0.28	Endrin	0.0028	0.13
Chlorodibromomethane	0.057	15	Endrin Aldehyde	0.025	0.13
Chloroethane	0.27	6	EPTC+	0.042	1.4
Bis(2-Chloroethoxy)Methane	0.036	7.2	Ethyl Acetate*	0.34	33
Bis(2-Chloroethyl)Ether	0.033	6	Ethyl Benzene*	0.057	10
2-Chloroethyl Vinyl Ether	0.062	NA	Ethyl Cyanide (Propanenitrile)	0.24	360
Chloroform	0.046	6	Ethyl Ether*	0.12	160
Bis(2-Chloroisopropyl)Ether	0.055	7.2	Ethyl Methacrylate	0.14	160
P-Chloro-M-Cresol	0.018	14	Ethylene Oxide	0.12	NA
Chloromethane(Methyl Chloride)	0.19	30	Bis(2-Ethylhexyl) Phthalate	0.28	28
2-Chloronaphthalene	0.055	5.6	Famphur	0.017	15
2-Chlorophenol	0.044	5.7	Fluoranthene	0.068	3.4
3-Chloropropylene	0.036	30	Fluorene	0.059	3.4
Chrysene	0.059	3.4	Formetanate hydrochloride+	0.056	1.4
O-Cresol*	0.11	5.6	Heptachlor	0.0012	0.066
M-Cresol*	0.77	5.6	Heptachlor Epoxide	0.016	0.066
P-Cresol*	0.77	5.6	Hexachlorobenzene	0.055	10
m-Cumenyl methylcarbamate+	0.056	1.4	Hexachlorobutadiene	0.055	5.6
Cyclohexanone*	0.36	0.75 mg/l	Hexachlorocyclopentadiene	0.057	2.4

Universal Treatment Standards 40 CFR 268.48 - Contd.

Constituents by Chemical Name	WW Conc.	NWW Conc.	Constituents by Chemical Name	WW Conc.	NWW Conc.
Hexachloroethane	0.055	30	Physostigmine salicylate+	0.056	1.4
Hexachloropropylene	0.035	30	Promecarb+	0.056	1.4
HXCDDs (All Hexachlorodibenzo-P-Dioxins)	0.000063	0.001	Pronamide	0.093	1.5
HXCDFs (All Hexachlorodibenzofurans)	0.000063	0.001	Propham+	0.056	1.4
Indeno (1,2,3-C,D) Pyrene	0.0055	3.4	Propoxur+	0.056	1.4
Iodomethane	0.19	65	Prosulfocarb+	0.042	1.4
Isobutyl Alcohol*	5.6	170	Pyrene	0.067	8.2
Isodrin	0.021	0.066	Pyridine*	0.014	16
Isosafrole	0.081	2.6	Safrole	0.081	22
Kepone	0.0011	0.13	Silvex (2,4,5-Tp)	0.72	7.9
Methacrylonitrile	0.24	84	1,2,4,5-Tetrachlorobenzene	0.055	14
Methanol*	5.6	0.75 mg/l	TCDDs (All Tetrachlorodibenzo-P-Dioxins)	0.000063	0.001
Methapyrilene	0.081	1.5	TCDFs (All Tetrachlorodibenzofurans)	0.000063	0.001
Methiocarb+	0.056	1.4	1,1,1,2-Tetrachloroethane	0.057	6
Methomyl+	0.028	0.14	1,1,2,2-Tetrachloroethane	0.057	6
Methoxychlor	0.25	0.18	Tetrachloroethylene*	0.056	6
Methyl Ethyl Ketone*	0.28	36	2,3,4,6-Tetrachlorophenol	0.03	7.4
Methyl Isobutyl Ketone*	0.14	33	Thiodicarb+	0.019	1.4
Methyl Methacrylate	0.14	160	Thiophanate-methyl+	0.056	1.4
Methyl Methansulfonate	0.018	NA	Toluene*	0.08	10
Methyl Parathion	0.014	4.6	Toxaphene	0.0095	2.6
3-Methylcholanthrene	0.0055	15	Triallate+	0.042	1.4
4,4-Methylene Bis(2-Chloroaniline)	0.5	30	Tribromomethane (Bromoform)	0.63	15
Methylene Chloride*	0.089	30	1,2,4-Trichlorobenzene	0.055	19
Metolcarb+	0.056	1.4	1,1,1-Trichloroethane*	0.054	6
Mexacarbate+	0.056	1.4	1,1,2-Trichloroethane*	0.054	6
Molinate+	0.042	1.4	Trichloroethylene*	0.054	6
Naphthalene	0.059	5.6	Trichlorotrifluoromethane*	0.02	30
2-Naphthylamine	0.52	NA	2,4,5-Trichlorophenol	0.18	7.4
O-Nitroaniline+	0.27	14	2,4,6-Trichlorophenol	0.035	7.4
P-Nitroaniline	0.028	28	2,4,5-Trichlorophenoxyacetic Acid (2,4,5-T)+	0.72	7.9
Nitrobenzene*	0.068	14	1,2,3-Trichloropropane	0.85	30
5-Nitro-O-Toluidine	0.32	28	1,1,2-Trichloro-1,2,2-Trifluoroethane*	0.057	30
O-Nitrophenol+	0.028	13	Triethylamine+	0.081	1.5
P-Nitrophenol	0.12	29	Tris-(2,3-Dibromopropyl) Phosphate	0.11	0.1
N-Nitrosodiethylamine	0.4	28	Vernolate+	0.042	1.5
N-Nitrosodimethylamine	0.4	2.3	Vinyl Chloride	0.27	6
N-Nitroso-Di-N-Butylamine	0.4	17	Constituents by Chemical Name	Conc.	Conc.
N-Nitrosomethylethylamine	0.4	2.3	Xylenes-Mixed Isomers(Sum Of O,M,&P)*	0.32	30
N-Nitrosomorpholine	0.4	2.3	Antimony	1.9	1.15 mg/l
N-Nitrosopiperidine	0.013	35	Arsenic	1.4	5.0 mg/l
N-Nitrosopyrrolidine	0.013	35	Barium	1.2	21 mg/l
Oxamyl+	0.056	0.28	Beryllium	0.82	1.22 mg/l
Parathion	0.014	4.6	Cadmium	0.69	0.11 mg/l
Total PCBs	0.1	10	Chromium (Total)	2.77	0.60 mg/l
Pebulate+	0.042	1.4	Cyanides (Total)	1.2	590
Pentachlorobenzene	0.055	10	Cyanides (Amenable)	0.86	30
PECDDs (All Pentachlorodibenzo-P-Dioxins)	0.000063	0.001	Fluoride	35	NA
PECDFs (All Pentachlorodibenzofurans)	0.000035	0.001	Lead	0.69	0.75 mg/l
Pentachloroethane+	0.055	6	Mercury-NWW From Retort	NA	0.20 mg/l
Pentachloronitrobenzene	0.055	4.8	Mercury-All Others	0.15	0.025 mg/l
Pentachlorophenol	0.089	7.4	Nickel	3.98	11.0 mg/l
Phenacetin	0.081	16	Selenium	0.82	5.7 mg/l
Phenanthrene	0.059	5.6	Silver	0.43	0.14 mg/l
Phenol	0.039	6.2	Sulfide	14	NA
Phorate	0.021	4.6	Thallium	1.4	0.20 mg/l
Phthalic Acid+	0.055	28	Vanadium (Not An "UHC")	4.3	1.6 mg/l
Phthalic Anhydride	0.055	28	Zinc + (Not An "UHC")	2.61	4.3 mg/l
Physostigmine+	0.056	1.4			

WW = Wastewater as defined in 40 CFR 268.2(f)

NWW = Non-Wastewater as defined in 40 CFR 268.2(f)

Regulated Hazardous Constituents for F001-F005 are indicated with (*).

Regulated Hazardous Constituents for F039 include all of those listed above except those indicated with (+).

All Values are mg/l for wastewater and mg/kg for non-wastewater, unless designated mg/l, which are TCLP

LDR NOTIFICATION FORM

☐ CWA ☐ NON-CWA

Indicate all waste codes and subcategories

WMDS 1344822

LAB PACK ADDENDUM

☐ ELIGIBLE UNDER 268 APPENDIX IV

☐ NOT ELIGIBLE UNDER 268 APPENDIX IV

Manifest AR1218157

☐	D001	High TOC
☐	D001	Low TOC
☐	D003	Explosives
☐	D003	Other Reactives
☐	D003	Reactive Cyanides
☐	D003	Reactive Sulfides
☐	D003	Water Reactives
☐	D006	Cadmium Containing Batteries
☐	D008	Lead Acid Batteries
☐	D009	NWW High Merc, Inorganic
☐	D009	NWW Low Merc, Inorganic
☐	D009	NWW Low Merc, Organic
☐	D009	NWW High Merc, Organic
☐	F003	Carbon Disulfide, Cyclohexanone, and/or Methanol
☐	F005	2-Nitropropane only
☐	F005	2-Ethoxyethanol only
☐	F025	Light Ends
☐	F025	Spent Filters/Aids and Desicants
☐	K069	Calcium Sulfate (Low Lead)
☐	K069	Non-Calcium Sulfate (High Lead)
☐	K071	NWW from RMERC
☐	K071	NWW not from RMERC
☐	K106	NWW Low Merc not from RMERC
☐	K106	NWW Low Merc from RMERC
☐	K106	NWW High Merc
☐	P065	NWW Low Merc INCIN residue
☐	P065	NWW High Merc INCIN residue
☐	P065	NWW not INCIN or RMERC residue
☐	P065	NWW High Merc RMERC residue
☐	P065	NWW Low Merc RMERC residue
☐	P092	NWW not INCIN or RMERC residue
☐	P092	NWW Low Merc RMERC residue
☐	P092	NWW Low Merc not RMERC residue
☐	P092	NWW Low Merc INCIN residue
☐	U151	NWW Low Merc INCIN residue
☐	U151	NWW Low Merc not RMERC residue
☐	D002	
☐	D004	
☐	D005	
☐	D006	
☐	D007	
☐	D008	
☐	D009	
☐	D010	
☐	D011	
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☐	D036	
☐	D037	
☐	D038	
☒	D039	
☐	D040	

☐	D041	☐	K052	☐	P028	☐	P116	☐	U052	☐	U131	☐	U209	☐	CA 121
☐	D042	☐	K060	☐	P029	☐	P118	☐	U053	☐	U132	☐	U210	☐	CA 122
☐	D043	☐	K061	☐	P030	☐	P119	☐	U055	☐	U133	☐	U211	☐	CA 123
☐	F001	☐	K062	☐	P031	☐	P120	☐	U056	☐	U134	☐	U213	☐	CA 131
☐	F002	☐	K064	☐	P033	☐	P121	☐	U057	☐	U135	☐	U214	☐	CA 132
☐	F003	☐	K065	☐	P034	☐	P122	☐	U058	☐	U136	☐	U215	☐	CA 133
☐	F004	☐	K066	☐	P036	☐	P123	☐	U059	☐	U137	☐	U216	☐	CA 134
☐	F005	☐	K071	☐	P037	☐	P127	☐	U060	☐	U138	☐	U217	☐	CA 135
☐	F006	☐	K073	☐	P038	☐	P128	☐	U061	☐	U139	☐	U218	☐	CA 141
☐	F007	☐	K083	☐	P039	☐	P185	☐	U062	☐	U140	☐	U219	☐	CA 151
☐	F008	☐	K084	☐	P040	☐	P188	☐	U063	☐	U141	☐	U220	☐	CA 161
☐	F009	☐	K085	☐	P041	☐	P189	☐	U064	☐	U142	☐	U221	☐	CA 162
☐	F010	☐	K086	☐	P042	☐	P190	☐	U066	☐	U143	☐	U222	☐	CA 171
☐	F011	☐	K087	☐	P043	☐	P191	☐	U067	☐	U144	☐	U223	☐	CA 172
☐	F012	☐	K088	☐	P044	☐	P192	☐	U068	☐	U145	☐	U225	☐	CA 181
☐	F019	☐	K090	☐	P045	☐	P194	☐	U069	☐	U146	☐	U226	☐	CA 211
☐	F020	☐	K091	☐	P046	☐	P196	☐	U070	☐	U147	☐	U227	☐	CA 212
☐	F021	☐	K093	☐	P047	☐	P197	☐	U072	☐	U148	☐	U228	☐	CA 213
☐	F022	☐	K095	☐	P048	☐	P198	☐	U073	☐	U149	☐	U234	☐	CA 214
☐	F023	☐	K096	☐	P049	☐	P199	☐	U074	☐	U150	☐	U235	☐	CA 221
☐	F024	☐	K097	☐	P050	☐	P201	☐	U075	☐	U151	☐	U236	☐	CA 222
☐	F026	☐	K098	☐	P051	☐	P202	☐	U076	☐	U152	☐	U237	☐	CA 223
☐	F027	☐	K099	☐	P054	☐	P203	☐	U077	☐	U153	☐	U238	☐	CA 231
☐	F028	☐	K100	☐	P056	☐	P204	☐	U078	☐	U154	☐	U239	☐	CA 232
☐	K001	☐	K101	☐	P057	☐	P205	☐	U079	☐	U155	☐	U240	☐	CA 241
☐	K002	☐	K102	☐	P058	☐	U001	☐	U080	☐	U156	☐	U243	☐	CA 251
☐	K003	☐	K103	☐	P059	☐	U002	☐	U081	☐	U157	☐	U244	☐	CA 252
☐	K004	☐	K104	☐	P060	☐	U003	☐	U082	☐	U158	☐	U246	☐	CA 261
☐	K005	☐	K105	☐	P062	☐	U004	☐	U083	☐	U159	☐	U247	☐	CA 271
☐	K006	☐	K106	☐	P063	☐	U005	☐	U084	☐	U160	☐	U248	☐	CA 272
☐	K007	☐	K111	☐	P064	☐	U006	☐	U085	☐	U161	☐	U249	☐	CA 281
☐	K008	☐	K112	☐	P065	☐	U007	☐	U086	☐	U162	☐	U271	☐	CA 291
☐	K009	☐	K113	☐	P066	☐	U008	☐	U087	☐	U163	☐	U277	☐	CA 311
☐	K010	☐	K114	☐	P067	☐	U009	☐	U088	☐	U164	☐	U278	☐	CA 321
☐	K011	☐	K115	☐	P068	☐	U010	☐	U089	☐	U165	☐	U279	☐	CA 322
☐	K013	☐	K116	☐	P069	☐	U011	☐	U090	☐	U166	☐	U280	☐	CA 331
☐	K014	☐	K117	☐	P070	☐	U012	☐	U091	☐	U167	☐	U328	☐	CA 341
☐	K015	☐	K118	☐	P071	☐	U014	☐	U092	☐	U168	☐	U353	☐	CA 342
☐	K016	☐	K123	☐	P072	☐	U015	☐	U093	☐	U169	☐	U359	☐	CA 343
☐	K017	☐	K124	☐	P073	☐	U016	☐	U094	☐	U170	☐	U364	☐	CA 351
☐	K018	☐	K125	☐	P074	☐	U017	☐	U095	☐	U171	☐	U365	☐	CA 352
☐	K019	☐	K126	☐	P075	☐	U018	☐	U096	☐	U172	☐	U366	☐	CA 411
☐	K020	☐	K136	☐	P076	☐	U019	☐	U097	☐	U173	☐	U367	☐	CA 421
☐	K021	☐	K156	☐	P077	☐	U020	☐	U098	☐	U174	☐	U372	☐	CA 431
☐	K022	☐	K157	☐	P078	☐	U021	☐	U099	☐	U176	☐	U373	☐	CA 441
☐	K023	☐	K158	☐	P081	☐	U022	☐	U101	☐	U177	☐	U375	☐	CA 451
☐	K024	☐	K159	☐	P082	☐	U023	☐	U102	☐	U178	☐	U376	☐	CA 461
☐	K025	☐	K160	☐	P084	☐	U024	☐	U103	☐	U179	☐	U377	☐	CA 471
☐	K026	☐	K161	☐	P085	☐	U025	☐	U105	☐	U180	☐	U378	☐	CA 481
☐	K027	☐	P001	☐	P087	☐	U026	☐	U106	☐	U181	☐	U379	☐	CA 491
☐	K028	☐	P002	☐	P088	☐	U027	☐	U107	☐	U182	☐	U381	☐	CA 511
☐	K029	☐	P003	☐	P089	☐	U028	☐	U108	☐	U183	☐	U382	☐	CA 512
☐	K030	☐	P004	☐	P092	☐	U029	☐	U109	☐	U184	☐	U383	☐	CA 513
☐	K031	☐	P005	☐	P093	☐	U030	☐	U110	☐	U185	☐	U384	☐	CA 521
☐	K032	☐	P006	☐	P094	☐	U031	☐	U111	☐	U186	☐	U385	☐	CA 531
☐	K033	☐	P007	☐	P095	☐	U032	☐	U112	☐	U187	☐	U386	☐	CA 541
☐	K034	☐	P008	☐	P096	☐	U033	☐	U113	☐	U188	☐	U387	☐	CA 551
☐	K035	☐	P009	☐	P097	☐	U034	☐	U114	☐	U189	☐	U389	☐	CA 561
☐	K036	☐	P010	☐	P098	☐	U035	☐	U115	☐	U190	☐	U390	☐	CA 571
☐	K038	☐	P011	☐	P099	☐	U036	☐	U116	☐	U191	☐	U391	☐	CA 581
☐	K038	☐	P012	☐	P101	☐	U037	☐	U117	☐	U192	☐	U392	☐	CA 591
☐	K039	☐	P013	☐	P102	☐	U038	☐	U118	☐	U193	☐	U393	☐	CA 611
☐	K040	☐	P014	☐	P103	☐	U039	☐	U119	☐	U194	☐	U394	☐	CA 612
☐	K041	☐	P015	☐	P104	☐	U041	☐	U120	☐	U196	☐	U395	☐	CA 613
☐	K042	☐	P016	☐	P105	☐	U042	☐	U121	☐	U197	☐	U396	☐	CA 711
☐	K043	☐	P017	☐	P106	☐	U043	☐	U122	☐	U200	☐	U400	☐	CA 721
☐	K044	☐	P018	☐	P108	☐	U044	☐	U123	☐	U201	☐	U401	☐	CA 722
☐	K045	☐	P020	☐	P109	☐	U045	☐	U124	☐	U202	☐	U402	☐	CA 723
☐	K046	☐	P021	☐	P110	☐	U046	☐	U125	☐	U203	☐	U403	☐	CA 724
☐	K047	☐	P022	☐	P111	☐	U047	☐	U126	☐	U204	☐	U404	☐	CA 725
☐	K048	☐	P023	☐	P112	☐	U048	☐	U127	☐	U205	☐	U407	☐	CA 726
☐	K049	☐	P024	☐	P113	☐	U049	☐	U128	☐	U206	☐	U409	☐	CA 727
☐	K050	☐	P026	☐	P114	☐	U050	☐	U129	☐	U207	☐	U410	☐	CA 728
☐	K051	☐	P027	☐	P115	☐	U051	☐	U130	☐	U208	☐	U411	☐	CA 731
														☐	CA 741
														☐	CA 751
														☐	CA 791
														☐	CA 792
														☐	CA 801

ENVIROTECH SYSTEMS, INC.
3601121st STREET SW
LYNNWOOD, WA 98037
TELEPHONE: (206) 363-9000 FAX: (425) 513-5839

WASTE PRODUCT QUESTIONNAIRE

PROFILE ESI WPQ 01-124-10-04

GENERATOR NAME: SCHNITZER STEEL
INVOICE TO: SCHNITZER STEEL
DATE: 5/7/01
SIC CODE:
SITE ADDRESS: 12005 N. BURGARD ST.
ADDRESS: P.O. BOX 10047
GEN EPA ID: ORD099155574
CONTACT: JIM JAKUBIAK
PORTLAND, OR 97203
PORTLAND, OR 97296-
PHONE: 503-286-6976

WASTE PRODUCT DESCRIPTION AND CHARACTERISTICS

WASTE PRODUCT NAME: ZEP BIG Z SODIUM HYDROXIDE
SOURCE:
PROCESS GENERATING WASTE: DISCARDING UNWANTED PRODUCT
FORM:

ODOR
○ NONE ◉ MILD ○ STRONG
DESCRIBE: SOAP

COLOR AND CLARITY
COLOR: BLACK
CLARITY: NONE

PHYSICAL STATE AT 70F
○ SOLID ○ SLUDGE
◉ LIQUID ○ POWDER
AVERAGE CONSISTENCY:

TOXIC CATEGORIES PRESENT
WDOECONC:
WEIGHT:
TOXICCAT:

LAYERS
○ MULTI-LAYERED
○ BI-LAYERED
◉ HOMOGENOUS
FREE LIQUIDS: 100%

pH
○ <= 2 ○ 10.1 - 12.4
○ 2 - 4 ◉ >= 12.5
○ 4.1 - 10 ○ EXACT:

DENSITY OR SPECIFIC GRAVITY
1.20
◉ LIQUID lbs/gal
○ SOLID lbs/ft3

FLASH POINT
○ < 73 F ○ > 200 F ☐ CC ☐ EPA
○ 73 - 141 F ◉ NO FLASH ☐ OC ☐ DOT
○ 142 - 199 F ○ EXACT:

CONSTITUENTS
CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL)

	%
SODIUM HYDROXIDE	10-20
WATER	80-90
SURFACTANTS	1-3

CHEMICAL NATURE
◉ I
○ O
○ I/O

METALS (PPM)
○ TOTAL ○ EPA TCLP
◉ GEN KNOWLEDGE

ARSENIC (As)	NS
BARIUM (Ba)	NS
CADMIUM (Cd)	NS
CHROMIUM (Cr)	NS
COPPER (Cu)	NS
LEAD (Pb)	NS
MERCURY (Hg)	NS
NICKEL (Ni)	NS
SELENIUM (Se)	NS
SILVER (Ag)	NS
ZINC (Zn)	NS
HEXCHROME	NS
OTHER	NS

GENERATOR HAS PROVIDED THE FOLLOWING
☑ SAMPLE ☑ MSDS ☐ WASTE ANALYSIS

SHIPPING INSTRUCTIONS
IS THIS A DOT HAZARDOUS MATERIAL
○ YES
◉ NO
DOT RQ
BULK LIQUID: ☐
BULK SOLID: ☐
DRUM/CONTAINER TYPE: UN1H1 16 GAL DF
VOLUME: 7 GALLONS

RCRA HAZ WASTE ☑ EXEMPT WASTE ☐
STATE ONLY WASTE ☐ TSCA ☐

WASHINGTON STATE DESIGNATION
○ EHW ○ EXEMPT ○ DW

WASTE CODES
US EPA WASTE CODE D002
WA DOE WASTE CODES
CA WASTE CODES
OR WASTE CODES
SUBJECT TO LAND DISPOSAL RESTRICTIONS ☐

US DOT DESCRIPTION

PROPER SHIPPING NAME: , CORROSIVE LIQUID,INORGANIC, N.O.S.
ADDITIONAL DESCRIPTION: (SODIUM HYDROXIDE)
HAZARD CLASS: 8 DOT ID NUMBER: UN3266 PACKING GROUP NUMBER: PG II

GENERATOR CERTIFICATION STATEMENT

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS DOCUMENT AND THOSE ATTACHED HERETO ARE TRUE AND CORRECT. ALL WASTE TENDERED UNDER THIS WASTE PROFILE SHALL CONFORM TO THE SPECIFICATIONS ABOVE. TO THE BEST OF MY KNOWLEDGE, ALL KNOWN AND SUSPECTED HAZARDOUS COMPONENTS (40 CFR 261 .268) OF THIS WASTE STREAM HAVE BEEN IDENTIFIED ABOVE.

SIGNATURE J. Jakubiak TITLE Env. Administrator DATE 5/23/01

THE UNDERSIGNED CERTIFIES THAT HE/SHE OBTAINED A REPRESENTATIVE SAMPLE OF THE WASTE MATERIAL DESCRIBED ABOVE, AND THAT THE FOLLOWING REPRESENTATIONS ARE TRUE AND CORRECT.

SAMPLING METHOD: DRUM THIEF SAMPLE QUANTITY: 4 OZ. NAME: DON HUNT
SOURCE OF MATERIAL SAMPLED: CONTAINER DATE: 3/23/01

SCHN00246769

ENVIROTECH SYSTEMS INC
CHEMICAL INVENTORY

PAGE 1 OF 1

GENERATOR: Schnitzer Investment Corp
EPA ID#: ORD 099 155 574
LOCATION: Portland, Oregon
CHEMIST: Mike Jeffers
DATE: 05/07/01

LABPACK DRUM INVENTORY? (Y) N
DRUM NUMBER: SIC-L01
PROFILE NO.: 1344822
DOT CONTAINER: 4G - 10 GAL/(BOX)
DOT PROPER SHIPPING NAME: ~~Material Not Regulated by DOT~~
HAZARDOUS WASTE SOLID NOS
WASTE WEIGHT: 30 LBS
9 NA3077 PG III
GROSS WEIGHT: 50 LBS
HAZ CLASS NR
UN/NA
PG
RQ( )

ITEM #	DESCRIPTION (CHEMICAL & PHYSICAL)	WASTE CODES RCRA & STATE	HAZARD CLASS	PKG GRP	PHYS STATE	QTY	CONTAINER SIZE	TYPE	WASTE AMOUNT	RQ AMOUNT
	Atco Plastic Fiber-Seal contains	D039	NR		S	1	5 GAL	m	5 GAL	
	Asbestos, coal tar, perchloroethylene									

WA STATE WASTE CODE AND DESIGNATION: WL01/WL02 DW/EHW
RECEIVING STATE WASTE CODES:

M = metal, G = glass, P = plastic, CB = cardboard
Gal = gallon, QT = quart, PT = pint, L = liter, ml = milliliter, lb or # = pound, oz = ounce, g = gram, mg = milligram

SCHN00246770

ENVIROTECH SYSTEMS, INC.
3601121st STREET SW
LYNNWOOD, WA 98037
TELEPHONE: (206) 363-9000 FAX: (425) 513-5839

WASTE PRODUCT QUESTIONNAIRE

PROFILE ESI WPQ 01-124-10-LP

GENERATOR NAME: SCHNITZER STEEL
SITE ADDRESS: 12005 N. BURGARD ST.
PORTLAND , OR 97203

INVOICE TO: SCHNITZER STEEL
ADDRESS: P.O. BOX 10047
PORTLAND , OR 97296-0

DATE: 5/7/01
SIC CODE:
GEN EPA ID: ORD099155574
CONTACT: JIM JAKUBIAK
PHONE: 503-286-6976

WASTE PRODUCT DESCRIPTION AND CHARACTERISTICS

WASTE PRODUCT NAME: LAB PACK
PROCESS GENERATING WASTE: DISCARDING UNWANTED PRODUCT
SOURCE:
FORM:

ODOR
○ NONE ◉ MILD ○ STRONG
DESCRIBE: TAR

COLOR AND CLARITY
COLOR:
CLARITY:

PHYSICAL STATE AT 70F
◉ SOLID ○ SLUDGE
○ LIQUID ○ POWDER
AVERAGE CONSISTENCY:

TOXIC CATEGORIES PRESENT
WDOECONC:
WEIGHT:
TOXICCAT:

LAYERS
○ MULTI-LAYERED
○ BI-LAYERED
◉ HOMOGENOUS
FREE LIQUIDS: 100%

pH
○ <= 2 ○ 2 - 4 ○ 4.1 - 10 ○ 10.1 - 12.4 ○ >= 12.5 ○ EXACT: NA

DENSITY OR SPECIFIC GRAVITY
○ LIQUID lbs/gal
◉ SOLID lbs/ft3

FLASH POINT
○ < 73 F ◉ > 200 F ☐ CC ☐ EPA
○ 73 - 141 F ○ NO FLASH ☐ OC ☐ DOT
○ 142 - 199 F ○ EXACT:

CONSTITUENTS
CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL)

	%
LAB PACK:SEE ATTACHED INVENTORY SHEET	100

CHEMICAL NATURE
○ I
○ O
◉ I/O

GENERATOR HAS PROVIDED THE FOLLOWING
☐ SAMPLE ☑ MSDS ☐ WASTE ANALYSIS

METALS (PPM)
○ TOTAL ○ EPA TCLP
◉ GEN KNOWLEDGE

ARSENIC (As)	NS
BARIUM (Ba)	NS
CADMIUM (Cd)	NS
CHROMIUM (Cr)	NS
COPPER (Cu)	NS
LEAD (Pb)	NS
MERCURY (Hg)	NS
NICKEL (Ni)	NS
SELENIUM (Se)	NS
SILVER (Ag)	NS
ZINC (Zn)	NS
HEXCHROME	NS
OTHER	NS

SHIPPING INSTRUCTIONS
IS THIS A DOT HAZARDOUS MATERIAL
○ YES
◉ NO

DOT RQ
BULK LIQUID: ☐
BULK SOLID: ☐
DRUM/CONTAINER TYPE: UN4G 10 GAL BOX
VOLUME: 5 GALLONS

RCRA HAZ WASTE ☑ EXEMPT WASTE ☐
STATE ONLY WASTE ☐ TSCA ☐

WASHINGTON STATE DESIGNATION
○ EHW ○ EXEMPT ◉ DW

WASTE CODES
US EPA WASTE CODE D039
WA DOE WASTE CODES
CA WASTE CODES
OR WASTE CODES
SUBJECT TO LAND DISPOSAL RESTRICTIONS ☐

US DOT DESCRIPTION

PROPER SHIPPING NAME: , MATERIAL NOT REGULATED BY DOT
ADDITIONAL DESCRIPTION: (ASBESTOS, COAL TAR, PERCHLOROETHYLENE)
HAZARD CLASS: DOT ID NUMBER: PACKING GROUP NUMBER:

GENERATOR CERTIFICATION STATEMENT

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS DOCUMENT AND THOSE ATTACHED HERETO ARE TRUE AND CORRECT. ALL WASTE TENDERED UNDER THIS WASTE PROFILE SHALL CONFORM TO THE SPECIFICATIONS ABOVE. TO THE BEST OF MY KNOWLEDGE, ALL KNOWN AND SUSPECTED HAZARDOUS COMPONENTS (40 CFR 261 268) OF THIS WASTE STREAM HAVE BEEN IDENTIFIED ABOVE.

SIGNATURE X J. Jakubiak TITLE Exec. Administrator DATE 5/23/01

THE UNDERSIGNED CERTIFIES THAT HE/SHE OBTAINED A REPRESENTATIVE SAMPLE OF THE WASTE MATERIAL DESCRIBED ABOVE, AND THAT THE FOLLOWING REPRESENTATIONS ARE TRUE AND CORRECT.

SAMPLING METHOD: SAMPLE QUANTITY: NAME:
SOURCE OF MATERIAL SAMPLED: DATE:

CWM OF THE NORTHWEST
Federal EPA ID: ORD089452353
17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812

SCHNITZER STEEL PRODUCTS INC
ATTN: MANIFEST SECTION
ORD099155574
12005 N BURGARD ST
PORTLAND OR 97203-6422

CONFIRMATION OF DESTRUCTION

Chemical Waste Management, Inc. has received waste material from SCHNITZER STEEL PRODUCTS INC on 06/01/01 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 12448.

Profile Number: CS0476
CWM Tracking ID: 35817602
Process: CHEMICAL FIXATION
Treatment Date: 06/06/01

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

LYNN MURRILL
RECORDS MANAGER
Certificate # 89135
06/13/01

358176

NDR

Emergency Contact Telephone Number

(206) 363-9000 OR (425) 771-0452

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. O.R.D.0.9.9.1.5.5.7.4.

Manifest Document No. 12448.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
SCHNITZER STEEL
P.O. BOX 10047
PORTLAND, OR 97296

SITE ADDRESS: SCHNITZER STEEL
12005 N. BURGARD ST.
PORTLAND, OR 97203

4. Generator's Phone (503) 286-6944

ATTN: TIM TODD/J JAKUBI

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name
ENVIROTECH SYSTEMS, INC.

6. US EPA ID Number
W.A.H.0.0.0.1.2.4.5.0.

C. State Transporter's ID

D. Transporter's Phone (206) 363-9000

7. Transporter 2 Company Name
Tri-State Motor Transit

8. US EPA ID Number
M.O.D.0.9.5.0.3.8.9.9.8

E. State Transporter's ID

F. Transporter's Phone 800-826-2953

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT
OF THE NORTHWEST
17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812

10. US EPA ID Number
O.R.D.0.8.9.4.5.2.3.5.3.

G. State Facility's ID

H. Facility's Phone (541) 454-2643

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.		MATERIAL NOT REGULATED BY DOT WASHINGTON STATE DANGEROUS WASTE ONLY (PERSISTENT	001	DF	00052	G	WT02 WP01 YCD7 SRS 6-5-01
b.		MATERIAL NOT REGULATED BY DOT	002	DF	00060	G	YD04 SRS 6-5-01
c.							
d.							

J. Additional Descriptions for Materials Listed Above
A. CWM#CS0467, ES1#01-124-10-01
B. CWM#CS0476, ES1#01-124-10-08

K. Handling Codes for Wastes Listed Above
CERTIFICATE OF DISPOSAL REQUIRED

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Jim Jakubcak — Signature: [signature] — Month Day Year: 5 23 01

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: SCOTT R. LINDSAY — Signature: [signature] — Month Day Year: 05 23 01

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: KEN SHEPHERD — Signature: [signature] — Month Day Year: 06 01 01

FACILITY

19. Discrepancy Indication Space
Section 11a, 11b added waste codes per Leonard Warnock/Envirotech. SRS 6-5-01

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Nicole D. Rouska — Signature: Nicole Rouska — Month Day Year: 06 01 01

ORIGINAL - RETURN TO GENERATOR

BMS

SCHN00246773

UNIFORM HAZARDOUS WASTE MANIFEST AND INSTRUCTIONS EPA FORM 8700-22

U.S. EPA Form 8700-22

Read all instructions before completing this form.

This form has been designed for use on a 12-pitch (elite) typewriter; a firm point pen may also be used – press down hard.

Federal regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation.

Federal regulations also require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage and disposal facilities to complete the following information:

GENERATORS

Item 1. Generator's U.S. EPA ID Number – Manifest Document Number

Enter the generator's U.S. EPA twelve digit identification number and the unique five digit number assigned to this Manifest (e.g., 00001) by the generator.

Item 2. Page 1 of –

Enter the total number of pages used to complete this Manifest, i.e., the first page (EPA Form 8700-22) plus the number of Continuation Sheets (EPA Form 8700-22A), if any.

Item 3. Generator's Name and Mailing Address

Enter the name and mailing address of the generator. The address should be the location that will manage the returned Manifest forms.

Item 4. Generator's Phone Number

Enter a telephone number where an authorized agent of the generator may be reached in the event of an emergency.

Item 5. Transporter 1 Company Name

Enter the company name of the first transporter who will transport the waste.

Item 6. U.S. EPA ID Number

Enter the U.S. EPA twelve digit identification number of the first transporter identified in Item 5.

Item 7. Transporter 2 Company Name

If applicable, enter the company name of the second transporter who will transport the waste. If more than two transporters are used to transport the waste, use a Continuation Sheet(s) (EPA Form 8700-22A) and list the transporters in the order they will be transporting the waste.

Item 8. U.S. EPA ID Number

If applicable, enter the U.S. EPA twelve digit identification number of the second transporter identified in Item 7.

Note.–If more than two transporters are used, enter each additional transporter's company name and U.S. EPA twelve digit identification number in Items 24-27 on the Continuation Sheet (EPA Form 8700-22A). Each Continuation Sheet has space to record two additional transporters. Every transporter used between the generator and the designated facility must be listed.

Item 9. Designated Facility Name and Site Address

Enter the company name and site address of the facility designated to receive the waste listed on this Manifest. The address must be the site address, which may differ from the company mailing address.

Item 10. U.S. EPA ID Number

Enter the U.S. EPA twelve digit identification number of the designated facility identified in Item 9.

Item 11. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number (UN/NA))

Enter the U.S. DOT Proper Shipping Name, Hazard Class, and ID Number (UN/NA) for each waste as identified in 49 CFR 171 through 177.

Note.–If additional space is needed for waste descriptions, enter these additional descriptions in Item 28 on the Continuation Sheet (EPA Form 8700-22A).

Item 12. Containers (No. and Type)

Enter the number of containers for each waste and the appropriate abbreviation from Table I (below) for the type of container.

Table I – Types of Containers

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
TP = Tanks portable	CF = Fiber or plastic boxes, cartons, cases
TT = Cargo tanks (tank trucks)	BA = Burlap, cloth, paper or plastic bags
TC = Tank cars	
DT = Dump truck	

Item 13. Total Quantity

Enter the total quantity of waste described on each line.

Item 14. Unit (Wt./Vol.)

Enter the appropriate abbreviation from Table II (below) for the unit of measure.

Table II – Units of Measure

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. Special Handling Instructions and Additional Information

Generators may use this space to indicate special transportation, treatment, storage, or disposal information or Bill of Lading information. States may not require additional, new, or different information in this space. For international shipments, generators must enter in this space the point of departure (City and State) for those shipments destined for treatment, storage, or disposal outside the jurisdiction of the United States.

Item 16. Generator's Certification

The generator must read, sign (by hand), and date the certification statement. If a mode *other than* highway is used, the word "highway" should be lined out and the appropriate mode (rail, water, or air) inserted in the space below. If another mode *in addition to* the highway mode is used, enter the appropriate additional mode (e.g., *and rail*) in the space below.

Primary exporters shipping hazardous wastes to a facility located outside of the United States must add to the end of the first sentence of the certification the following words "and conforms to the terms of the EPA Acknowledgment of Consent to the shipment."

In signing the waste minimization certification statement, those generators who have not been exempted by statute or regulation from the duty to make a waste minimization certification under section 3002(b) of RCRA are also certifying that they have complied with the waste minimization requirements.

Generators may preprint the words, "On behalf of" in the signature block or may hand write this statement on the signature block prior to signing the generator certifications.

Note.–All of the above information *except* the handwritten signature required in Item 16 may be preprinted.

TRANSPORTERS

Item 17. Transporter 1 Acknowledgement of Receipt of Materials

Enter the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Item 18. Transporter 2 Acknowledgement of Receipt of Materials

Enter, if applicable, the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Note.–International Shipments – Transporter Responsibilities.

Exports–Transporters must sign and enter the date the waste left the United States in Item 15 of Form 8700-22.

Imports–Shipments of hazardous waste regulated by RCRA and transported into the United States from another country must upon entry be accompanied by the U.S. EPA Uniform Hazardous Waste Manifest. Transporters who transport hazardous waste into the United States from another country are responsible for completing the Manifest (40 CFR 263.10(c)(1)).

OWNERS AND OPERATORS OF TREATMENT, STORAGE, OR DISPOSAL FACILITIES

Item 19. Discrepancy Indication Space

The authorized representative of the designated (or alternate) facility's owner or operator must note in this space any significant discrepancy between the waste *described on the Manifest and the waste actually received at the facility.*

Owners and operators of facilities located in unauthorized States (i.e., the U.S. EPA administers the hazardous waste management program) who cannot resolve significant discrepancies within 15 days of receiving the waste must submit to their Regional Administrator (see list below) a letter with a copy of the Manifest at issue describing the discrepancy and attempts to reconcile it (40 CFR 264.72 and 265.72).

Owners and operators of facilities located in authorized States (i.e., those States that have received authorization from the U.S. EPA to administer the hazardous waste program) should contact their State agency for information on State Discrepancy Report requirements.

EPA Regional Administrators

Regional Administrator, U.S. EPA Region I, J.F. Kennedy Fed. Bldg., Boston, MA 02203

Regional Administrator, U.S. EPA Region II, 26 Federal Plaza, New York, NY 10278

Regional Administrator, U.S. EPA Region III, 6th and Walnut Sts., Philadelphia, PA 19106

Regional Administrator, U.S. EPA Region IV, 345 Courtland St., NE., Atlanta, GA 30365

Regional Administrator, U.S. EPA Region V, 230 S. Dearborn St., Chicago, IL 60604

Regional Administrator, U.S. EPA Region VI, 1201 Elm Street, Dallas, TX 75270

Regional Administrator, U.S. EPA Region VII, 324 East 11th Street, Kansas City, MO 64106

Regional Administrator, U.S. EPA Region VIII, 1860 Lincoln Street, Denver, CO 80295

Regional Administrator, U.S. EPA Region IX, 215 Freemont Street, San Francisco, CA 94105

Regional Administrator, U.S. EPA Region X, 1200 Sixth Avenue, Seattle, WA 98101

Item 20. Facility Owner or Operator: Certification of Receipt of Hazardous Materials Covered by This Manifest Except as Noted in Item 19

Print or type the name of the person accepting the waste on behalf of the owner or operator of the facility. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Items A-K are not required by Federal regulations for intra- or interstate transportation. However, States may require generators and owners or operators of treatment, storage, or disposal facilities to complete some or all of items A-K as part of State manifest reporting requirements. Generators and owners and operators of treatment, storage, or disposal facilities are advised to contact State officials for guidance on completing the shaded areas of the Manifest.

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street SW., Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office Management and Budget, Washington, DC 20503.

CWM OF THE NORTHWEST
Federal EPA ID: ORD089452353
17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812

SCHNITZER STEEL PRODUCTS INC
ATTN: MANIFEST SECTION
ORD099155574
12005 N BURGARD ST
PORTLAND OR 97203-6422

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. has received waste material from SCHNITZER STEEL PRODUCTS INC on 06/01/01 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 12448.

Profile Number: CS0467
CWM Tracking ID: 35817601
Process: LANDFILL
Treatment Date: 06/06/01

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

LYNN MURRILL
RECORDS MANAGER
Certificate # 89116
06/13/01

Arkansas Department of Environmental Quality
Hazardous Waste Division
P.O. Box 8913, Little Rock, AR 72219-8913
Telephone: (501) 682-0833

1

Please print or type. *(Form designed for use on elite (12-pitch) typewriter.)* *Form Approved. OMB No. 2050-0039*

AR-2-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ORD099155574
Manifest Document No.: 12447
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
SCHNITZER STEEL
P.O. BOX 10047
PORTLAND, OR 97296
SITE ADDRESS: SCHNITZER STEEL
12005 N. BURGARD ST
PORTLAND, OR 97203
ATTN: TIM TODD/J JAKUBI

A. State Manifest Document Number: AR- 1218159
B. State Generator's ID:

4. Generator's Phone (503) 286-6944

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC.
6. US EPA ID Number: WAH000012450
C. State Transporter's ID: H- (206) 363-9000
D. Transporter's Phone:

7. Transporter 2 Company Name: TRIAD TRANSPORT, INC.
8. US EPA ID Number: OKD981588791
E. State Transporter's ID: H- 377
F. Transporter's Phone: 800-364-1139

9. Designated Facility Name and Site Address
ENSCO
AMERICAN OIL ROAD
EL DORADO, AR 71730
10. US EPA ID Number: ARD069748192
G. State Facility's ID:
H. Facility's Phone: 8708637173

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CORROSIVE LIQUID, INORGANIC, N.O.S. (SODIUM HYDROXIDE) 8 UN3266 PG II DOTE 11153	001	DF	000 ~~16~~ 10 SOL 5/23/01	G	D002
b. ~~MATERIAL NOT REGULATED BY DOT (ASBESTOS, COAL TAR, PERCHLOROETHYLENE)~~	~~001~~	~~CF~~	~~000.50~~	~~P~~	~~D039~~
c. HAZARDOUS WASTE SOLID NOS 9 NA3077 PG III	001	CF	000.50	P	D039
d.					

J. Additional Description for Materials Listed Above
A. WMDS#1344821, ESI#01-124-10-04, ERG#154
~~B. WMDS#1344822, DM#SIC-L01, WASTE WT30#~~
C. WMDS#1344822, DM#SIC-L01, WASTE WT30#
if no alternate TSDF, return to generator 140

K. Emergency Response Information:

15. Special Handling Instructions and Additional Information
EMERGENCY INFORMATION CONTACT (206) 363-9000 OR (425) 771-0452.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labeled/placarded, and are in all respects in proper condition for transport by highway according to applicable International and national government regulations and Arkansas state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: X Jim Jakubiak
Signature: X J Jakubiak
Month Day Year: 05 23 01

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: SCOTT R. LINDSAY
Signature: [signature]
Month Day Year: 05 23 01

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: TRIAD Jerry Southwood
Signature: [signature]
Month Day Year: 05 30 01

19. Discrepancy Indication Space
11b. None shipped SRS 5/23/01

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: CATHY LAUHE
Signature: Cathy Lauhe
Month Day Year: 06 13 01

GENERATOR / TRANSPORTER / FACILITY

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

SCHN00246779

COLUMBIA RIDGE LANDFILL & RECYCLING CENTER
A WASTE MANAGEMENT COMPANY

18177 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2030
(541) 454-3312 Fax

June 22, 2001

Envirotech Systems, Inc.
3601 121st St. SW
Lynnwood, WA 98037

CERTIFICATE OF DISPOSAL

Oregon Waste Systems, Inc. has received NON HAZARDOUS Waste material from Envirotech Systems Inc. on behalf of Schnitzer.

Date of Disposal:	June 22, 2001
Manifest #'s:	122449
Profile #:	549942
Pounds Disposed:	220 lbs.
Waste Type:	Out dated Grease

I certify, on behalf of the above listed facility, that to the best of my knowledge the above-described non-hazardous waste was managed in compliance with all applicable laws.

Carrie A. Burres

Carrie A. Burres
Special Waste Billing Department

Please print or type. (Form designed for use on elite (12 pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ORD099155574

Manifest Document No. 12449

2. Page 1 of 1

GENERATOR

3. Generator's Name and Mailing Address
SCHNITZER STEEL
P.O. BOX 10047
PORTLAND, OR 97296

SITE ADDRESS: SCHNITZER STEEL
12005 N. BURGARD ST.
PORTLAND, OR 97203
ATTN: TIM TODD/JAKUBI

4. Generator's Phone (503) 286-6944

5. Transporter 1 Company Name
ENVIROTECH SYSTEMS, INC.

6. US EPA ID Number WAH000012450

A. Transporter's Phone (206) 363-9000

7. Transporter 2 Company Name
Tr. State Motor Transit

8. US EPA ID Number MOD095039998

B. Transporter's Phone 800-826-2953

9. Designated Facility Name and Site Address
COLUMBIA RIDGE LANDFILL
18177 CEDAR SPRINGS LANE
ARLINGTON, OR 97812

10. US EPA ID Number ORD987173457

C. Facility's Phone 5414543282

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. MATERIAL NOT REGULATED BY D.O.T. (SOLID GREASE)	00.40	M	00220	G
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A. CRL# , ESI#01-124-10-02
549942

E. Handling Codes for Wastes Listed Above
CERTIFICATE OF DISPOSAL REQUIRED

15. Special Handling Instructions and Additional Information

EMERGENCY INFORMATION CONTACT (206) 363-9000 OR (425) 771-0452.

"Shippers Certification per 49CFR 172.204 - This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. Signature in box 16 of this manifest constitutes certification of this statement by the shipper."

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name: Jim Jakubik | Signature | Month 05 Day 23 Year 01

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: SCOTT R. LINDSAY | Signature | Month 05 Day 23 Year 01

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: REN SHEPHERD | Signature | Month 05 Day 01 Year 01

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Garrett Barnes | Signature | Month 06 Day 01 Year 01

Printed by J. J. KELLER & ASSOCIATES, INC. Neenah, WI 54957-0368

ORIGINAL - RETURN TO GENERATOR

12-BLC-M5

Nicole Rauska 06-01-01

SCHN00246783

COLUMBIA RIDGE LANDFILL & RECYCLING CENTER
A WASTE MANAGEMENT COMPANY

18177 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2030
(541) 454-3312 Fax

July 10, 2001

Envirotech Systems, Inc.
3601 121st St. SW
Lynnwood, WA 98037

CERTIFICATE OF DISPOSAL

Oregon Waste Systems, Inc. has received NON HAZARDOUS Waste material from Schnitzer on behalf of Envirotech Systems, Inc.

Date of Disposal:	July 10, 2001
Manifest #'s:	12887
Profile #:	0040CU
Pounds Disposed:	1500 lbs.
Waste Type:	Unused Products

I certify, on behalf of the above listed facility, that to the best of my knowledge the above-described non-hazardous waste was managed in compliance with all applicable laws.

Carrie A. Burres

Carrie A. Burres
Special Waste Billing Department

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ORD099155574
Manifest Document No. 12887
2. Page 1 of 1

GENERATOR

3. Generator's Name and Mailing Address
SCHNITZER STEEL
P.O. BOX 10047
PORTLAND, OR 97296
SITE ADDRESS: SCHNITZER STEEL
P.O. BOX 10047
PORTLAND, OR 97296
ATTN: TIM TODD/J JAKUBI
4. Generator's Phone (503) 286-6944

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC.
6. US EPA ID Number: WAH000012450
A. Transporter's Phone: (206) 363-9000

7. Transporter 2 Company Name: TRI STATE MOTOR TRANSIT
8. US EPA ID Number: MOD009503898
B. Transporter's Phone: 800 234 8768

9. Designated Facility Name and Site Address
COLUMBIA RIDGE LANDFILL
18177 CEDAR SPRINGS LANE
ARLINGTON, OR 97812
10. US EPA ID Number: ORD987173457
C. Facility's Phone: 5414543282

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. MATERIAL NOT REGULATED BY DOT	001	CF	8.15.00	P
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A. GRL#0040CU, ESI#01-149-16

E. Handling Codes for Wastes Listed Above
CERTIFICATE OF DISPOSAL REQUIRED

15. Special Handling Instructions and Additional Information
EMERGENCY INFORMATION CONTACT (206) 363-9000 OR (425) 771-0452.
"Shippers Certification per 49CFR 172.204 - This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. Signature in box 16 of this manifest constitutes certification of this statement by the shipper."

16. **GENERATOR'S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.
Printed/Typed Name: GLORIA CHRISTIAN
Signature: G. CHRISTIAN
Month 06 Day 21 Year 01

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: SCOTT K. LINDSAY
Signature:
Month 06 Day 21 Year 01

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: KEN SHEPHERD
Signature:
Month 06 Day 22 Year 01

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Angela Timmerman
Signature: Angela Timmerman
Month 07 Day 11 Year 01

Portland Blueprint & Office Supply, Inc.
Neenah, WI 54957-0384

ORIGINAL - RETURN TO GENERATOR

12 HLC-M5

Nicolas Rousska 6/25/01

SCHN00246785

Please print or type
(Form designed for use on elite (12-pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ORD099155574

Manifest Document No. 12887

2. Page 1 of 1

3. Generator's Name and Mailing Address
SCHNITZER STEEL
P.O. BOX 10047
PORTLAND, OR 97296

SITE ADDRESS: SCHNITZER STEEL
P.O. BOX 10047
PORTLAND, OR 97296
ATTN: TIM TODD/J JAKUB

4. Generator's Phone (503) 286-6944

5. Transporter 1 Company Name
ENVIROTECH SYSTEMS, INC.

6. US EPA ID Number
WAH000012450

A. Transporter's Phone (206) 363-9000

7. Transporter 2 Company Name

8. US EPA ID Number

B. Transporter's Phone

9. Designated Facility Name and Site Address
COLUMBIA RIDGE LANDFILL
18177 CEDAR SPRINGS LANE
ARLINGTON, OR 97812

10. US EPA ID Number
ORD987173457

C. Facility's Phone
5414543282

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. MATERIAL NOT REGULATED BY DOT	001	CF	6150.0	P
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A. CRL#0040CU, ESI#01-149-16

E. Handling Codes for Wastes Listed Above
CERTIFICATE OF DISPOSAL REQUIRED

15. Special Handling Instructions and Additional Information
EMERGENCY INFORMATION CONTACT (206) 363-9000 OR (425) 771-0452
"Shippers Certification per 48CFR 172.204 - This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. Signature in box 16 of this manifest constitutes certification of this statement by the shipper."

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
X Gloria Christiani	X G Christiani	06	21	01

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Scott K Lindsay	[signature]	06	21	01

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

GENERATOR

TRANSPORTER

FACILITY

Printed by J. J. KELLER & ASSOCIATES, INC.
Neenah, WI 54957-0368

GENERATOR'S COPY

12-BLC-M5

SCHN00246786

ENVIROTECH SYSTEMS, INC.
3601121st STREET SW
LYNNWOOD, WA 98037
TELEPHONE: (206) 363-9000 FAX: (425) 513-5839

WASTE PRODUCT QUESTIONNAIRE

PROFILE ESI WPQ 01-149-16

GENERATOR NAME: SCHNITZER STEEL
INVOICE TO: SCHNITZER STEEL
DATE: 6/12/01
SIC CODE:
SITE ADDRESS: 12005 N. BURGARD ST.
PORTLAND, OR 97203
ADDRESS: P.O. BOX 10047
PORTLAND, OR 97296-
GEN EPA ID: ORD099155574
CONTACT: JIM JAKUBIAK
PHONE: 503-286-6976

WASTE PRODUCT DESCRIPTION AND CHARACTERISTICS

WASTE PRODUCT NAME: KNIFE GRADE GLAZING PUTTY
SOURCE:
PROCESS GENERATING WASTE: DISPOSAL OF UNUSED PRODUCT
FORM:

ODOR
(●) NONE ( ) MILD ( ) STRONG
DESCRIBE:

COLOR AND CLARITY
COLOR: VARIES
CLARITY:

PHYSICAL STATE AT 70F
(●) SOLID ( ) SLUDGE
( ) LIQUID ( ) POWDER
AVERAGE CONSISTENCY:

TOXIC CATEGORIES PRESENT
WDOECONC:
WEIGHT:
TOXICCAT:

LAYERS
( ) MULTI-LAYERED
( ) BI-LAYERED
(●) HOMOGENOUS
FREE LIQUIDS: 0

pH
( ) <= 2 ( ) 10.1 - 12.4
( ) 2 - 4 ( ) >= 12.5
( ) 4.1 - 10 ( ) EXACT:
NA

DENSITY OR SPECIFIC GRAVITY
1.2 - 1.5
( ) LIQUID lbs/gal
(●) SOLID lbs/ft3

FLASH POINT
( ) < 73 F ( ) > 200 F ☐ CC ☐ EPA
( ) 73 - 141 F (●) NO FLASH ☐ OC ☐ DOT
( ) 142 - 199 F ( ) EXACT:

CONSTITUENTS
CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL)

	%
ROCK DUST (NON-ASBESTOS)	90-100
LINSEED OIL	0-10
SOYBEAN OIL	0-10

CHEMICAL NATURE
( ) I
( ) O
(●) I/O

METALS (PPM)
( ) TOTAL ( ) EPA TCLP
(●) GEN KNOWLEDGE

ARSENIC (As)	NS
BARIUM (Ba)	NS
CADMIUM (Cd)	NS
CHROMIUM (Cr)	NS
COPPER (Cu)	NS
LEAD (Pb)	NS
MERCURY (Hg)	NS
NICKEL (Ni)	NS
SELENIUM (Se)	NS
SILVER (Ag)	NS
ZINC (Zn)	NS
HEXCHROME	NS
OTHER	

GENERATOR HAS PROVIDED THE FOLLOWING
☐ SAMPLE ☑ MSDS ☐ WASTE ANALYSIS

SHIPPING INSTRUCTIONS
IS THIS A DOT HAZARDOUS MATERIAL
( ) YES
(●) NO
DOT RQ
BULK LIQUID: ☐
BULK SOLID: ☐
DRUM/CONTAINER TYPE: UN1A2 5 GAL DM
VOLUME: 28 PAILS/PALLET

RCRA HAZ WASTE ☐ EXEMPT WASTE ☐
STATE ONLY WASTE ☐ TSCA ☐

WASHINGTON STATE DESIGNATION
( ) EHW ( ) EXEMPT ( ) DW

WASTE CODES
US EPA WASTE CODE
WA DOE WASTE CODES
CA WASTE CODES
OR WASTE CODES
SUBJECT TO LAND DISPOSAL RESTRICTIONS ☐

US DOT DESCRIPTION
PROPER SHIPPING NAME: MATERIAL NOT REGULATED BY DOT
ADDITIONAL DESCRIPTION:
HAZARD CLASS: DOT ID NUMBER: PACKING GROUP NUMBER:

GENERATOR CERTIFICATION STATEMENT
I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS DOCUMENT AND THOSE ATTACHED HERETO ARE TRUE AND CORRECT. ALL WASTE TENDERED UNDER THIS WASTE PROFILE SHALL CONFORM TO THE SPECIFICATIONS ABOVE. TO THE BEST OF MY KNOWLEDGE, ALL KNOWN AND SUSPECTED HAZARDOUS COMPONENTS (40 CFR 261 .268) OF THIS WASTE STREAM HAVE BEEN IDENTIFIED ABOVE.

SIGNATURE X A Christian TITLE Traffic Coord/Office mgr DATE 6-27-01

THE UNDERSIGNED CERTIFIES THAT HE/SHE OBTAINED A REPRESENTATIVE SAMPLE OF THE WASTE MATERIAL DESCRIBED ABOVE, AND THAT THE FOLLOWING REPRESENTATIONS ARE TRUE AND CORRECT.

SAMPLING METHOD: SAMPLE QUANTITY: NAME:
SOURCE OF MATERIAL SAMPLED: DATE:

WORK ORDER

ENVIROTECH SYSTEMS, INC.
3601 121st STREET SW
LYNNWOOD, WA 98037
(206) 363-9000

FOR ACCOUNT

WORK ORDER NUMBER: 12887

WORK ORDER DATE: Jun 18, 2001

Page: 1

SOLD TO:
SCHNITZER ~~INVESTMENT CORP~~ STEEL
P.O. BOX 10047
PORTLAND, OR 97296-0047

SITE:
SCHNITZER STEEL
12005 N. BURGARD ST.
PORTLAND, OR 97203

PHONE: (503) 286-6976

SITE PHONE:

CUSTOMER NUMBER	PO NUMBER	ESI JOB #	ACCOUNT REP
SCHSTEPOR		01-149-16	OREGON
CUSTOMER CONTACT	EPA ID #	DATE ORDERED	DATE COMPLETED
J. JAKUBIAK	ORD099166674	6/18/01	6/21/01

DESCRIPTION / MANIFEST #	QUANTITY	SIZE	TAX	UNIT PRICE	EXTENSION
REMOVE, TRANSPORT AND REUSE/RECYCLE/DISPOSE OF:					
PALLET KNIFE GRADE GLAZING PUTTY/12887A	1.00	EA	N		ON ACCOUNT
PROFILE, FACILITY APPROVAL OF KNIFE GRADE GLAZING PUTTY/01-149-16	1.00				

WORK AUTHORIZATION

The undersigned hereby authorizes and acknowledges receipt of the materials and /or commencement of services described above on behalf of the party indicated as "SOLD TO" above (Generator). On behalf of Generator, I hereby make and appoint Envirotech Systems, Inc. Generator's true and lawful agent for the purpose of managing the above waste responsibilities. I understand that this does not relieve Generator of its responsibilities as a generator even though title of the waste transfers to Envirotech Systems, Inc.. Prices quoted herein are subject to the waste's inspection and acceptance at the destination waste management facility.

BY: J. Christian DATE: 6-21-01

SCHN00246788

NDR

358451

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ORD099155574

Manifest Document No. 12927

2. Page 1 of 1

3. Generator's Name and Mailing Address
SCHNITZER STEEL
P.O. BOX 10047
PORTLAND, OR 97296

SITE ADDRESS: SCHNITZER STEEL
12005 N. BURGARD ST.
PORTLAND, OR 97203
ATTN: TIM TODD/JAKUB

4. Generator's Phone (503) 286-6944

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC.

6. US EPA ID Number: WAH000012450

A. Transporter's Phone: (206) 363-9000

7. Transporter 2 Company Name: TIT STATE MOTOR TRANSIT

8. US EPA ID Number: MOD095038998

B. Transporter's Phone: 800 234 8768

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST
17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812

10. US EPA ID Number: ORD089452353

C. Facility's Phone: (541) 454-2643

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. BATTERIES, DRY, CONTAINING POTASSIUM HYDROXIDE, SOLID 8 UN3028 PG III	001	DM	00300	P
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A. GWM#GU1553, ESI#01-169-14, ERG 154, X004

E. Handling Codes for Wastes Listed Above
CERTIFICATE OF DISPOSAL REQUIRED

15. Special Handling Instructions and Additional Information
EMERGENCY INFORMATION CONTACT (206) 363-9000 OR (425) 771-0452.
"Shippers Certification per 49CFR 172.204 - This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. Signature in box 16 of this manifest constitutes certification of this statement by the shipper."

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Gloria Christian	G. Christian	06	27	01

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Scott R. Lindsay	[illegible]	06	27	01

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Ken Shepherd	[illegible]	06	27	01

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Nicole D. Rouska	Nicole D. Rouska	06	25	01

GENERATOR

TRANSPORTER

FACILITY

Connelly-GPM, Inc. - Keeler & Associates, Inc.
Nashville, TN 64867-0088

ORIGINAL - RETURN TO GENERATOR

BMS

12-BLC-M5

SCHN00246789

CWM OF THE NORTHWEST
Federal EPA ID: ORD089452353
17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812

SCHNITZER STEEL PRODUCTS INC
ATTN: MANIFEST SECTION
ORD099155574
12005 N BURGARD ST
PORTLAND OR 97203-6422

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. has received waste material from SCHNITZER STEEL PRODUCTS INC on 06/25/01 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 12927.

Profile Number: CU1553
CWM Tracking ID: 35845101
Process: LANDFILL
Treatment Date: 06/29/01

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Becky Sumner

LYNN MURRELL
RECORDS MANAGER
Certificate # 89706
07/05/01

Please print or type
(Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ORD009159574
Manifest Document No. 12027
2. Page 1 of 1

3. Generator's Name and Mailing Address
SCHNITZER STEEL
P.O. BOX 10047
PORTLAND, OR 97296
SITE ADDRESS: SCHNITZER STEEL
1200 N. BURGARD ST.
PORTLAND, OR 97203
ATTN: TIM TOUDO JAKUB
4. Generator's Phone (503) 286-8944

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC.
6. US EPA ID Number: WAH000012450
A. Transporter's Phone: (206) 353-9000

7. Transporter 2 Company Name
8. US EPA ID Number
B. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT
OF THE NORTHWEST
17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812
10. US EPA ID Number: ORD089452353
C. Facility's Phone: (541) 454-2043

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. BATTERIES, DRY, CONTAINING POTASSIUM HYDROXIDE, SOLID 8 UN3028 PG III	001	Dm	0.300	P
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A. CONTAINS 533, ERG 801-169-14, ERG 134, 8004

E. Handling Codes for Wastes Listed Above
CERTIFICATE OF DISPOSAL REQUIRED

15. Special Handling Instructions and Additional Information
EMERGENCY INFORMATION CONTACT (206) 353-9000 OR (425) 771-0432.
"Shippers Certification per 49CFR 172.204 - This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. Signature in box 16 of this manifest constitutes certification of this statement by the shipper."

GENERATOR

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.
Printed/Typed Name: KATHERINE CHRISTIAN
Signature: K. Y. CHRISTIAN
Month 06 Day 21 Year 01

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: SCOTT R. LINDSAY
Signature
Month 06 Day 21 Year 01

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Month Day Year

PRINTED BY J. KELLER & ASSOCIATES, INC.
Neenah, WI 54957-0368

GENERATOR'S COPY

12-BLC-M5

SCHN00246791

Registration Verification Report 2000

3 *1711

1. DEQ ID No: ORD099155574 Name: Schnitzer Steel Products Co
Location: ~~10350 N TIME OIL RD.~~ 12005 North Burgard Rd
PORTLAND, OR 97203-6422
Site Contact Name: James Jakubiak Site Contact Phone: (503) 286-6976

Current information, if different from above:

Your Standard Industrial Classification (SIC) code is currently:
5093: Scrap And Waste Materials

Current code if different:

DEQ
State of Oregon Department of Environmental Quality

Your current employee count is listed as: 99 Please indicate the correct count if it has changed: 99

Verify the information in the left column, and make any corrections in the right column:

The owner of Schnitzer Steel Products Co is:

2. Indvidual or Organization: Schnitzer Steel Industries Address: PO Box 10047 Portland, OR 97296-0047 Phone: 503 224 9900	Indvidual or Organization: Address: Phone:

The owner of the property on which Schnitzer Steel Products Co is located is:

3. Individual or Organization: NW Pipe Co Address: 12005 N Burgard Portland, OR 97203 Phone: 503 285 1400	Individual or Organization: Schnitzer Investment Corp. Site Contact: Linda Wakefield Address: P.O. Box 10047 Portland, OR. 97296-0047 Phone: (503) 224-9900

The address for DEQ to send hazardous waste information to Schnitzer Steel Products Co is:

4. Forms Contact: Jim Jakubiak Organization: Schnitzer Steel Industries Inc Address: PO Box 10047 Portland, OR 97296-0047 Internet E-Mail: Data missing, please update Phone: 503 286-6976	Forms Contact: Organization: Address: Internet E-Mail: Phone:

The address for DEQ to send hazardous waste fee invoices for Schnitzer Steel Products Co is:

5. Fee Contact: Jim Jakubiak Organization: Schnitzer Steel Industries Inc Address: PO Box 10047 Portland, OR 97296-0047 Phone: 503 286-6976	Fee Contact: Organization: Address: Phone:

Hazardous waste generator status:

6. Schnitzer Steel Products Co last reported as a Conditionally Exempt Generator on the 1999 Annual Report.
What was the generator status for Schnitzer Steel Products Co in 2000, based on monthly generation records?

☐ Large Quantity Generator ☐ Small Quantity Generator ☒ Conditionally Exempt Generator

01/03/2001

SCHN00246795

7. If the information for this facility has changed from what is preprinted in Box 1 from the front of this form, then check all that apply. If no changes occurred, then skip to Box 8.

- ☐ The business (as preprinted) is no longer active at this location. We are a different company or a company new to this location. Date we opened for business: _____
- ☐ The business is the same; we have a new name.
- ☒ The location and name of the business has not changed. The local government modified the address.
- ☐ The business moved to a new location. ☐ I wish to apply for a new site-specific DEQ/EPA ID Number for the company's new location.

8. Has the ownership of this facility changed from what is preprinted in Box 2 from the front of this form?

☐ **Yes** (If yes, Answer Questions 8a-8b) ☒ **No** (Skip to Box 9)

8a. What was the date of the ownership change? _____

8b. Are you completing this report for:

- ☐ The previous (preprinted name) company up to the time of closure? (Complete Box 9.)
- ☐ The current (new) company?
- ☐ Filing for the full calendar year?
- ☐ Filing for only that part of the year following purchase?

9. Indicate one of the following:

- ☒ I wish to keep the assigned DEQ/EPA Identification Number Active. (Skip to Box 10)
- ☐ I wish to cancel the assigned DEQ/EPA Identification Number because this facility does not generate or manage hazardous waste for the following reason (**Date must be provided**):
  - ☐ Closure of business (Date of Closure: _____)
  - ☐ Completion of a one-time cleanup and waste management activity (Date Completed: _____)
  - ☐ Change in business activity (Explain and Provide Date: _____ _____)
  - ☐ Other (Explain and Provide Date: _____ _____)

Note: The DEQ/EPA Identification Number is assigned to the physical location of the site and cannot be reassigned to a different location. The ID number is required for certain facilities such as: Hazardous Waste (HW) Transporters; Large Quantity HW Generators; Small Quantity HW Generators; Treatment, Storage, Disposal Facilities; HW Recycling Facilities; Marketers or Burners of HW Fuel; and facilities that engaged in some Used Oil or Universal Waste Activities. Conditionally Exempt Generators may also need an ID number for certain waste management activities.

10. ***I certify** under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.*

James L. Jakubiak — March 14, 2001

Signature — Date

James L. Jakubiak — Environmental Administrator

Name (please print) — Title

Mail completed form to:
Oregon DEQ
Waste Prevention & Management Division
Attn: Hazardous Waste Forms Clerk
811 SW Sixth Avenue
Portland, OR 97204-1390

***Remember:** If you were a small or large quantity generator during any part of 2000, you must complete the Waste Generation & Management Answer Sheets and attach them to this form. If filing Answer Sheets electronically, an Electronic Certification must be attached.*

Questions: (503) 229-5470 or (800) 452-4011 or visit our Website at www.deq.state.or.us/wmc/hw/hwrptonlineforms.htm

Oregon
John A. Kitzhaber, M.D., Governor

Department of Environmental Quality
811 SW Sixth Avenue
Portland, OR 97204-1390
(503) 229-5696
TTY (503) 229-6993

January 5, 2001

1711*RVR:197212
Hazardous Waste Coordinator
Schnitzer Steel Industries Inc
PO Box 10047
Portland, OR 97296-0047

DEQ ID Number: ORD099155574
Schnitzer Steel Products Co

Enclosed is your company's Registration Verification Report (RVR) form. This form is for verifying hazardous waste generator registration information for calendar year 2000 as required by Oregon Administrative Rule (OAR) 340-102-0012, OAR 340-102-0041 and OAR 340-104-0075. This report was generated using information last reported by your facility. Your facility last notified DEQ that your generator status was Conditionally Exempt Generator (CEG).

It is important that you report your generator status correctly, complete the RVR accurately and submit the information by **March 15, 2001**. The information that you provide is the basis for determining generator fees, for determining regulatory compliance requirements, and for establishing eligibility to participate in DEQ's Waste Reduction Assistance Program and CEG collection events.

What do I do with the Registration Verification Report (RVR)?

- Verify that all preprinted facility information on the front of the RVR is correct and complete. Provide any updated information in the spaces provided.
- Verify your generator status for calendar year 2000. Your generator status is determined by the largest amount of hazardous waste you generated or had on-site in **any one month** during the 2000 calendar year. Mark your generator status in Box 6 of the RVR. Do not leave blank.
- On the reverse side of the RVR answer all of the questions that are applicable in Boxes 7 and 8. These boxes provide necessary additional information if an update was provided in Box 1 or 2 (e.g., ownership change, closure of business, etc.) and will enable DEQ to process the RVR without having to request more information.
- The information in Box 9 is required for the cancellation of the DEQ/EPA Identification Number if your business has stopped generating and managing hazardous waste. Most facilities should simply mark the first box indicating they wish to keep their Identification Number active.
- The generator or his/her authorized representative must sign the RVR. Mail the completed report by March 15, 2001, to: **Oregon DEQ, Waste Prevention & Management Division, Attn: Hazardous Waste Forms Clerk, 811 SW Sixth Avenue, Portland, OR 97204-1390**

How do I report if I was a SQG or LQG for any month in 2000?

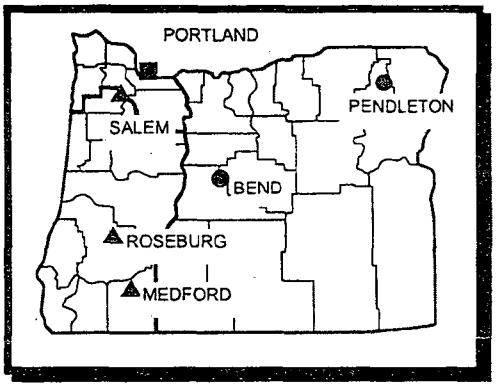
If in **any one calendar month** in 2000 your facility generated more than 220 pounds of hazardous waste or spill cleanup debris containing hazardous waste, or generated more than 2.2 pounds of acute hazardous waste, or accumulated more than 2,200 pounds of hazardous waste at any one time, your facility may be a Small Quantity Generator (SQG) or a Large Quantity Generator (LQG). If so, you must complete the 2000 Hazardous Waste Generation and Management reporting form in addition to the RVR. The Waste Generation and Management reporting

form can be downloaded or submitted to DEQ online at www.deq.state.or.us/wmc/hw/hwrptonlineforms.htm. You will find on this web page the 2000 Hazardous Waste Reporting Forms booklet containing the Waste Generation and Management annual report and the Waste Received annual report, plus all the reference material and instructions needed to complete these forms. You can also receive the Forms Booklet by mail by completing the enclosed postcard and returning it to DEQ.

If you need help...

- A DEQ map identifying regional offices is located below. If you have questions about hazardous waste regulations, including your generator status, please contact the Waste Reduction Assistance Program (WRAP) staff at your nearest regional office. Besides answering your questions by telephone, WRAP staff can provide on-site technical assistance visits upon request. These non-regulatory visits are aimed at identifying where you may save money through reduced disposal costs and less regulation, identifying areas that can be improved upon, and clarifying how the regulations affect your specific operations. WRAP staff can also provide you fact sheets and resource guides on numerous hazardous waste related subjects. Call one of the telephone numbers listed below or return the enclosed postcard if you would like more information.
- If you have questions regarding the report forms, please contact Sylvia Krummann at (503) 229-5470 or toll-free within the State of Oregon at 1-800-452-4011.
- Check out our web site at www.deq.state.or.us/wmc/hw/hwrptonlineforms.htm for information on hazardous waste management, technical resources, laws, regulations, fact sheets, plus a lot more.

DEQ REGIONAL OFFICES



■ Northwest Region
2020 SW 4th, Suite 400
Portland, OR 97201

Jay Collins
(503) 229-5165

Jim Maresh
(503) 229-6682

Beth Moore
(503) 229-5586

Laurey Cook
(503) 229-5058

▲ Western Region
750 Front St. NE, Suite 120
Salem, OR 97310

Bart Collinsworth
(503) 378-8240 x258

Eric Clark
(503) 378-8240 X253

-or-

725 SE Main St.
Roseburg, OR 97470

David Livengood
(541) 440-3338 x230

201 W Main Street, Suite 2-D
Medford, OR 97501

Wayne Kauzlarich
(541) 776-6010 X227

● Eastern Region
2146 NE 4th, Suite 104
Bend, OR 97701

John MacKellar
(541) 388-6146 x229

-or-

700 SE Emigrant, Suite 330
Pendleton, OR 97801

Barbara Minton
(541) 278-4622

1999 Waste Generation & Management — Answer Sheet

PLEASE ENTER:
Facility Name: Schnitzer Steel Products Co.
DEQ ID Number: ORD099155574

NOTE: **Make as many two-sided copies of the answer sheet as you need BEFORE answering any questions. REVIEW QUESTIONS ON PAGES 20-22 BEFORE COMPLETING ANSWER SHEET.**

1. Waste Stream Description ATRAZINE

2. Waste Code(s) _____

3. State-Only Code OR —

4. Mixed Waste? ☒ No ☐ Yes

5. Source Code: A _____ 6. Form Code: B 402

7. Waste Origin 1 ☐ 2 ☒ 3 ☐ 4 ☐

7A. Residual Management Code M —

8. Reported Toxic Substances in Waste? 1 ☒ 2 ☐ 3 ☐

8A. CAS Number (s) _____

9. Point of Measurement or Calculation 1 ☒ 2 ☐ 3 ☐ 4 ☐

10. Complete the Worksheet to the right and answer the following:

Total Quantity Generated for This Waste Stream 20 lbs

Unit of Measure P ☒ G ☐ ST ☐ C ☐ K ☐ L ☐ MT ☐

10A. Density _____ ☐ Pounds/gallon ☐ Specific gravity ☐ Pounds/cubic yard

Monthly Generation Worksheet (Question 10)
*Provide the actual monthly hazardous waste generation amounts for this waste stream (should not be a yearly average)

January	Ø	July	Ø
February	Ø	August	Ø
March	Ø	September	Ø
April	Ø	October	20 lbs
May	Ø	November	Ø
June	Ø	December	Ø

Total Quantity Generated for 1999: 20 lbs

11. Managed On or Off-site? ☐ On-site (answer 11A) ☒ Off-site (answer 13) ☐ Both On-site & Off-site (answer both 11A and 13)

11A. Quantity Managed or Recycled On-site — Management Code M _____

12. Quantity remaining on-site at the end of 1999 Ø
(Not otherwise managed on-or off-site, but accumulated or stored)

If any of this waste stream was shipped off-site in 1999, give details of each shipment on the back of this answer sheet.

(Comment Section Located on Reverse)

13. Provide the following information for each off-site shipment of waste.

(Include all shipments in 1999 for this waste stream even if it was generated in the previous year.)

Please Enter:
Facility Name: Schnitzer Steel Products Co.
DEQ ID Number: ORD099155574

1999 Manifest Shipment Date (enter month/day)	Manifest Document Number	Quantity Shipped of this Waste Stream (use unit of measure from Question #10)	DEQ/U.S. EPA ID # of First Transporter	How Managed (enter mgmt. code, other than M141)	Managed at Commercial Facility? (Y/N)	DEQ/U.S. EPA ID # of Receiving Facility (Designated Facility)
10-15-99	CESQG	10-15-99	—		Y	Burlington Env.

Comments: Material taken to Burlington Environmental / Phillips Environmental facility in Washougal, WA. Disposal/recycling event sponsored by the Dept. of Agriculture.

Liquid

BURLINGTON ENVIRONMENTAL

PHILIP ENVIRONMENTAL INC.

Seattle, Washington (206) 223-0500 or 1-800-228-7872
Washougal, Washington (206) 835-8743

SMALL QUANTITY GENERATOR WASTE ACCEPTANCE PROGRAM
CHECK-IN RECEIPT AND CERTIFICATION STATEMENT

TO BE COMPLETED BY SMALL QUANTITY GENERATOR:

Company Name: SCHNITZER STEEL PRODUCTS

Company Address: P.O. BOX 10047
PORTLAND, OR 97296

Company Phone No.: 503/286-6944

TO BE COMPLETED BY BURLINGTON ENVIRONMENTAL CHECK-IN ATTENDANT:

General Waste Description	New/Spent Material	Number of Containers	Container Type	Quantity (Wt/Vol)	Total Charge
ATRAZINE				26#	
TOTAL					

Method of Payment:

Cash _____ Check ✓ Check No. 3038 Total Amt. Paid 22.00

TO BE COMPLETED BY BURLINGTON ENVIRONMENTAL CHECK-IN ATTENDANT:

I certify that the preceding information is correct, and I have read and understand the requirements for participation in the Burlington Environmental, Inc. Small Quantity Generator Waste Acceptance Program. I further certify that I am a small quantity generator as defined by Washington State regulations, or conditionally exempt generator as defined by Oregon state regulations, and this quantity of waste does not exceed the specified limits for the type of waste being disposed. If this waste is later found to exceed small quantity limits or contain materials not approved by Burlington Environmental under this program, I agree to complete a hazardous waste manifest and comply with other state regulations as appropriate.

Company Representative:

Name (Printed): MATTHEW CUSMA

Signature: [signature]

Title: ENVIRONMENTAL ADMINISTRATOR

Date: 15 OCT 99

Burlington Environmental Check-In Attendant's Initials _____ Date 10-15-99

(Rev. 11/94)

Burlington Environmental Receipt Number _____

SCHN00246885

1999 Waste Generation & Management — Answer Sheet

PLEASE ENTER:
Facility Name: Schnitzer Steel Products Co.
DEQ ID Number: ORD099155574

NOTE: **Make as many two-sided copies of the answer sheet as you need BEFORE answering any questions. REVIEW QUESTIONS ON PAGES 20-22 BEFORE COMPLETING ANSWER SHEET.**

1. Waste Stream Description: Resin Solution 3 (Styrene Resin)

2. Waste Code(s): D001

3. State-Only Code OR: —

4. Mixed Waste? ☒No ☐Yes

5. Source Code: A 58

6. Form Code: B 403 (Styrene Resin)

7. Waste Origin 1 ☐ 2 ☒ 3 ☐ 4 ☐

7A. Residual Management Code M: —

8. Reported Toxic Substances in Waste? 1 ☒ 2 ☐ 3 ☐

8A. CAS Number (s): —

9. Point of Measurement or Calculation 1 ☒ 2 ☐ 3 ☐ 4 ☐

10. Complete the Worksheet to the right and answer the following:

Total Quantity Generated for This Waste Stream: 2

Unit of Measure P ☐ G ☒ ST ☐ C ☐ K ☐ L ☐ MT ☐

10A. Density: ☒Pounds/gallon ☐Specific gravity ☐Pounds/cubic yard

11. Managed On or Off-site? ☐On-site (answer 11A) ☒Off-site (answer 13) ☐Both On-site & Off-site (answer both 11A and 13)

11A. Quantity Managed or Recycled On-site: — Management Code M: —

12. Quantity remaining on-site at the end of 1999: Ø
(Not otherwise managed on-or off-site, but accumulated or stored)

Monthly Generation Worksheet (Question 10)
*Provide the actual monthly hazardous waste generation amounts for this waste stream (should not be a yearly average)

January	Ø	July	Ø
February	Ø	August	Ø
March	Ø	September	Ø
April	Ø	October	20 gallons or 149.6 lbs
May	Ø	November	Ø
June	Ø	December	Ø

Total Quantity Generated for 1999: 149.6 lbs or 20 gallons

If any of this waste stream was shipped off-site in 1999, give details of each shipment on the back of this answer sheet.

(Comment Section Located on Reverse)

SCHN00246886

13. Provide the following information for each off-site shipment of waste.

(Include all shipments in 1999 for this waste stream even if it was generated in the previous year.)

Please Enter:
Facility Name: Schnitzer Steel Products Co.
DEQ ID Number: ORD099155574

1999 Manifest Shipment Date (enter month/day)	Manifest Document Number	Quantity Shipped of this Waste Stream (use unit of measure from Question #10)	DEQ/U.S. EPA ID # of First Transporter	How Managed (enter mgmt. code, other than M141)	Managed at Commercial Facility? (Y/N)	DEQ/U.S. EPA ID # of Receiving Facility (Designated Facility)
10/19/99	663	20 gallons	WAH980978142		Y	WAD000812909

Comments:

Emergency Contact Telephone Number

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: C.E.S.Q.G.
Manifest Document No.: 663
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: SCHNITZER STEEL PRODUCTS INC
12005 N. BURGARD RD. PORTLAND, OR 97203
4. Generator's Phone: (503) 286 4693

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: ENVIROSAFE N.W.
6. US EPA ID Number: WAH98097814.2
C. State Transporter's ID
D. Transporter's Phone: 1-800 367 8894

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address: SOL-PRO
1825 ALEXANDER AV
10. US EPA ID Number: TACOMA, WA 98421
WAD 8 0 8 1 2 9 0 9
G. State Facility's ID
H. Facility's Phone: 253 627 4822

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RESIN SOLUTION 3, UN1866 11 D001	001	DM	00020	G	WT02 D001
b.							
c.							
d.							

ORIGINAL RETURNED TO GENERATOR
OCT 20 1999

J. Additional Descriptions for Materials Listed Above: WPQ # 06936
10142

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: X MATHEW J. COSMA
Signature: [signature]
Month 10 Day 19 Year 99

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: JOHN BRIGGS
Signature: [signature]
Month 10 Day 19 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Chris Erdew
Signature: [signature]
Month 10 Day 19 Year 99

GENERATOR
TRANSPORTER
FACILITY

ORIGINAL — RETURN TO GENERATOR

SCHN00246888

UNIFORM HAZARDOUS WASTE MANIFEST AND INSTRUCTIONS EPA FORM 8700-22

U.S. EPA Form 8700-22

Read all instructions before completing this form.

This form has been designed for use on a 12-pitch (elite) typewriter; a firm point pen may also be used – press down hard.

Federal regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation.

Federal regulations also require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage and disposal facilities to complete the following information:

GENERATORS

Item 1. Generator's U.S. EPA ID Number – Manifest Document Number

Enter the generator's U.S. EPA twelve digit identification number and the unique five digit number assigned to this Manifest (e.g., 00001) by the generator.

Item 2. Page 1 of –

Enter the total number of pages used to complete this Manifest, i.e., the first page (EPA Form 8700-22) plus the number of Continuation Sheets (EPA Form 8700-22A), if any.

Item 3. Generator's Name and Mailing Address

Enter the name and mailing address of the generator. The address should be the location that will manage the returned Manifest forms.

Item 4. Generator's Phone Number

Enter a telephone number where an authorized agent of the generator may be reached in the event of an emergency.

Item 5. Transporter 1 Company Name

Enter the company name of the first transporter who will transport the waste.

Item 6. U.S. EPA ID Number

Enter the U.S. EPA twelve digit identification number of the first transporter identified in item 5.

Item 7. Transporter 2 Company Name

If applicable, enter the company name of the second transporter who will transport the waste. If more than two transporters are used to transport the waste, use a Continuation Sheet(s) (EPA Form 8700-22A) and list the transporters in the order they will be transporting the waste.

Item 8. U.S. EPA ID Number

If applicable, enter the U.S. EPA twelve digit identification number of the second transporter identified in item 7.

Note.–If more than two transporters are used, enter each additional transporter's company name and U.S. EPA twelve digit identification number in items 24-27 on the Continuation Sheet (EPA Form 8700-22A). Each Continuation Sheet has space to record two additional transporters. Every transporter used between the generator and the designated facility must be listed.

Item 9. Designated Facility Name and Site Address

Enter the company name and site address of the facility designated to receive the waste listed on this Manifest. The address must be the site address, which may differ from the company mailing address.

Item 10. U.S. EPA ID Number

Enter the U.S. EPA twelve digit identification number of the designated facility identified in item 9.

Item 11. U.S. DOT Description [Including Proper Shipping Name, Hazard Class, and ID Number (UN/NA)]

Enter the U.S. DOT Proper Shipping Name, Hazard Class, and ID Number (UN/NA) for each waste as identified in 49 CFR 171 through 177.

Note.–If additional space is needed for waste descriptions, enter these additional descriptions in item 28 on the Continuation Sheet (EPA Form 8700-22A).

Item 12. Containers (No. and Type)

Enter the number of containers for each waste and the appropriate abbreviation from Table I (below) for the type of container.

Table I – Types of Containers

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
TP = Tanks portable	CF = Fiber or plastic boxes, cartons, cases
TT = Cargo tanks (tank trucks)	BA = Burlap, cloth, paper or plastic bags
TC = Tank cars	
DT = Dump truck	

Item 13. Total Quantity

Enter the total quantity of waste described on each line.

Item 14. Unit (Wt./Vol.)

Enter the appropriate abbreviation from Table II (below) for the unit of measure.

Table II – Units of Measure

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. Special Handling Instructions and Additional Information

Generators may use this space to indicate special transportation, treatment, storage, or disposal information or Bill of Lading information. States may not require additional, new, or different information in this space. For international shipments, generators must enter in this space the point of departure (City and State) for those shipments destined for treatment, storage, or disposal outside the jurisdiction of the United States.

Item 16. Generator's Certification

The generator must read, sign (by hand), and date the certification statement. If a mode *other than* highway is used, the word "highway" should be lined out and the *appropriate mode (rail, water, or air) inserted in the space below.* If another mode *in addition to* the highway mode is used, enter the appropriate additional mode (e.g., *and rail)* in the space below.

Primary exporters shipping hazardous wastes to a facility located outside of the United States *must add to the end of the first sentence of the certification the following words* "and conforms to the terms of the EPA Acknowledgment of Consent to the shipment."

In signing the waste minimization certification statement, those generators who have not been exempted by statute or regulation from the duty to make a waste minimization *certification under section 3002(b) of RCRA are also certifying that they have complied* with the waste minimization requirements.

Generators may preprint the words. "On behalf of" in the signature block or may hand write this statement on the signature block prior to signing the generator certifications.

Note.–All of the above information *except* the handwritten signature required in item 16 may be preprinted.

TRANSPORTERS

Item 17. Transporter 1 Acknowledgement of Receipt of Materials

Enter the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Item 18. Transporter 2 Acknowledgement of Receipt of Materials

Enter, if applicable, the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Note.–International Shipments – Transporter Responsibilities.

Exports–Transporters must sign and enter the date the waste left the United States in item 15 of Form 8700-22.

Imports–Shipments of hazardous waste regulated by RCRA and transported into the United States from another country must upon entry be accompanied by the U.S. EPA Uniform Hazardous Waste Manifest. Transporters who transport hazardous waste into the United States from another country are responsible for completing the Manifest (40 CFR 263.10(c)(1)).

OWNERS AND OPERATORS OF TREATMENT, STORAGE, OR DISPOSAL FACILITIES

Item 19. Discrepancy Indication Space

The authorized representative of the designated (or alternate) facility's owner or operator must note in this space any significant discrepancy between the waste described on the Manifest and the waste actually received at the facility.

Owners and operators of facilities located in unauthorized States (i.e., the U.S. EPA *administers the hazardous waste management program) who cannot resolve* significant discrepancies within 15 days of receiving the waste must submit to their Regional Administrator (see list below) a letter with a copy of the Manifest at issue describing the discrepancy and attempts to reconcile it (40 CFR 264.72 and 265.72).

Owners and operators of facilities located in authorized States (i.e., those States that have received authorization from the U.S. EPA to administer the hazardous waste program) should contact their State agency for information on State Discrepancy Report requirements.

EPA Regional Administrators

Regional Administrator, U.S. EPA Region I, J.F. Kennedy Fed. Bldg., Boston, MA 02203

Regional Administrator, U.S. EPA Region II, 26 Federal Plaza, New York, NY 10278

Regional Administrator, U.S. EPA Region III, 6th and Walnut Sts., Philadelphia, PA 19106

Regional Administrator, U.S. EPA Region IV, 345 Courtland St., NE., Atlanta, GA 30365

Regional Administrator, U.S. EPA Region V, 230 S. Dearborn St., Chicago, IL 60604

Regional Administrator, U.S. EPA Region VI, 1201 Elm Street, Dallas, TX 75270

Regional Administrator, U.S. EPA Region VII, 324 East 11th Street, Kansas City, MO 64106

Regional Administrator, U.S. EPA Region VIII, 1860 Lincoln Street, Denver, CO 80295

Regional Administrator, U.S. EPA Region IX, 215 Freemont Street, San Francisco, CA 94105

Regional Administrator, U.S. EPA Region X, 1200 Sixth Avenue, Seattle, WA 98101

Item 20. Facility Owner or Operator: Certification of Receipt of Hazardous Materials Covered by This Manifest Except as Noted in Item 19

Print or type the name of the person accepting the waste on behalf of the owner or operator of the facility. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Items A-K are not required by Federal regulations for intra- or interstate transportation. *However, States may require generators and owners or operators of treatment,* storage, or disposal facilities to complete some or all of items A-K as part of State manifest reporting requirements. Generators and owners and operators of treatment, storage, or disposal facilities are advised to contact State officials for guidance on completing the shaded areas of the Manifest.

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office Management and Budget, Washington, DC 20503.

Envirosafe Northwest Inc.

An Oil Re Refining Subsidiary
PO Box 1407 Woodland, WA. 98674
Ph. 1.800.367.8894 Fax (503) 286.5027

28 SEP 99

Schnitzer Steel Products Inc.
Mat Cusma
12005 N Burgard Rd.
Portland, OR 97203

Mat,

Here is the Profile/waste analysis form for disposal of the resin product I sampled. I will be able to remove that product the first of next week, if that is convenient for you.

Estimate/Authorization form

Administration and profiling	$110.00 (billed)
Transportation	$15.00 per drum
Treatment and disposal	$347.50 per drum
TOTAL for one 55 gallon drum	**$362.50**

Please sign this document and the Waste Profile sheet and fax back to me at 286-5027

Acceptance X _____ Date 29 SEP 99

If you have any questions please call me.

Regards,

John Briggs

3401 LINCOLN AVE
TACOMA, WA 98421

GENERATOR'S WASTE MATERIAL PROFILE SHEET

A. GENERATOR INFORMATION

SP PROFILE #: 10830

1. Generator Name: SCHNITZER STEEL
2. Generator,USEPA ID#: ORD 009 155 574
3. Facility Address: 12005 N. Burgard
SP Contact: 6 Dean Pase
City: Portland State: OR Zip Code: 97214 SP Customer #: 10142
4. Generator Contac: Matt Cusma 5. Title: P.O.C. 6. Phone: 503-286-4693
7. Consultant (if any): Enviroqsafe NW 8. Name: John Briggs 9. Phone: 800-367-8894

B. WASTE INFORMATION

1. Name Of Waste: Styrene Resin
2. Form Code: B606 resins, tars, or tarry sludge
3. Process Generating Waste (be specifi: Repair Work
4. Sample: SS-01
5. Generator has provided the followi: ☑ Sample ☐ MSDS ☐ Waste Analysi ☐ Lab Analysis Attatche ☑ Generator Knowledge

C. PHYSICAL CHARACTERISTIC OF WASTE

1. Color: Bluegreen
2. Physical State @ 70 deg: ☐ Solid ☐ Powder ☐ Liquid ☑ Semi-Soli
3. Layers: ☑ Single Laye ☐ Bi-Layere ☐ Multi-Layere
4. Specific Gravit: ☐ <0.8 ☐ 1.1-1.2 ☑ 0.8-1.0 ☐ 1.3-1.4 Sp. Gr.
5. Free Liquid: ☐ No ☑ Yes % Sludge %
6. pH: ☐ NA ☐ 4-6 ☐ 10-12 ☐ <2 ☑ 6-8 ☐ >12 ☐ 2-4 ☐ 8-10 Actual:

7. Liquid Flash Poi: ☑ <73 Deg. ☐ 73-100 deg. ☐ 101-<140 Deg. ☐ 140-200 Deg. ☐ >200 Deg. ☐ None ☑ Closed Cu ☐ Open Cup Actual Flash poin
8. BTU/lbs. (fuel blending): >5000
9. VOC Emission Level (574 mm Hg at 25 Deg.): ☐ Exceeds ☐ Below ☑ NA

E. TOTAL COMPOSITION OF WASTE: (all hazardous/non-hazardou

1. Include debris/water as constitue

	Minimum	Maximu
Styrene Resin	0	100 %
	0	0 %
	0	0 %
	0	0 %
	0	0 %
	0	0 %
	0	0 %
	0	0 %
	0	0 %
	0	0 %
	0	0 %
	0	0 %
TOTAL:	100	%

Please Note: The Total composition must be greater or

2. Indicate if this waste contains any of the following:

	Concentratio	Not Presen
PCB	0 ppm	☑
Cyanides	0 ppm	☑
Phenolics	0 ppm	☑
Sulfides	0 ppm	☑

F. METALS: Indicate if the waste contains any of the following metals, check all box(es) that apply. (Note: If the metal is present and below the regulated concentration check that box).

☐ TCLP ☑ Generator Knowledge
☐ TOTAL ☐ N/A

METAL	BELOW	CODE	ANALYSIS
Arsenic (As)	☑ <5 pp	D004	ppm
Barium (Ba)	☑ <100 pp	D005	ppm
Cadmium (C	☑ <1 pp	D006	ppm
Chromium (C	☑ <5 ppm	D007	ppm
Lead (Pb)	☑ <5 ppm	D008	ppm
Mercury (Hg)	☑ <0.2 pp	D009	ppm
Selenium (Se	☑ <1 ppm	D010	ppm
Silver (Ag)	☑ <5 ppm	D011	ppm

G. IS THIS WASTE ANY OF THE FOLLOWING?

☐ Pesticides/Herbicide
☐ Dioxins
☐ Oxidizers
☐ Water Reactive
☐ Shock Sensitive
☐ Reactive
☐ Radioactive
☑ None Apply

H. USEPA / WA STATE WASTE IDENTIFICATION:

1. Hazardous/Dangerous Wast ☑ YES ☐ NO 2. Subject to Land Disposal Restrictio ☑ YES ☐ NO
☐ Non-regulate ☐ Exemp ☐ CESQG ☐ Lab pack 3. WA DOE Designation: ☑ DW ☐ EHW
4. List ALL Applicable Waste Codes:
EPA Codes: D001
DOE Codes: WT02

I. SHIPPING INFORMATION:

1. Is this a DOT Hazardous Materi ☑ YES ☐ NO
2. Reportable Quantity (RQ) in Poun: 100 LBS
3. Method of Shipmen ☐ Bulk Liqui ☐ Bulk Solids ☑ Container (Type/Siz: 1A2 Opentop - 55 gl metal
☐ One Time or Anticipated Volume/Units per Year:
4. Proper Shipping Nam
Status: WASTE RESIN SOLUTION, 3, UN1866, II
DOT Emerency Response Guide # (ERG): 127
Additional Informatio: (D001)

J. GENERATOR CERTIFICATION: I hereby certify that all information submitted in the and all attached documents of this Waste Material Profile, and all relevant information regarding known or suspected hazards in the possession of the generator has been disclosed.

X SIGNATURE — MATHEW CUSMA (NAME (Type or Print)) — ENVIRONMENTAL ADM. (TITLE) — 29 SEP 99 (DATE)

SECTION 1: Generator Information

ID 663

Generator: SCHNITZER STEEL WPQ #: 10830 EPA ID #: ORD 009 155 574 Manifest #:

Treatment technology codes are required for this waste stream as follows: CMBST

Treatment Codes: (CMDST; or RORGS) or (RORGS; or CMBST)

SECTION 2: Material NOT Subject to Land Disposal Restrictions

☐ The material is NOT regulated by the EPA Land Disposal Restrictions. No further information is required.

SECTION 3: Material Subject to Land Disposal Restrictions (LDR)

Note: The wastes identified on this form are subject to the land disposal restrictions of 40 CFR Part 268. The wastes do not meet the treatment standards specified in Part 268, Subpart D or do not meet the applicable prohibition levels specified in 268.32 or RCRA Section 3004(d). Pursuant to 40 CFR 268.7(a), the required information applicable to each waste is identified below (check all boxes that apply):

☑ This shipment includes D001 High TOC Ignitables (the UTS list is not required to be completed)

☐ This shipment includes D001 Low TOC Ignitables (the UTS list in Section 6 is required to be completed)

☐ This shipment includes D004 - D043 codes and is not a D001 High TOC (the UTS list in section 6 page 2 of the LDR must be completed)
(Note: Sol-Pro does not accept D012 - D017 pesticide waste streams)

☐ This shipment contains F001 - F005 spent solvents : Complete Section 5 : Treatment Standards for F001 - F005 spent solven

SECTION 4: Phase IV Metal Characteristic Waste

Treatment standards for D004-D011 metals were changed from characteristic levels to the new, predominatly lower UTS levels by EPA. The effective date for this change is August 24, 1998. Generators are required to declare Underlying Hazardous Constituents on the D004-D011 materials. Federal Register May 26, 1998, Volume 63, Number 100, Page 28555-28604.

☐ This shipment contains D004-D011 Metal Characteristic material not meeting the final LDR Phase IV Underlying Treatment Standard.

☐ D004 - Arsenic ☐ D006 - Cadmium ☐ D008 - Lead ☐ D010 -Selenium
☐ D005 - Barium ☐ D007 - Chromium ☐ D009 - Mercury ☐ D011 - Silver

SECTION 5: Treatment Standards for F001 - F005 Spent Solvents

Check the box for each waste included in the off-site shipment: Check or otherwise identify the individual constituents likely to be present in the waste stream. Check the corrisponding waste code.

Hazardous Waste description	Constituent of Concern
☐ F001 SPENT HALOGENATED SOLVENTS USED IN DEGREASING	☐ Carbon tetrachloride ☐ Methylene Chloride ☐ Tetrachloroethylene ☐ 1,1,1-Trichloroethane ☐ Trichloroethylene ☐ 1,1,2-Trichloro-1,2,2-trifluorethane ☐ Trichloromonofluoroethane
☐ F002 SPENT HALOGENATED SOLVENTS	☐ Chlorobenzene ☐ o-Dichlorobenzene ☐ Methylene Chloride ☐ Tetrachloroethylene ☐ 1,1,1- Trichloroethane ☐ 1,1,2-Trichloroethane ☐ Trichloroethylene ☐ 1,1,2-Trichloro-1,2,2-trifluoroethane ☐ Trichloromonofluoromathane
☐ F003 SPENT NON-HALOGENATED SOLVENTS	☐ Acetone ☐ n-Butyl alcohol ☐ Cyclohexanone ☐ Ethyl acetate ☐ Ethyl benzene ☐ Ethyl ether ☐ Methanol ☐ Methyl isobutyl ketone ☐ Xylene (total)
☐ F004 SPENT NON-HALOGENATED SOLVENTS	☐ Cresol o-, p-, m- or mixed isomers (Cresylic acid) ☐ Nitrobenzene
☐ F005 SPENT NON-HALOGENATED SOLVENTS	☐ Benzene ☐ Carbon disulfide ☐ 2-Ethoxyethanol ☐ Isobutyl alcohol ☐ Methyl ethyl ketone ☐ 2-Nitropropane ☐ Pyridine ☐ Toluene

I certify that I personally have examined and am familiar with the waste through analysis and testing, or through knowledge of the waste to support this certification. I certify that as an authorized representative of the generator named above, all the information submitted in this notification is true and correct to the best of my knowledge.

MATHEW CUSMA — Printed Name
Signature
29 SEP 99 — Date

Oregon
John A. Kitzhaber, M.D., Governor

Department of Environmental Quality
Headquarters
811 SW Sixth Avenue
Portland, OR 97204-1390
(503) 229-5696
FAX (503) 229-6124
TTY (503) 229-6993

January 6, 2000

Hazardous Waste Coordinator
Schnitzer Steel Products Co
PO Box 10047
Portland, OR 97210

DEQ ID Number: ORD099155574
Schnitzer Steel Products Co

Enclosed is your 1999 Registration Verification Report. This report was generated using information most recently reported by your facility. Your facility last notified DEQ that your status was Conditionally Exempt Generator (CEG).

What do I do with the Registration Verification Report (RVR)?

- Verify your generator status for calendar year 1999. Your generator status is determined by the largest amount of hazardous waste you generated or had on-site in any month during the 1999 calendar year. **Mark your generator status in Box 6 of the RVR.**

- Verify that all preprinted facility information on the front of the RVR is correct and complete. Provide any updated information in the space provided to the right of each box. You only need to fill in the blank boxes to the right if the information has changed from what is preprinted in Boxes 1 through 5.

- Answer all of the questions, **sign the certification on the reverse side** of the RVR, and return it to DEQ by **March 15, 2000.** Send the completed report to:

  Oregon DEQ
  Waste Management & Cleanup Division
  Attn: Hazardous Waste Forms Clerk
  811 SW Sixth Ave.
  Portland, OR 97204-1390

How do I report if I was a LQG or SQG for any month in 1999?

Your facility may be a Large Quantity Generator (LQG) or Small Quantity Generator (SQG), if in **any one calendar month** in 1999 your facility: generated more than 220 pounds of hazardous waste; or generated more than 220 pounds of spill cleanup debris containing hazardous waste; or generated more than 2.2 pounds of acute hazardous waste; or accumulated more than 2,200 pounds of hazardous waste at any one time. If so, you must complete the 1999 Hazardous Waste Generation and Management Form in addition to the RVR. Starting February 1, 2000, you may download the 1999 Hazardous Waste Reporting Forms from DEQ's Web Page at **http://www.deq.state.or.us/** and selecting Hazardous Waste under the "Information by Environmental Subject". The forms can also be ordered by mail by completing the enclosed postcard and returning it to DEQ.

Why is accurate reporting important?

It is important that you report your generator status correctly, complete the answer sheet accurately and submit the information by **March 15, 2000.** DEQ uses this information for determining generator fees, for determining regulatory compliance requirements, and for establishing eligibility for participation in DEQ's Waste Reduction Assistance Program and CEG collection events.

* 1767 *

DEQ-DC1

SCHN00246895

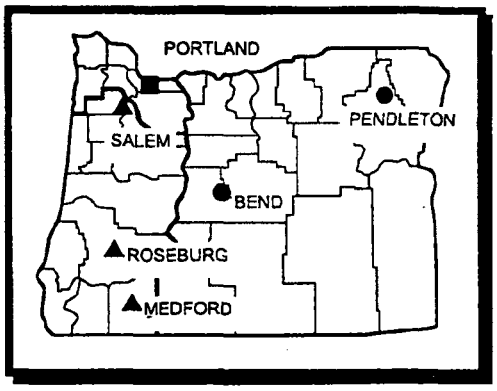
If you need help...

- A DEQ map identifying regional offices is located below. If you have questions about hazardous waste regulations, including your generator status, please contact the Waste Reduction Assistance Program Staff (WRAP) at your nearest regional office. Besides answering your questions by telephone, WRAP staff can provide on-site technical assistance visits upon request. These non-regulatory visits are aimed at identifying where you may save money through reduced disposal costs and less regulation, identifying areas that can be improved upon, and clarifying how the regulations affect your specific operations. WRAP staff can also mail you fact sheets and resource guides on numerous hazardous waste related subjects. Call one of the telephone numbers listed below or return the enclosed postcard if you would like more information.

- If you have questions regarding the report forms, please contact Sylvia Krummann at (503) 229-5470 or toll-free within the State of Oregon at 1-800-452-4011.

- Check out our web site at http://www.deq.state.or.us/ for information on hazardous waste management, technical resources, laws, regulations, fact sheets, plus a lot more. Starting February 1, 2000 the hazardous waste reporting forms can be downloaded or completed and submitted to DEQ online.

DEQ REGIONAL OFFICES



■ **Northwest Region**
2020 SW 4th, Suite 400
Portland, OR 97201

Kevin Masterson
(503) 229-5615

Jay Collins
(503) 229-5165

Beth Moore
(503) 229-5586

▲ **Western Region**
750 Front St. NE, Suite 120
Salem, OR 97310

Bart Collinsworth
(503) 378-8240 x258

Eric Clark
(503) 378-8240 X253

-or-

725 SE Main St.
Roseburg, OR 97470

David Livengood
(541) 440-3338 x230

201 W Main Street, Suite 2-D
Medford, OR 97501

Wayne Kauzlarich
(541) 776-6010 X227

● **Eastern Region**
2146 NE 4th, Suite 104
Bend, OR 97701

John MacKellar
(541) 388-6146 x229

-or-

700 SE Emigrant, Suite 330
Pendleton, OR 97801

Barbara Minton
(541) 276-4063

Susan H. Eidman
Technical Assistant
Hazardous Waste Policy and
Program Development
eidman.susan@deq.state.or.us

Oregon
DEPARTMENT OF
ENVIRONMENTAL
QUALITY
Waste Management & Cleanup
811 SW Sixth Avenue
Portland, Oregon 97204
(503) 229-6511
Fax: (503) 229-6977
TTY: (503) 229-6993

Understanding EPA RCRA Hazardous Waste ID Numbers

EPA hazardous waste sites can have up to 3 ID numbers associated with them:

- The CERCLA (Superfund) ID number - this number is used by EPA to track contractor dollars, it is not the ID number used to generate, move, treat/store/dispose of hazardous wastes, polychlorinated biphenyls (PCBs) or Asbestos;

- The RCRA (Hazardous Waste) ID number - this number is the one you must have to generate, transport, treat/store/dispose of hazardous wastes. The marketing of used oil and burning of hazardous waste fuel also come under this ID number; it is NOT to be used for activities related to PCBs or Asbestos;

- A TRI (PCB) ID number - this number is required for generating, transporting and treating/storing/disposing of PCBs. Asbestos removal activity questions should be directed to EPA Region 10 (206) 553-1200.

Many times, there is only one ID number issued, but it has "certifications" for other programs, e.g. a facility can have one ID number and have "certifications" for RCRA, CERCLA, PCB and NPDES activities also. However, this is not always the case. Recently, sites requesting a RCRA number, who already have a CERCLA number, are issued a new (RCRA) ID number in addition to their CERCLA number. This occurs when the requester does not realize they already have a RCRA ID number issued (they may not realize that their larger organization already has a number); the site name and address on the new request does not match any site in the database, but it is the same property (contiguous with the same owner); data entry staff neglect to check existing records prior to data entry; or it could be related to how EPA has changed its databases and ID number issuance in the past year; or various other timing problems.

It is advisable to plan ahead when you need an EPA ID number issued for your activities. CERCLA ID numbers are internal EPA numbers, so users don't need to plan for these. RCRA ID numbers can take from 3-10 working days to issue. The staff who issue RCRA ID numbers are:

Alaska ID numbers - Susanne Salcido at (206) 553-8511
Idaho ID numbers - Dean Ehlert (208) 373-0416
Oregon ID numbers - Susan Eidman (503) 229-6511
Washington ID numbers - Sheri Dotson (360) 407-7555

Alaska and Idaho use the Standard Form (SF) 8700-12. Blank SF 8700-12s can be sent to requesters via U.S. mail or by fax. Completed forms can be faxed to the appropriate Office to speed up the process of ID number issuance, but the ID number will not be released until the original form arrives at the issuing Office. Oregon and Washington use their own specialized forms. Overnight or express mail can usually speed up the process of obtaining your ID number.

PCB ID numbers are issued by EPA Headquarters (HQ) in Washington, D.C. and take from 10-45 days. Emergency removals have special rules and require contacting the Region 10 (Seattle) contact Dan Duncan at (206) 553-6693. HQ contacts Laura Casey at (202) 260-1346 or Toni White (202) 260-3933 actually issue the PCB ID numbers; fax completed forms to (202) 260-1724. If you already have a RCRA ID number, be sure to indicate that on the PCB form.

Keeping a copy of each form sent to EPA or the State is critical, as well as understanding the use of EPA ID numbers. The new EPA Envirofacts database on the Internet's World Wide Web can help users determine if they already have an EPA ID number. The Internet address is:

http://www.epa.gov/enviro/index_java.html

Prepared by: S. Salcido 11/98

HAZARDOUS WASTE PROGRAM

The DEQ is authorized by the federal Environmental Protection Agency (EPA) to regulate hazardous waste in Oregon. Proper hazardous waste management is an integral part of protecting Oregon's land, air, and water systems.The DEQ strives to enforce existing environmental regulations; identify management strategies that emphasize sound science and engineering; and work in partnerships with private industry and governmental groups to provide assistance and regulatory flexibility, while at the same time reducing pollution.

Compliance & Permitting. Compliance inspections & facility permitting.

Technical Assistance. Hazardous Waste Management A to Z for small businesses.

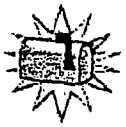
Pollution Prevention & Recycling. Technical resources & money-saving ideas.

Resource Library. Laws, regulations, & factsheets.

Program and Policy Development

Staff Directory. Staff phone numbers, e-mail & addresses.

Environmental Links. Links to internet information resources by subject.



E-mail your hazardous waste questions to DEQ staff at hw@deq.state.or.us

This website is intended to be a resource for businesses that generate hazardous waste, governmental agencies, environmental consultants, contractors, students, teachers, and concerned citizens. We welcome your FEEDBACK and recommendations for improvement.

SCHN00246899

SCHNITZER STEEL INDUSTRIES, INC.
PO BOX 10047
PORTLAND, OREGON 97296-0047

August 15, 2000

U.S. Department of Transportation
Hazardous Materials Registration
P.O. Box 740188
Atlanta, Georgia 30374-0188

To whom it may concern:

We have received your U.S. Department of Transportation Hazardous Materials Registration forms in the mail on several occasions. We believe Schnitzer Steel Industries, Inc. **is not** a Transporter of Hazardous Materials as defined by 40CFR 107.601-107.620 and as illustrated in your registration program packet of information (attached). We would very much appreciate being removed from your list of Hazardous Material Transporters. If you have any information that would indicate otherwise, please contact me on or before September 15, 2000 so we can properly address registration requirements. If you have comments you can reach me at (503) 286-6976. Written responses should be sent to the address listed above.

Sincerely,

Jim Jakubiak

Jim Jakubiak
Environmental Administrator

Attachment

Cc: US Department of Transportation, Research and Special Programs Administration

U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

JUL 31 2000

TO CARRIERS, SHIPPERS, AND OTHER OFFERORS OF HAZARDOUS MATERIALS

In May and June we mailed to your company brochures describing the U.S. Department of Transportation's (DOT) Hazardous Materials Registration Program. We sent those mailings to your company because it was identified as a carrier or shipper of hazardous materials on the Office of Motor Carrier Census form (Form MCS-150) when that form was filed or is included in our internal records of companies that offer or transport hazardous materials. We are again sending you this information to make sure that you understand that companies that engage in activities requiring registration with the DOT must file a registration statement and pay a fee.

Beginning with the 2000-2001 registration year, which began on July 1, 2000, each company that (1) offers a shipment of hazardous materials (including hazardous wastes) for transportation that by itself requires the **placarding** of the transport vehicle or (2) carries a hazardous material in a quantity that requires **placarding** of the transport vehicle must register. The exceptions to this requirement are discussed in the enclosed brochure on page 2 under the heading "Person."

This change to the regulations means that companies that previously were not required to register may now be subject to the registration requirement. If at any time between July 1, 2000, and June 30, 2001, your company either carries, ships, or otherwise offers for transportation a shipment that requires the placarding of the transport vehicle, rail car, unit load device, freight container, or bulk packaging, your company must register. See 49 CFR 172.500-560 for the Department's placarding requirements.

If your company is required to register, you may mail the form supplied in the enclosed brochure, with a check or credit card information, to the address printed on the back of the form. Or you may now register on the Internet at

http://hazmat.dot.gov/register.htm

If you are not engaging in any activity that requires registration, or if you have already registered for the 2000-2001 registration year, no further action is necessary. If you have questions about the registration program, please call us at 202-366-4109. If you have questions about the hazardous materials regulations (including the placarding requirements), please call the Hazardous Materials Information Center at 1-800-467-4922.

U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street S.W.
Washington, D.C. 20590

HAZARDOUS MATERIALS REGISTRATION PROGRAM

This packet contains information outlining registration requirements applicable to persons who offer or transport hazardous materials in commerce. If you received this in the mail, we have sent it to you because your company is currently registered in the Hazardous Materials Registration Program or appears on one or more of several lists of companies as an offeror or transporter of hazardous materials (including hazardous wastes). These lists were collected primarily from offices within the U.S. Department of Transportation or the U.S. Environmental Protection Agency.

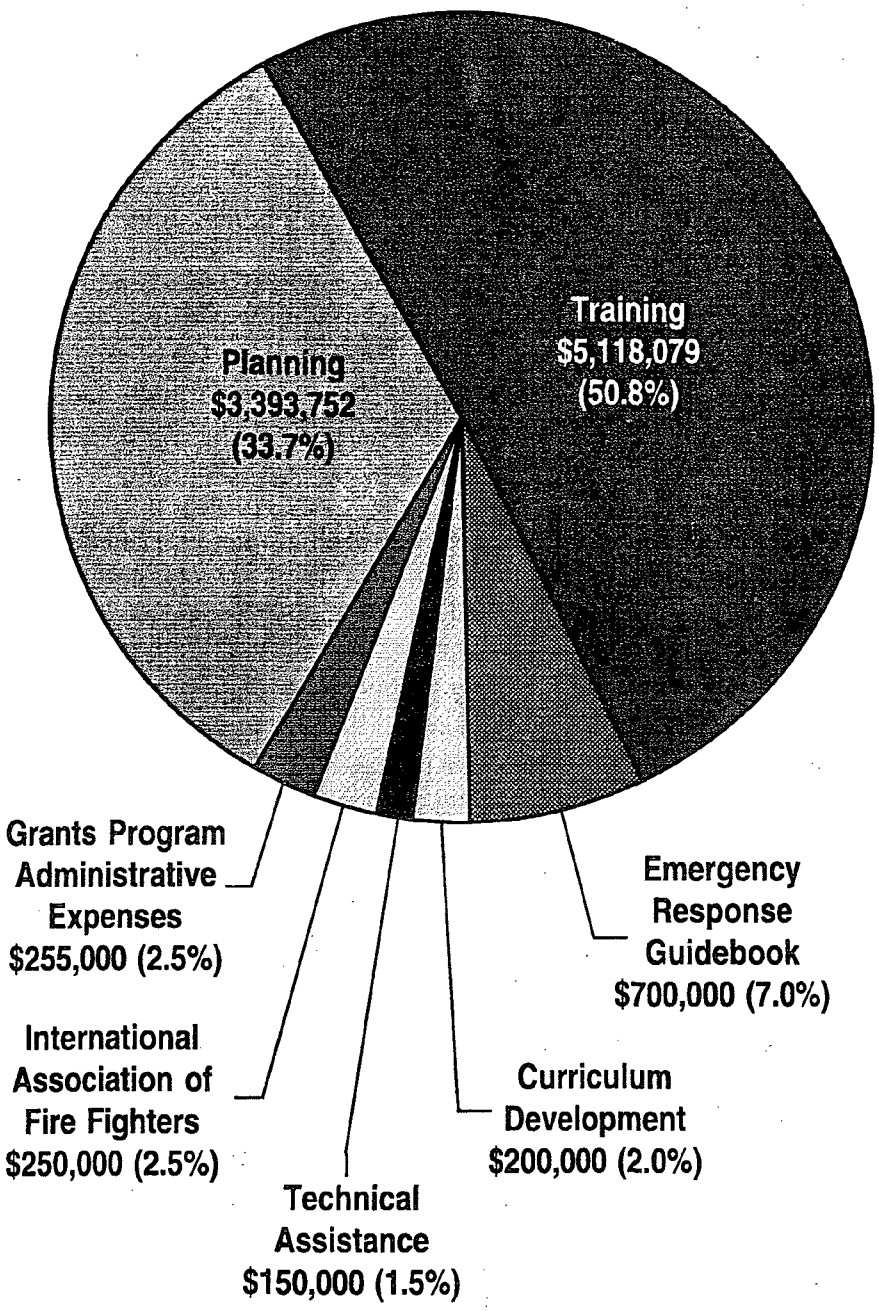
The accompanying material includes information on who is required to register with the U.S. Department of Transportation's Hazardous Materials Registration Program. **The registration requirements have been significantly revised for the registration year that begins on July 1, 2000, and persons who formerly were not required to register may now be required to do so.** All activities that formerly required registration continue in effect. While inclusion in any of our source lists is not an absolute indication that you are required to register, it does indicate that you may be subject to the registration requirements. You should read the explanation of who is required to register on page 2 of the instructions brochure to determine whether your company must comply.

It is important to understand that the Hazardous Materials Registration requirements apply to a "person," which includes each separate corporation, partnership, or association. Registration is not required for each vehicle that you operate or for each facility or terminal you own or operate.

We have tried to remove duplicate address records for single companies from the mailing. However, when working from lists from different sources, it is difficult to eliminate multiple entries. Further, some of our sources are site-specific, and determining which site address represents the principal place of business of each "person" or company is not always possible. Consequently, this letter may have been sent to more than one location for a single company or "person." We regret any inconvenience this may cause.

Where Do Your Registration Fees Go?

Hazardous Materials Emergency Preparedness (HMEP)
Grants Program
Fiscal Year 1999



REGISTERING AS AN OFFEROR OR TRANSPORTER OF HAZARDOUS MATERIALS

U.S. DEPARTMENT OF TRANSPORTATION

Hazardous Materials Registration Program

Instructions & Form DOT F 5800.2
For Registration Year 2000 - 2001

Revised Requirements Effective July 1, 2000

IMPORTANT CHANGES

The following changes apply for the 2000-2001 Registration Year, which begins on July 1, 2000:

- Registration is now required for each person that offers or transports **any shipment of hazardous materials that requires placarding** (with an exception for farmers offering or transporting hazardous materials in direct support of their farming activities). Registration is still required by each person (including a farmer) engaged in any of the five categories of activities that previously triggered the registration requirement. See page 2 for an explanation of the term "person," the activities that require registration, and the exceptions to the requirement.
- The annual registration fee is $300 for each person meeting the Small Business Administration's criteria for a small business and $2,000 for each person that does not meet those criteria. See page 4 for information on how to determine if you are a small business.
- You may now register for one, two, or three registration years by completing a single registration statement and paying the appropriate fees. The fees listed include a $25 administrative fee for each filing. By submitting a form and payment for two or three years, you save on the administrative portion of the fee. A single Certificate of Registration with a Registration Number good for one, two, or three years will be issued for each statement.

You may register by using one of the following methods:

- Complete form DOT F 5800.2 (revised 3/00) and mail it with payment of the appropriate fee to the address given on the printed form.
- Register by telephone through the expedited procedures described on pages 7 - 8 of this brochure.
- Register through the Internet as explained on page 8 of this brochure.

INTRODUCTION: Background and Uses of the Fee

Under the federal hazardous material transportation law (49 U.S.C. 5101 *et seq.*), certain offerors and transporters of hazardous materials, including hazardous waste, are required to file a registration statement with the U.S. Department of Transportation and to pay an annual fee. This program began in 1992 and is administered by the Associate Administrator for Hazardous Materials Safety, Research and Special Programs Administration (RSPA). The registration regulations are found at 49 CFR 107.601-107.620.

The fee provides funds for grants distributed to states and Indian tribes for hazardous materials emergency response planning and training through the Hazardous Materials Emergency Preparedness Grants Program. For use in FY 2000, 50 states, the District of Columbia, five territories, and eight Indian tribes received grant awards totaling $8.51 million. These grants support planning and training of emergency personnel to respond to incidents involving hazardous materials. Since 1993 the grants have been used to train, in part, approximately 120,000 emergency responders each year. In addition, $750,000 in grants have been made to the International Association of Fire Fighters to support their hazardous materials instructor train-the-trainer program. The fees are also used to publish the *Emergency Response Guidebook*. **Your fee is helping communities prepare for a spill, accident or other hazardous materials emergency that may occur.**

U.S. Department of Transportation
Research and Special Programs Administration

SCHN00246905

WHO MUST REGISTER

If you are a person* as defined by the federal hazardous material transportation law and engage in any of the activities requiring registration, you must register. See the discussion of person below for exceptions to the requirement.

*Underlined words are defined on pages 2 - 4.

Activities Requiring Registration:

A person who, between July 1 of a year and June 30 of the following year, engages in any of the following activities must register with RSPA for that twelve- month period.

1. Offers or transports in commerce a quantity of hazardous material that requires placarding. This category of activities requiring registration was added beginning with the 2000-2001 registration year. On the Registration Statement, this activity is identified as Category F. The offering and transporting of hazardous materials by farmers in direct support of their farming operations are excepted from this category of activities requiring registration. See the section "Requirements for Farmers" on page 3.
2. Offers or transports in commerce any of the following (Note: the letters identifying each of the following sections represents the "Category" of activity used on the Registration Statement):
   A. A highway route controlled quantity of a Class 7 (radioactive) material, as defined in 49 CFR 173.403.
   B. More than 25 kilograms (55 pounds) of a Division 1.1, 1.2, or 1.3 (explosive) material (see 49 CFR 173.50) in a motor vehicle, rail car, or freight container.
   C. More than one liter (1.06 quarts) per package of a "material extremely toxic by inhalation" (that is, a "material poisonous by inhalation," as defined in 49 CFR 171.8, that meets the criteria for "hazard zone A" as specified in 49 CFR 173.116(a) for gases or 173.133(a) for liquids).
   D. A hazardous material (including hazardous wastes) in a bulk packaging (see 49 CFR 171.8) having a capacity equal to or greater than 13,248 liters (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids (see definition of "Bulk Packaging" for further clarification). Please note that under this provision persons who offer or transport hazardous materials that do not require placarding (that is, Class 9 materials) in a bulk packaging with a capacity greater than 3,500 gallons or 468 cubic feet, must register.
   E. A shipment in other than a bulk packaging of 2,268 kilograms (5,000 pounds) gross weight or more of one class of hazardous materials (including hazardous wastes) for which placarding of a vehicle, rail car, or freight container is required for that class (see definition of "Bulk Packaging" for further clarification).

Person:

A person is defined by federal hazardous material transportation law as including an individual, firm, copartnership, corporation, company, association, joint-stock association, including any trustee, receiver, assignee, or similar representative thereof, or government, Indian tribe, or agency or instrumentality of any government or Indian tribe when it offers hazardous materials for transportation in commerce or transports hazardous materials to further a commercial enterprise. However, the following are specifically excepted by statute or regulation from the registration requirements:

A. Agencies of the federal government.
B. Agencies of states.
C. Agencies of political subdivisions of states.
D. Employees of those agencies listed in [A], [B], or [C] with respect to their official duties.
E. Hazmat employees, including the owner-operator of a motor vehicle that transports hazardous materials in commerce if that vehicle, at the time of those activities, is leased to a registered motor carrier under a 30-day or longer lease as prescribed in 49 CFR Part 376 or an equivalent contractual relationship.
F. Persons domiciled outside the United States whose only activity involving the transportation of hazardous materials within the United States is to offer hazardous materials for transportation in commerce from locations outside the United States, if the country in which they are domiciled does not impose registration or a fee upon U.S. companies for offering hazardous materials into that country. However, persons domiciled outside the United States who transport the types and quantities of hazardous materials that require registration within the United States must register.
G. Farmers, as defined in 49 CFR 171.8, who offer or transport only hazardous materials that are used in direct support of their farming operations **and** who are not engaged in activities included in 49 CFR 107.601(a)(1) through (a)(5), that is, Categories A through E described in "Activities Requiring Registration" above. See "Requirements for Farmers" on page 3.

Clarifications:

The registration requirement applies to all persons who (1) engage in interstate, intrastate, or foreign commerce; (2) engage in any of the activities discussed in "Activities Requiring Registration" above; and (3) are not specifically excepted from the requirement.

Each person who acts as an intermediary in the transportation of hazardous materials, such as a freight-forwarder or agent, is subject to the registration requirements if that person performs or contracts to perform any of the functions of an offeror of hazardous materials.

Each U.S. company engaged in a specified hazardous materials activity that is (1) incorporated separately from a parent company, (2) under the majority stock ownership of another company, or (3) a wholly-owned or controlled subsidiary of another company, is required to register even when the parent company is also subject to registration.

You must also register if you engage in any of the activities discussed in "Activities Requiring Registration" above, and are:

1. A merchant vessel carrier transporting, transiting, or transhipping hazardous materials within 12 miles of the U.S. coast;
2. A federal, state, or local government contractor.

SCHN00246906

Requirements for Farmers:

1. If you are a farmer who offers or transports only hazardous materials that (a) are to be used in direct support of your farming activities **and** (b) are not included in section 2 of "Activities Requiring Registration" above (that is, Categories A through E on the Registration Statement), you are not required to register.
2. If you are a farmer who offers or transports hazardous materials that require placarding that are **not** in direct support of your farming operation, you must register and pay the appropriate registration fee. For example, a farmer who offers or transports home heating fuel for commercial purposes in quantities requiring placarding must register.
3. If you are a farmer who offers or transports for any purpose any of the hazardous materials included in section 2 of "Activities Requiring Registration" above (Categories A through E on the Registration Statement), you must register and pay the appropriate registration fee. For example, if you transport 55 lbs or more of a Division 1.1 explosive, even if the explosive is to be used in direct support of your farming operations, you must register.

DEFINITIONS

Bulk Packaging:

A bulk packaging is a packaging, other than a vessel or a barge, with (1) a maximum capacity greater than 450 liters (119 gallons) as a receptacle for a liquid; (2) a maximum net mass greater than 400 kilograms (882 pounds) and a maximum capacity greater than 450 liters (119 gallons) as a receptacle for a solid; or (3) a water capacity greater than 454 kilograms (1000 pounds) as a receptacle for a gas (see 49 CFR 171.8).

The extension of the registration requirement to all placarded shipments will in most instances over-ride categories D and E, which define activities that require registration involving (1) any hazardous material in a bulk packaging with a capacity equal to or greater than 13,248 liters (3,500 gallons) for liquids and gases or more than 13.24 cubic meters (468 cubic feet) for solids (category D), or (2) any shipment in other than a bulk packaging of 2,268 kilograms (5,000 pounds) gross weight or more of a class of hazardous materials for which placarding of a vehicle, rail car, or freight container is required (category E). Hazardous materials (particularly Class 9 hazardous wastes) that do **not** require placarding but **are** placed in bulk packagings with capacities greater than 3,500 gallons or 468 cubic feet require registration under category D. However, shipments of hazardous materials that do **not** require placarding (for example, Class 9 materials), placed in bulk packagings with capacities **less than** 3,500 gallons or 468 cubic feet, do **not** require registration.

It is still important to note that the use of bulk packagings with capacities equal to or greater than 13,248 liters (3,500 gallons) or more than 13.24 cubic meters (468 cubic feet) requires registration no matter how small the quantity of hazardous materials offered or transported. For example, persons who have hazardous waste picked up in tank trucks with such capacities, and persons who return unpurged tank trucks or rail tank cars from which they have unloaded hazardous materials so that the tanks still contain residues of hazardous materials when returned, must register under the provisions of Category D.

Calendar Year:

Although the registration year extends from July 1 of a year through June 30 of the following year, a calendar year is used to report activity in item 7 of the registration statement, "Prior-Year Survey Information." This calendar year is the twelve-month period (January 1 through December 31) immediately preceding the beginning date of the registration year (or years) for which you are filing the registration statement. You are asked to supply information on your activities in calendar year 1999 on the statement submitted for 2000-2001 (or 2000-2002, or 2000-2003). The use of the preceding calendar year in reporting activity provides a definite and verifiable (rather than speculative) basis for this section of the form.

Employees, Number of:

See "Small Business" below.

Farmer:

The term "farmer" means a person engaged in the production or raising of crops, poultry, or livestock (49 CFR 171.8).

Gross Annual Receipts:

See "Small Business" below.

Highway Route Controlled Quantity:

The criteria for determining whether a shipment of radioactive material is a "highway route controlled quantity" are found in 49 CFR 173.403, which further references 49 CFR 173.435. Please note that any shipment of a "highway route controlled quantity" of a radioactive material, whether by highway, rail, air, or water, subjects the offeror and carrier to the registration requirement.

If you think you are an offeror or carrier of highway route controlled quantities, please review the defining criteria carefully. Shipments of highway route controlled quantities must be specifically identified as such by the offeror on the shipping papers (see 49 CFR 172.203(d)(4)).

Modes:

The four modes of transportation that are covered under the Hazardous Materials Regulations, including the registration requirement, are highway, rail, air, and water. For purposes of registration, highway transportation includes all interstate, intrastate, and foreign shipments that meet the registration criteria and are not specifically excepted by regulation. Water transportation does not include hazardous materials loaded or carried on board a vessel without benefit of containers or labels. This type of shipment, for which the vessel becomes the container, such as LNG or oil tanker vessels, falls under the authority of the U.S. Coast Guard. See the delegation of authority at 49 CFR 1.46(t).

Offeror:

An offeror is a person who ships hazardous materials in commerce, or a person who acts as an intermediary in the transportation of hazardous materials (such as a freight-forwarder or agent) if the intermediary performs any of the functions of an offeror of hazardous materials. Functions of an offeror, besides shipping, include, but are not limited to: selecting the packaging for a regulated hazardous material, physically transfering a hazardous material to a carrier, determining the hazard class of a hazardous material, preparing shipping papers, reviewing shipping papers to verify compliance with the hazardous materials regulations or their international

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equivalents, signing hazardous materials certifications on shipping papers, placing hazardous materials markings or placards on vehicles or packages, and providing placards to a carrier.

A formal interpretation of the terms "offeror" and "transporter" as related to the registration requirements was published in the Federal Register on October 28, 1992, pages 48739 - 48741.

Further clarification of the term "offeror" was supplied in the Final Rule published in the Federal Register on February 14, 2000, page 7304. In item 7 of the registration statement, you are asked to indicate whether you operated as a "Shipper," "Carrier," or "Other" during the calendar year preceding the beginning of the registration year. Persons who act as intermediaries should mark "Other" (marking "Shipper" or "Carrier" as well if appropriate).

Shipment:

The term "shipment" as used in the registration regulations means the offering or loading of hazardous material at one loading facility using one transport vehicle, or the transport of that transport vehicle (see 49 CFR 107.601(c)).

Small Business:

A company is a "small business" if it meets the criterion established by the U.S. Small Business Administration (SBA) in 13 CFR 121 for the Standard Industrial Classification (SIC) code that describes the primary commercial activity of the company. A complete list of SBA criteria by SIC code can be found at the SBA Internet site at http://www. sbaonline.sba.gov/regulations/siccodes/. Or call the SBA Office of Advocacy at 202-205-6533 for assistance. A link to the SBA site is provided at the Registration Internet page. A list of the SIC codes and size criteria for some common hazardous materials industry groups is given on page 12. With a few exceptions, the criterion is either the number of employees or the gross annual receipts. The number of employees is defined by SBA as being the average number of employees (including all individuals employed on a full-time, part-time, temporary, or other basis) employed during the pay periods in the preceding twelve months. See 13 CFR 121.106 for the applicable SBA definition. "Gross annual receipts" is defined by SBA at 13 CFR 121.104. "Receipts" means "total income" (or in the case of a sole proprietorship, "gross income") plus the "cost of goods sold" as these terms are defined or reported on Internal Revenue Service (IRS) federal tax returns. The term, however, excludes net capital gains or losses, taxes collected for and remitted to a taxing authority if included in gross or total income, and proceeds from the transactions between a concern and its domestic or foreign affiliates (if also excluded from gross or total income on a consolidated return filed with the IRS). If your company has been in business for three or more years, the "annual receipts" is the receipts over its last three completed fiscal years divided by three. For companies in existence less than three years, the "annual receipts" is calculated by taking the receipts for the period the company has been in business divided by the number of weeks in business, multiplied by 52. Whether annual receipts or number of employees is the criterion established for your SIC code, you should look at the receipts or number of employees for the "person" required to register. The "person" required to register may be smaller than the "entity" (including affiliates) the SBA considers in applying its criteria for its internal purposes.

Standard Industrial Classification (SIC):

The SBA criteria for "small business" are established for each standard industrial classification (SIC) code. If a company engages in more than one business activity (industry), the SIC code for the primary industry is the one that should be used. To determine a company's primary industry, the SBA considers the distribution of receipts, employees and costs of doing business among the different industries in which business operations occurred for the most recently completed fiscal year. Companies unsure of their SIC codes may refer to the U.S. Occupational Safety and Health Administration's search engine for detailed descriptions of the businesses included in each classification. The search engine is at http://www.osha.gov/oshstats/sicser.html. A link to this site is provided at the Registration Internet page.

Transportation:

Transportation means the movement of property and any loading, unloading, or storage incidental to the movement (49 U.S.C. 5102 (12)).

REGISTRATION DEADLINE

The completed 2000-2001 registration statement and payment must be submitted before July 1, 2000, or before engaging in any of the activities requiring registration, whichever is later. We suggest that you submit your registration at least four weeks in advance of the date you will need the registration certificate in order to allow sufficient time for the registration to be processed and the certificate produced and mailed to you. If you need to obtain a registration number immediately, see the instructions for "Expedited Registration" on pages 7-8 or for "Registering through the Internet" on page 8.

RECORDKEEPING REQUIREMENTS

Copies of the registration statement and the certificate of registration must be kept for three years at your principal place of business and must be available for inspection. Motor carriers and vessel operators must also have on board a copy of the current certificate of registration, or another document bearing the current year's registration number identified as the "U.S. DOT Hazmat Reg. No." Every truck or truck tractor or vessel you use for the transportation of hazardous materials that meets the registration criteria must have this proof of registration on board.

STATE REGISTRATIONS

Some states have hazardous materials registration or permitting programs that may also apply to you. Registration with RSPA does not replace state requirements.

USE THE PROPER REGISTRATION STATEMENT

You must use the Registration Statement, Form DOT F 5800.2 (Revised 3/00), supplied in this brochure, to register after May 1, 2000, no matter which year or years you are registering for. Statements submitted on versions of the form dated earlier than 3/00 will be returned unprocessed and will therefore delay your registration.

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PENALTIES FOR FAILURE TO REGISTER

The requirement to register with DOT is based on a federal law. The enforcement of this requirement is conducted cooperatively by federal, state, and local agencies. Federal, state, or local officials may impose penalties for failing to register or failing to meet the recordkeeping requirements.

REGISTERING AS A NON-RESIDENT

If you are not a resident of the United States, you must designate a permanent U.S. resident to serve as "agent for service of process" in accordance with 49 CFR 107.7. The name and address of your agent must be attached to the statement.

SOURCES OF INFORMATION

For Copies of this Brochure and Registration Forms:

- Download copies from the RSPA Registration Internet Home Page at http://hazmat.dot.gov/register.htm.
- Dial RSPA's automated Fax-on-Demand service at 1-800-467-4922. Press "2" and follow the instructions to request document number 700.
- E-mail your request to REGISTER@rspa.dot.gov.
- Call 617-494-2545 or 202-366-4109.

For Questions on the Registration Program Requirements:

- Call the Registration Program office at 202-366-4109.
- E-mail questions to REGISTER@rspa.dot.gov.

For Questions About the Hazardous Materials Regulations:

- Call the Hazardous Materials Information Center at 1-800-467-4922.

For Questions About the SBA Size Criteria:

- See the complete listing of SIC codes and size criteria at http://www.sbaonline.sba.gov/regulations/siccodes/.
- Call the SBA Office of Advocacy at 202-205-6533.

For Information on the HMEP Grants Program

- Visit the HMEP Grants Internet site at http://hazmat.dot.gov/hmep.htm.
- Call the Grants Program office at 202-366-0001.

For the Status of your Registration Submission:

- Call 617-494-2545.

For Expedited Registration:

- Call 1-800-942-6990.

Registering through the Internet:

- Register through the Internet at http://hazmat.dot.gov/register.htm as explained on page 8 of this brochure.

For Copies of the Hazardous Materials Program Regulations:

- Contact the Superintendent of Documents, Government Printing Office, Washington, DC 20402; telephone 202-512-1800. Ask for Title 49 of the Code of Federal Regulations, Parts 100 to 185.
- Access the Code of Federal Regulations through the Internet at http://www.access.gpo.gov/nara/cfr or http://hazmat.dot.gov/rules.htm.

To Obtain a U.S. DOT ID Number:

- Call the Federal Motor Carrier Safety Administration's Office of Motor Carriers Information Line at 1-800-832-5660.

IF YOU HAVE FAILED TO REGISTER FOR PAST YEARS . . .

If you engaged in any of the hazardous materials activities described in 49 CFR 107.601(a)(1) through (a)(5), that is, those listed on the statement as categories A through E, in registration years before 2000-2001, but did not register, you must do so now. There have been eight prior registration years:

1992-93 (September 16, 1992, to June 30, 1993);
1993-94 (July 1, 1993, to June 30, 1994);
1994-95 (July 1, 1994, to June 30, 1995);
1995-96 (July 1, 1995, to June 30, 1996);
1996-97 (July 1, 1996, to June 30, 1997);
1997-98 (July 1, 1997, to June 30, 1998);
1998-99 (July 1, 1998, to June 30, 1999); and
1999-2000 (July 1, 1999, to June 30, 2000).

You must file a registration statement and pay $300 for each year you did not register. For these prior years the fee amount is not determined by the SBA size criteria. You may copy and use the form supplied in this booklet to register for each previous year.

Complete the "Activities" and "States" sections of item 7 of the registration statement to reflect the type of activities you conducted and the states in which you conducted them during the calendar year preceding the beginning of the registration year for which the statement is being filed.

For example, if you are filing for the 1999-2000 registration year, report the activities you engaged in, and the states in which you offered or transported hazardous materials, between January 1 and December 31, 1998.

For Information about Hazardous Materials Safety:

- The Office of Hazardous Materials Safety's Internet homepage contains extensive information on the transportation of hazardous materials. Please visit our site at http://hazmat.dot.gov.

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REGISTRATION INSTRUCTIONS FOR OFFERORS AND TRANSPORTERS OF HAZMAT

Beginning with the 2000-2001 registration year, you may register for one, two, or three years through a single registration statement and the payment of the appropriate fees. You may register for the 2000-2001 registration year (July 1, 2000, through June 30, 2001), OR for the 2000-2001 and 2001-2002 registration years (July 1, 2000, through June 30, 2002), OR for the 2000-2001, 2001-2002, and the 2002-2003 registration years (July 1, 2000, through June 30, 2003). You may complete a registration statement (DOT Form F 5800.2 Revised 03/00), and send the statement with payment to the U.S. Department of Transportation at the address shown on the back of the form, or you may register through the Internet by following the directions on page 8.

Register before July 1, 2000, or before engaging in any of the activities requiring registration,* whichever is later. You must have the DOT certificate and registration number before you offer or transport hazardous materials. Allow four weeks after mailing your completed registration statement and payment to receive your certificate. You will receive a new registration number for each properly completed registration statement you submit.

The instructions for completing the registration statement form begin on this page and continue on page 7. You may find it useful to read through the instructions and the statement before completing it. These instructions may be useful in submitting your registration through the Internet, though the sequence of the required information is altered on the Internet registration page. Please fill in the top block before starting item 1.

*Underlined words are defined on pages 2 - 4.

TOP BLOCK

- Fill in the appropriate registration year or years. You may enter "2000-2001" (for one year), "2000-2002" (for two years) or "2000-2003" (for three years).
- Check the kind of registration you are making:

Initial Registration means you are registering for the first time. Since you have no registration number yet, leave the space for "Current Registration #" blank.

Renewal of Registration means you have registered in one or more previous years; please enter the most recently issued registration number you have been given as the "Current Registration #."

Amendment to Registration means you are updating information currently on file (which you must do if your name or principal place of business changes during the year). If you need instructions only for making this kind of change, skip to the box below.

Expedited Follow-up means you already made an expedited registration by phone and are providing follow-up data to that transaction. Enter the temporary registration number you received over the phone as the "Current Registration #." **If you check Expedited Follow-up, please turn to page 8 for special instructions on completing this form.**

IDENTIFYING INFORMATION

1 and 2. Enter your business name and address. This is the address to which the certificate of registration and any necessary correspondence will be mailed. If we have provided you with a pre-printed label and no corrections are necessary, you may use that label to supply this information.

3. If you have any of these ID numbers, enter them. Carriers who do not currently have an ID number and shippers may leave this space blank. (To verify your U.S. DOT ID number, call the Office of Motor Carriers Information Line at 1-800-832-5660.)

4. Check all the ways you moved hazardous materials during the calendar year ending last December. If you are a carrier, mark only the mode(s) you used to transport hazardous materials. If you are a shipper or other offeror, check all modes used to transport shipments offered by your company.

5. Enter the four-digit Standard Industrial Classification (SIC) code that best describes the primary business activity of your company. See the definition on page 4 for further help.

   Indicate whether your company meets the U.S. Small Business Administration's criteria for a small business. See the definition and the resources for help given on page 4. Apply the specified criterion (either the number of employees or the gross annual receipts) to the registering person.

REGISTRATION FEES AND PAYMENT INFORMATION

6. If your company meets the SBA criteria for a small business, the fee is $300 for one year, $575 for two years, or $850 for three years.

   If your company does not meet the SBA criteria for a small business, the fee is $2,000 for one year, $3,975 for two years, or $5,950 for three years.

   If your company is not a small business and is submitting an Expedited Follow-up, the remaining fee is $1,700.

AMENDING YOUR REGISTRATION

You must amend your registration statement within 30 days if there is a change in your company's name or principal place of business. You may submit an amendment through the registration Internet page at:

http://hazmat.dot.gov/register.htm

or by following these directions:

Check "Amendment to Registration" on the top block of the registration statement, enter the "Current Registration #," record the new name or address in items 1 and 2, and complete and sign item 8, CERTIFICATION OF INFORMATION. You need not fill in any other sections.

Attach a copy of the original certificate of registration to the amended form. Send the amendment to the Atlanta, Georgia, address printed on the form.

There is no additional fee for filing an amendment whether done by mail or through the Internet.

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If you are registering for a year prior to 2000-2001, the fee is $300 whether or not your company meets the SBA's criteria for a small business.

Either:

a. Enclose a check or money order, identified as Hazmat Registration Fee, and drawn on a U.S. bank in U.S. funds, payable to "U.S. Department of Transportation" OR

b. Pay by VISA, MasterCard, American Express, or Discover by completing the credit card payment block on the form.

Registration and full fee payment are required of any person engaging in any of the specified activities at any time during the registration year. The fee is not prorated for registrations submitted after July 1.

HAZARDOUS MATERIALS ACTIVITIES

7. Use this part of the form to record your hazardous materials activities during the calendar year ending last December 31. Even if you engaged in none of the hazardous materials activities described here last year, but you intend to do so this year, you must register and pay the appropriate fee (mark category G).

   Item 7 defines six categories of materials subject to registration. Mark each category that your company engaged in during the last completed calendar year. Shipments of materials included in Categories A, B, C, D, or E should not also be included in Category F, even though in most instances such shipments require placarding. For instance, if your only hazardous materials activity is carrying more than 55 lbs. of Division 1.1 explosives, you should mark only Category B - not B and F. If, however, your only activity is shipping hazardous materials in quantities that require placarding that are not included in Categories A through E, mark Category F. If you carry both shipments of more than 55 lbs. of Division 1.1 explosives and shipments of hazardous materials not included in Categories A through E, not in bulk packagings, of more than 1,000 lbs. but less than 5,000 lbs., you would mark both Categories B and F. If you are registering for a year prior to 2000-2001, you should not mark Category F even if you engaged in that activity during the applicable preceding calendar year. Activity in Category F requires registration only beginning in Registration Year 2000-2001.

   For each of the categories A, B, C, D, E, or F, that you marked, also tell us - for each one:

   (1) Activities: Whether you handled the hazardous materials as a shipper, carrier, or "other." Check as many as apply. "Other" refers to activities other than those of the "shipper" or "carrier" in which any of the functions of an offeror or carrier are performed. See the definition of "Offeror" on pages 3 - 4.

   (2) States: Which states you operated in with respect to this hazardous material. Circle the abbreviation for each state or territory in which you did business in hazardous materials. If you checked "carrier," circle all states in which you operated as a carrier of that category of hazardous material. If you checked "shipper" or "other," circle only those states from which you offered hazardous materials - you need not indicate states to which or through which the materials were transported. Registrants operating in all of the "lower 48" states may circle "48 Contiguous States." (This excludes Alaska, Hawaii, the District of Columbia, and our five territories, which must be circled individually, if appropriate.) A list of the states and territories and their abbreviations is provided on page 11.

   Remember, if you did not engage last year in any of the activities described in categories A through F, check category G.

CERTIFICATION OF INFORMATION

8. Your signature in item 8 certifies that the information on this form is true, accurate, and complete. BE ADVISED that false statements may violate the law (18 U.S.C. 1001). Complete this part with the signer's name, title, and telephone number and the date the certification is signed. The individual who signs this certification should be an appropriate representative of the registrant. Correspondence regarding registration, including the certificate of registration and next year's form and instructions, will be addressed to this individual.

MAILING INSTRUCTIONS

Mail your completed registration form (one copy) and payment together to this address in Atlanta:

U.S. Department of Transportation
Hazardous Materials Registration
P.O. Box 740188
Atlanta, GA 30374-0188

Do not send them to Washington, D.C. Be sure to mail form and payment **together**.

Be careful to use a mail service that delivers to P.O. Box addresses. (The Atlanta address is a post office box and many services cannot deliver to P.O. Boxes.)

Allow four weeks to receive your certificate of registration.

EXPEDITED REGISTRATION

If you need to register more quickly than the normal procedures provide, you may do so by telephone with credit card payment of an initial $350 fee, which includes an additional $50 expedited registration fee. For registrants that meet the SBA criteria for a small business, this $350 fee will be accepted as full payment of a single-year registration. For registrants that do not meet the SBA criteria for a small business, payment of an additional $1,700 must be made as part of the follow-up procedures (for a full payment of $2,050, which includes a $50 expedited registration fee). You may register only for a single year through the expedited procedures. You will be provided with a temporary registration number, which can be used for 45 days to prove compliance with the registration requirement. To obtain a registration number promptly, you may also register over the Internet (see page 8). No additional processing fee is required for registration over the Internet.

To register by telephone, please do the following:

1. Call (800) 942-6990 or (617) 494-2545 for service 24 hours a day, 7 days a week. Be ready to provide your company name, the mailing address of the principal place of business, and valid VISA, Mastercard, American Express, or Discover information. Your credit card account will be billed for $350 and payment will be confirmed while you are on the phone.

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2. A DOT registration specialist will provide a temporary registration number over the phone, which is good for proving compliance for 45 days from the date of your call. DOT will mail a temporary registration letter that serves as proof of payment of the fee, along with a copy of the registration statement for you to complete. You must complete the statement and return it to the address given in the letter within 10 days of receiving the registration package. Follow the special instructions for "Expedited Follow-Up" below and given in the letter. If your company meets the SBA criteria for a small business, do not resubmit credit card information or send another payment. If your company does not meet the SBA criteria for a small business, you must either submit credit card information or enclose a check or money order for $1,700 to complete the payment of the appropriate fee.
3. A certificate of registration with the current registration number will be sent to you. Use this number to replace the temporary number given to you over the phone.

Because the expedited procedures allow only single-year registrations, and involve the later payment of the remaining $1,700 fee if your company does not meet the SBA criteria for a small business, we suggest that registration through the Internet may be a more convenient means of obtaining a registration number immediately.

REGISTERING THROUGH THE INTERNET

You may register over the Internet at http://hazmat.dot.gov/register.htm. Follow the link to Registering Through the Internet, and read the instructions about using the hazardous materials e-commerce services. Your browser must support 128-bit encryption to complete payment transactions over the Internet. A means to check your current browser is provided for your convenience. If you need to update your browser to one that supports 128-bit encryption, links to sites from which one can be downloaded are provided on that page. Once you have verified that your browser will allow you to complete the transaction, proceed to the hazardous materials e-commerce page and select "Registration Application." On the Internet registration page, if you have previously registered, you can search for your company's existing registration records by a previous registration number or the company name, or from a list of companies with the zip code in which your principal place of business is located. Searches by previous registration numbers are recommended. Having located your company record, you will have an opportunity to update any company information, and to complete the statement. If you are a first-time registrant, you must fill in the company information on the Registration Statement. You can register for one, two, or three years, beginning with the 2000-2001 registration year. You may make the appropriate payment by Visa, MasterCard, American Express, or Discover. The completed Statement may be printed out to be retained at your principal place of business to fulfill part of the recordkeeping requirements. At the end of the process, after the payment has been verified, you will be able to print your Certificate of Registration with the new registration number. We will mail you a copy of the Certificate to make sure that you have a copy, but we recommend that you print it out from the Internet page as well. There is no additional charge for registering over the Internet, and we recommend this process, especially if you are in immediate need of a registration number. The instructions and discussions in this brochure apply to registering through the Internet, though the order in which some of the information is collected may vary.

You may also submit an amendment to your current registration through the Internet. By searching for your company's records you may also use this service to check on your company's history of registrations and check for current and past registration numbers. There are no charges for looking up your company's records or for submitting an amendment.

Expedited Follow-Up

Special Instructions For Completing Expedited Registration

[For Those Who Have Made Expedited Registration By Phone And Have Paid The $350 Initial Expedited Registration Fee]

FOLLOW THESE INSTRUCTIONS CAREFULLY TO AVOID DELAY

1. Check "Expedited Follow-up" in the top block and enter your temporary registration number in the space for "Current Registration #."
2. Complete items 1 through 8. In item 6 enter "0" for the "Total Amount Enclosed" if your company meets the SBA criteria for a small business, or "$1,700" if your company does not meet the SBA criteria for a small business. If the "Total Amount Enclosed" is $0, do not resubmit credit card information.
3. Send the completed statement and any necessary payment to DOT at the address in Cambridge, MA, given in the temporary registration letter.
4. Include a copy of the temporary registration letter with this submission as proof of payment of the initial $350 fee.

DOT will mail a certificate of registration with your current registration number for the year as confirmation that your registration process is complete. Use this number to replace the temporary number for all subsequent purposes.

You must respond within 10 days of receipt of the temporary registration letter.

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Exempted from Paperwork Reduction Act by 49 U.S.C. 5108(i)

U. S. DEPARTMENT OF TRANSPORTATION
HAZARDOUS MATERIALS REGISTRATION STATEMENT
REGISTRATION YEAR 20____ - 20____

(Please Type or Print all Responses)

Initial Registration ____ Renewal of Registration ____ Amendment to Registration ____ Expedited Follow-up ____

Current Registration # _ _ _ _ _ _ _ _ _ _ _ _ _ _

1. **Registrant** _____
(Company Name)

(Place pre-printed label here if provided and if name and address are correct. Otherwise, provide correct information.)

2. **Mailing Address of Principal Place of Business**

Street or P.O. Box _____ City _____

County _____ State _ _ Zip Code _ _ _ _ _ - _ _ _ _ Country _____

3. **Carrier's US DOT ID Number, ICC Number, or Reporting Railroad Alphabetic Code (if applicable)**

US DOT ID #_____ ICC # _____ Railroad Alphabetic Code _____

4. **Mode(s) Used to Transport Hazardous Materials:** Highway ____ Rail ____ Water ____ Air ____

5. **Business Size**

Standard Industrial Classification (SIC) Code for Primary Commercial Activity (enter one four-digit code):_____

Using the SBA definition criterion for the SIC code entered above, mark one:

_____Small Business as defined by SBA

_____Not an SBA Small Business

6. **Registration Fees**

	1 Year 2000-2001	2 Years 2000-2002	3 Years 2000-2003
If registrant is a **Small Business**, the fee is: If a follow-up to an expedited registration, no amount is due.	$300 0	$575 NA	$850 NA
If registrant is **Not a Small Business**, the fee is: If a follow-up to an expedited registration, the amount due is	$2,000 $1,700	$3,975 NA	$5,950 NA
If registration is for a year prior to 2000-2001, the fee for each year is $300			

Total Amount Enclosed:_____

Make check or money order in U.S. funds, drawn on a U.S. bank, and payable to "U.S. Department of Transportation," and identified as payment for the "Hazmat Registration Fee."

Method of Payment

Check ____ Money Order ____ Credit Card: *VISA* ____ *MasterCard* ____ *American Express* ____ *Discover* ____

Credit Card Users Please Provide the Following Information:

Card Number: [ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ] Expiration Date: [ ][ ] MO [ ][ ] YR

Name as it appears on the card _____

Authorized Signature _____

Cardholder acknowledges ordering goods or services in the amount of the total shown hereon and agrees to perform the obligations set forth in the Cardholder's agreement with the issuer. Credit card statement will list this payment as "US DOT Hazmat Regis."

NOTE: If a **Small Business** completing an expedited registration, **do not** resubmit credit card information here.

7. Prior-Year Survey Information. Mark all categories and activities engaged in during the previous calendar year (e.g., 1999 for the 2000-2001 Registration Year) and the state(s) in which you operated (see instructions).

A. ____ Offered or transported in commerce a highway route controlled quantity of a Class 7 (radioactive) material.

1. Shipper ____ 2. Carrier ____ 3. Other (Freight Forwarder, Agent, etc.) ____

AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN
MO MS MT NC ND NE NH NJ NM NV NY OH OK OR PA RI SC SD TN TX UT
VT VA WA WV WI WY 48 Contiguous States AK AS DC GU HI MP PR VI

B. ____ Offered or transported in commerce more than 25 kilograms (55 pounds) of a Division 1.1, 1.2, or 1.3 (explosive) material in a motor vehicle, rail car, or freight container.

1. Shipper ____ 2. Carrier ____ 3. Other (Freight Forwarder, Agent, etc.) ____

AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN
MO MS MT NC ND NE NH NJ NM NV NY OH OK OR PA RI SC SD TN TX UT
VT VA WA WV WI WY 48 Contiguous States AK AS DC GU HI MP PR VI

C. ____ Offered or transported in commerce more than 1 liter (1.06 quarts) per package of a material extremely toxic by inhalation (materials poisonous by inhalation that meet one of the defining criteria for Hazard Zone A).

1. Shipper ____ 2. Carrier ____ 3. Other (Freight Forwarder, Agent, etc.) ____

AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN
MO MS MT NC ND NE NH NJ NM NV NY OH OK OR PA RI SC SD TN TX UT
VT VA WA WV WI WY 48 Contiguous States AK AS DC GU HI MP PR VI

D. ____ Offered or transported in commerce a hazardous material (including a hazardous waste) in a bulk packaging (see 49 CFR 171.8) having a capacity equal to or greater than 13,248 liters (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids.

1. Shipper ____ 2. Carrier ____ 3. Other (Freight Forwarder, Agent, etc.) ____

AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN
MO MS MT NC ND NE NH NJ NM NV NY OH OK OR PA RI SC SD TN TX UT
VT VA WA WV WI WY 48 Contiguous States AK AS DC GU HI MP PR VI

E. ____ Offered or transported in commerce a shipment, in other than a bulk packaging, of 2,268 kilograms (5,000 pounds) gross weight or more of one class of hazardous material (including a hazardous waste) for which placarding of a vehicle, rail car, or freight container is required.

1. Shipper ____ 2. Carrier ____ 3. Other (Freight Forwarder, Agent, etc.) ____

AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN
MO MS MT NC ND NE NH NJ NM NV NY OH OK OR PA RI SC SD TN TX UT
VT VA WA WV WI WY 48 Contiguous States AK AS DC GU HI MP PR VI

F. ____ Offered or transported in commerce a shipment of a quantity of hazardous material that requires placarding of the bulk packaging, freight container, unit load device, transport vehicle, or rail car, other than those included in A through E above. Activities performed by farmers are generally excepted. See 49 CFR 107.601(b).

1. Shipper ____ 2. Carrier ____ 3. Other (Freight Forwarder, Agent, etc.) ____

AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN
MO MS MT NC ND NE NH NJ NM NV NY OH OK OR PA RI SC SD TN TX UT
VT VA WA WV WI WY 48 Contiguous States AK AS DC GU HI MP PR VI

G. ____ Did not engage in any of the activities listed in A through F during the previous calendar year.

8. Certification of Information. I certify that, to the best of my knowledge, the above information is true, accurate, and complete.

Certifier's Name _____ Date _____
(Print the signer's name)

Title _____ Phone (___ ___)___ ___-___ ___ ___ ___

Certifier's Signature _____

FALSE STATEMENTS MAY VIOLATE 18 U.S.C. 1001.

MAIL COMPLETED FORM WITH PAYMENT TO:

U.S. Department of Transportation
Hazardous Materials Registration
P.O. Box 740188
Atlanta, GA 30374-0188

Please retain a copy of this form for your records.

SCHN00246914

Two Letter State Abbreviations

Alabama	AL	Kentucky	KY	Ohio	OH
Alaska	AK	Louisiana	LA	Oklahoma	OK
American Samoa	AS	Maine	ME	Oregon	OR
Arizona	AZ	Maryland	MD	Pennsylvania	PA
Arkansas	AR	Massachusetts	MA	Puerto Rico	PR
California	CA	Michigan	MI	Rhode Island	RI
Colorado	CO	Minnesota	MN	South Carolina	SC
Connecticut	CT	Mississippi	MS	South Dakota	SD
Delaware	DE	Missouri	MO	Tennessee	TN
Dist. Columbia	DC	Montana	MT	Texas	TX
Florida	FL	Nebraska	NE	Utah	UT
Georgia	GA	Nevada	NV	Vermont	VT
Guam	GU	New Hampshire	NH	Virgin Islands	VI
Hawaii	HI	New Jersey	NJ	Virginia	VA
Idaho	ID	New Mexico	NM	Washington	WA
Illinois	IL	New York	NY	West Virginia	WV
Indiana	IN	North Carolina	NC	Wisconsin	WI
Iowa	IA	North Dakota	ND	Wyoming	WY
Kansas	KS	N. Mariana Is.	MP		

REGISTRATION PHONE NUMBERS

Hazardous Materials Registration Program

Form and Instructions	(617) 494-2545
Automated Fax-on-Demand service for brochure and form (request document 700)	(800) 467-4922
Four Weeks and No Certificate?	(617) 494-2545
Registration Information and Answers	(202) 366-4109
General Hazardous Materials Information - Hazardous Materials Information Center	(800) 467-4922
Expedited Registration	(800) 942-6990
Verify U.S. DOT ID Number (FMCSA/OMC)	(800) 832-5660
SBA Size and SIC Code Questions (SBA)	(202) 205-6533
Copy of Relevant Regulations (49 CFR Parts 100 to 185)	(202) 512-1800

SCHN00246915

Selected Small Business Administration Size Standards by SIC Industry

NOTE: If the four-digit code for your primary industry group does not appear below, check the SBA Internet site at http://www.sbaonline.sba.gov/regulations/siccodes/ for the complete listing of codes and size criteria.

SIC	Description	Size Standards in Number of Employees or Millions of Dollars
Division A - AGRICULTURE, FORESTRY AND FISHING (Major Groups 01- 09)		
Division B - MINING (Major Groups 10 -14)		
Division C - CONSTRUCTION (Major Groups 15 -17)		
Division D - MANUFACTURING (Major Groups 20 - 39)		
Major Group 28 - CHEMICALS AND ALLIED PRODUCTS		
Major Group 29 - PETROLEUM REFINING AND RELATED INDUSTRIES		
2911	Petroleum Refining	1,500
2992	Lubricating Oils and Greases	500
Division E - TRANSPORTATION, COMMUNICATIONS ELECTRIC, GAS, AND SANITARY SERVICES (Major Groups 40 - 49)		
Major Group 40 - RAILROAD TRANSPORTATION		
4011	Railroads, Line-Haul Operating	1,500
4013	Railroad Switching and Terminal Establishments	500
Major Group 42 - MOTOR FREIGHT TRANSPORTATION AND WAREHOUSING		
4212	Local Trucking Without Storage	$18.5
	EXCEPT Garbage and Refuse Collection, Without Disposal	$6.0
4213	Trucking, Except Local	$18.5
4214	Local Trucking With Storage	$18.5
4225	General Warehousing and Storage	$18.5
4226	Special Warehousing and Storage, N.E.C.*	$18.5
Major Group 47 - TRANSPORTATION SERVICES		
4731	Arrangement of Transportation of Freight and Cargo	$18.5
Major Group 49 - ELECTRIC, GAS, AND SANITARY SERVICES		
4953	Refuse Systems (includes hazardous waste disposal sites)	$6.0
Division F - WHOLESALE TRADE (Major Groups 50 - 51)		
Major Group 51 - WHOLESALE TRADE - NONDURABLE GOODS		
5169	Chemical and Allied Products, N.E.C.*	100
5171	Petroleum Bulk Stations and Terminals	100
5172	Petroleum and Petroleum Products Wholesalers, except Bulk Stations and Terminals	100
5191	Farm Supplies	100
Division G - RETAIL TRADE (Major Groups 52 -59)		
Major Group 54 - FOOD STORES		
5411	Grocery Stores	$20.0
Major Group 55 - AUTOMOTIVE DEALERS AND GASOLINE SERVICE STATIONS		
5541	Gasoline Service Stations	$6.5
Major Group 59 - MISCELLANEOUS RETAIL		
5983	Fuel Oil Dealers	$9.0
5984	Liquefied Petroleum Gas (Bottled Gas) Dealers	$5.0
5989	Fuel Dealers, N.E.C.*	$5.0
Division H - FINANCE, INSURANCE, AND REAL ESTATE (Major Groups 60 - 67)		
Division I - Services (Major Groups 70 - 87)		
Major Group 72 - PERSONAL SERVICES		
7215	Coin-Operated Laundries and Drycleaning	$5.0
7216	Drycleaning Plants, Except Rug Cleaning	$3.5
Major Group 73 - BUSINESS SERVICES		
7342	Disinfecting and Pest Control Services	$5.0
Major Group 75 - AUTOMOTIVE REPAIR SERVICES AND PARKING		
7538	General Automotive Repair Shops	$5.0
Major Group 80 - HEALTH SERVICES		
8062	General Medical and Surgical Hospitals	$5.0
8071	Medical Laboratories	$5.0
Major Group 82 - EDUCATIONAL SERVICES - Public schools excepted by 49 CFR 107.606(a)		
8211	Elementary and Secondary Schools	$5.0
8221	Colleges, Universities, and Professional Schools	$5.0
8222	Junior Colleges and Technical Institutes	$5.0
Division K - NONCLASSIFIABLE ESTABLISHMENTS		
9999	Nonclassifiable Establishments	$5.0

* N.E.C., Not Elsewhere Classified

SCHN00246916

Hazardous Materials Emergency Preparedness (HMEP)

Grants Made for Use in Fiscal Year 2000

Alaska	$55,396	*0.7%*
Alabama	$158,656	*1.9%*
Arkansas	$98,074	*1.2%*
Arizona	$109,987	*1.3%*
California	$652,701	*7.7%*
Colorado	$112,131	*1.3%*
Connecticut	$101,084	*1.2%*
District of Columbia	$50,374	*0.6%*
Delaware	$60,418	*0.7%*
Florida	$291,039	*3.4%*
Georgia	$191,961	*2.3%*
Hawaii	$60,250	*0.7%*
Iowa	$140,917	*1.7%*
Idaho	$79,161	*0.9%*
Illinois	$425,763	*5.0%*
Indiana	$204,516	*2.4%*
Kansas	$157,486	*1.9%*
Kentucky	$121,334	*1.4%*
Louisiana	$139,745	*1.6%*
Massachusetts	$145,769	*1.7%*
Maryland	$126,690	*1.5%*
Maine	$72,468	*0.9%*
Michigan	$227,442	*2.7%*
Minnesota	$174,391	*2.0%*
Missouri	$181,584	*2.1%*
Mississippi	$119,496	*1.4%*
Montana	$79,161	*0.9%*
North Carolina	$203,843	*2.4%*
North Dakota	$104,099	*1.2%*
Nebraska	$124,179	*1.5%*
New Hampshire	$70,290	*0.8%*
New Jersey	$208,697	*2.5%*
New Mexico	$99,244	*1.2%*
Nevada	$78,995	*0.9%*
New York	$339,237	*4.0%*
Ohio	$355,639	*4.2%*
Oklahoma	$127,193	*1.5%*
Oregon	$123,679	*1.5%*
Pennsylvania	$282,670	*3.3%*
Rhode Island	$62,257	*0.7%*
South Carolina	$123,344	*1.4%*
South Dakota	$83,010	*1.0%*
Tennessee	$165,519	*1.9%*
Texas	$432,624	*5.1%*
Utah	$94,392	*1.1%*
Virginia	$163,008	*1.9%*
Vermont	$56,401	*0.7%*
Washington	$133,219	*1.6%*
Wisconsin	$174,554	*2.1%*
West Virginia	$96,567	*1.1%*
Wyoming	$67,112	*0.8%*
American Samoa	$44,182	*0.5%*
Guam	$45,186	*0.5%*
Northern Mariana Islands	$44,181	*0.5%*
Puerto Rico	$92,381	*1.1%*
US Virgin Islands	$44,686	*0.5%*
Cherokee Nation - OK	$9,480	*0.1%*
Ely Shoshone Tribe - NV	$16,975	*0.2%*
Menominee Indian Tribe - WI	$12,000	*0.1%*
Mississippi Band of Choctaw Indians - MS	$11,195	*0.1%*
Pyramid Lake Paiute Tribe - NV	$39,498	*0.5%*
Salish & Kootenai - MT	$20,000	*0.2%*
Shingle Springs Rancheria - CA	$5,375	*0.1%*
St. Regis Mohawk Tribe - NY	$18,926	*0.2%*
Grand Total	$8,511,831	*100%*

SCHN00246917

U.S. Department of Transportation
Research and Special Programs
Administration
Hazardous Materials Registration
Program, DHM-60
400 7th Street, S.W.
Washington, DC 20590

U.S. DOT Hazmat
Registration Enclosed
Materials Program
New Requirements for 2000-2001

Do You Offer or Transport HAZMAT in Commerce?

Then you may need to sign up with:

New Requirements for 2000-2001 Registration Year

2000-2001 Instructions

U.S. Department of Transportation
Research and Special Programs
Administration

SCHN00246918

SCHNITZER STEEL INDUSTRIES, INC.
PO BOX 10047
PORTLAND, OREGON 97296-0047

August 15, 2000

U.S. Department of Transportation
Hazardous Materials Registration
P.O. Box 740188
Atlanta, Georgia 30374-0188

To whom it may concern:

We have received your U.S. Department of Transportation Hazardous Materials Registration forms in the mail on several occasions. We believe Schnitzer Steel Industries, Inc. **is not** a Transporter of Hazardous Materials as defined by 40CFR 107.601-107.620 and as illustrated in your registration program packet of information (attached). We would very much appreciate being removed from your list of Hazardous Material Transporters. If you have any information that would indicate otherwise, please contact me on or before September 15, 2000 so we can properly address registration requirements. If you have comments you can reach me at (503) 286-6976. Written responses should be sent to the address listed above.

Sincerely,

Jim Jakubiak

Jim Jakubiak
Environmental Administrator

Attachment

Cc: US Department of Transportation, Research and Special Programs Administration

U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

JUL 31 2000

TO CARRIERS, SHIPPERS, AND OTHER OFFERORS OF HAZARDOUS MATERIALS

In May and June we mailed to your company brochures describing the U.S. Department of Transportation's (DOT) Hazardous Materials Registration Program. We sent those mailings to your company because it was identified as a carrier or shipper of hazardous materials on the Office of Motor Carrier Census form (Form MCS-150) when that form was filed or is included in our internal records of companies that offer or transport hazardous materials. We are again sending you this information to make sure that you understand that companies that engage in activities requiring registration with the DOT must file a registration statement and pay a fee.

Beginning with the 2000-2001 registration year, which began on July 1, 2000, each company that (1) offers a shipment of hazardous materials (including hazardous wastes) for transportation that by itself requires the **placarding** of the transport vehicle or (2) carries a hazardous material in a quantity that requires **placarding** of the transport vehicle must register. The exceptions to this requirement are discussed in the enclosed brochure on page 2 under the heading "Person."

This change to the regulations means that companies that previously were not required to register may now be subject to the registration requirement. If at any time between July 1, 2000, and June 30, 2001, your company either carries, ships, or otherwise offers for transportation a shipment that requires the placarding of the transport vehicle, rail car, unit load device, freight container, or bulk packaging, your company must register. See 49 CFR 172.500-560 for the Department's placarding requirements.

If your company is required to register, you may mail the form supplied in the enclosed brochure, with a check or credit card information, to the address printed on the back of the form. Or you may now register on the Internet at

http://hazmat.dot.gov/register.htm

If you are not engaging in any activity that requires registration, or if you have already registered for the 2000-2001 registration year, no further action is necessary. If you have questions about the registration program, please call us at 202-366-4109. If you have questions about the hazardous materials regulations (including the placarding requirements), please call the Hazardous Materials Information Center at 1-800-467-4922.

U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh Street S.W.
Washington, D.C. 20590

HAZARDOUS MATERIALS REGISTRATION PROGRAM

This packet contains information outlining registration requirements applicable to persons who offer or transport hazardous materials in commerce. If you received this in the mail, we have sent it to you because your company is currently registered in the Hazardous Materials Registration Program or appears on one or more of several lists of companies as an offeror or transporter of hazardous materials (including hazardous wastes). These lists were collected primarily from offices within the U.S. Department of Transportation or the U.S. Environmental Protection Agency.

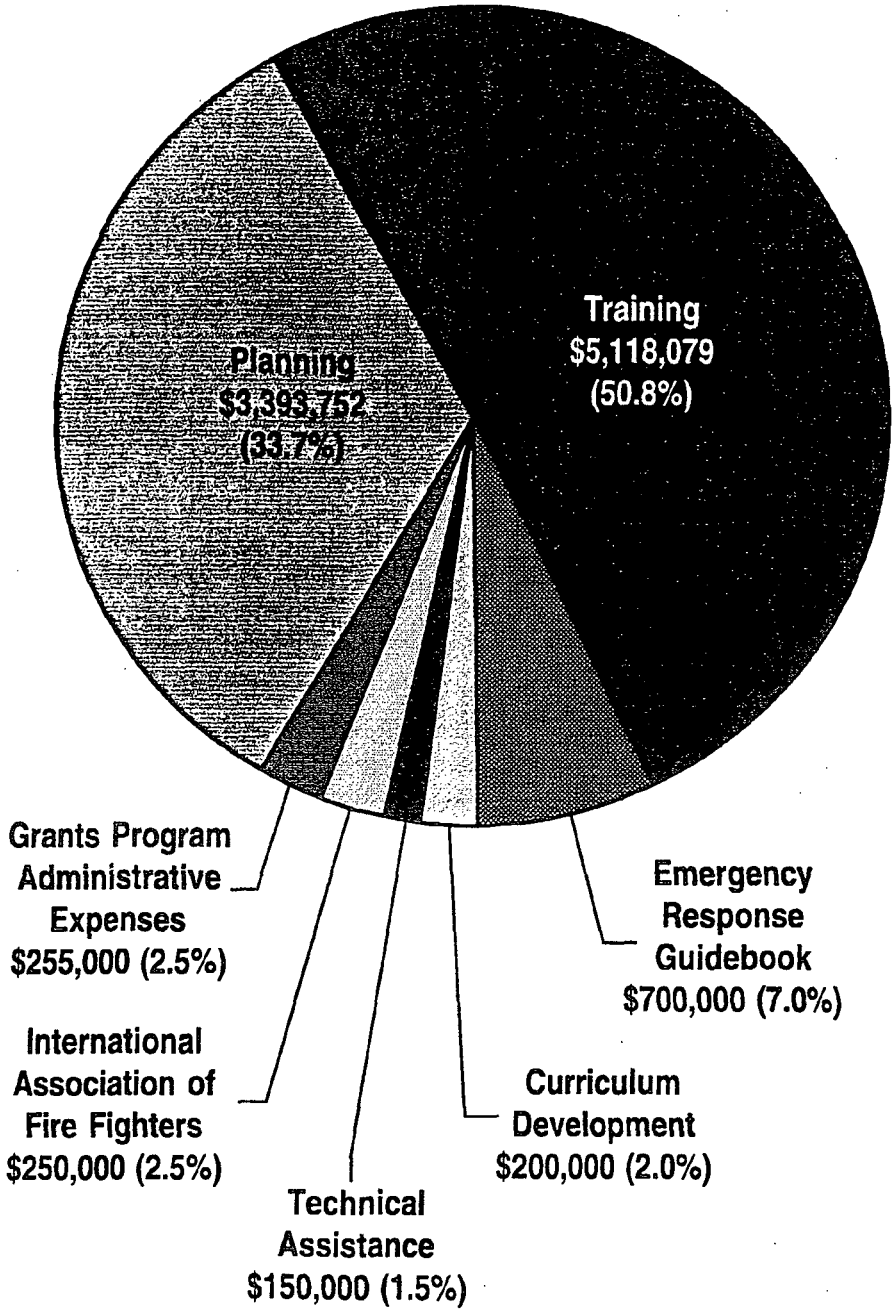
The accompanying material includes information on who is required to register with the U.S. Department of Transportation's Hazardous Materials Registration Program. **The registration requirements have been significantly revised for the registration year that begins on July 1, 2000, and persons who formerly were not required to register may now be required to do so.** All activities that formerly required registration continue in effect. While inclusion in any of our source lists is not an absolute indication that you are required to register, it does indicate that you may be subject to the registration requirements. You should read the explanation of who is required to register on page 2 of the instructions brochure to determine whether your company must comply.

It is important to understand that the Hazardous Materials Registration requirements apply to a "person," which includes each separate corporation, partnership, or association. Registration is not required for each vehicle that you operate or for each facility or terminal you own or operate.

We have tried to remove duplicate address records for single companies from the mailing. However, when working from lists from different sources, it is difficult to eliminate multiple entries. Further, some of our sources are site-specific, and determining which site address represents the principal place of business of each "person" or company is not always possible. Consequently, this letter may have been sent to more than one location for a single company or "person." We regret any inconvenience this may cause.

Where Do Your Registration Fees Go?

Hazardous Materials Emergency Preparedness (HMEP)
Grants Program
Fiscal Year 1999



REGISTERING AS AN OFFEROR OR TRANSPORTER OF HAZARDOUS MATERIALS

Must *YOU* Register?

U.S. DEPARTMENT OF TRANSPORTATION

Hazardous Materials Registration Program

Instructions & Form DOT F 5800.2
For Registration Year 2000 - 2001

Revised Requirements Effective July 1, 2000

IMPORTANT CHANGES

The following changes apply for the 2000-2001 Registration Year, which begins on July 1, 2000:

- Registration is now required for each person that offers or transports **any shipment of hazardous materials that requires placarding** (with an exception for farmers offering or transporting hazardous materials in direct support of their farming activities). Registration is still required by each person (including a farmer) engaged in any of the five categories of activities that previously triggered the registration requirement. See page 2 for an explanation of the term "person," the activities that require registration, and the exceptions to the requirement.
- The annual registration fee is $300 for each person meeting the Small Business Administration's criteria for a small business and $2,000 for each person that does not meet those criteria. See page 4 for information on how to determine if you are a small business.
- You may now register for one, two, or three registration years by completing a single registration statement and paying the appropriate fees. The fees listed include a $25 administrative fee for each filing. By submitting a form and payment for two or three years, you save on the administrative portion of the fee. A single Certificate of Registration with a Registration Number good for one, two, or three years will be issued for each statement.

You may register by using one of the following methods:

- Complete form DOT F 5800.2 (revised 3/00) and mail it with payment of the appropriate fee to the address given on the printed form.
- Register by telephone through the expedited procedures described on pages 7 - 8 of this brochure.
- Register through the Internet as explained on page 8 of this brochure.

INTRODUCTION: Background and Uses of the Fee

Under the federal hazardous material transportation law (49 U.S.C. 5101 *et seq.*), certain offerors and transporters of hazardous materials, including hazardous waste, are required to file a registration statement with the U.S. Department of Transportation and to pay an annual fee. This program began in 1992 and is administered by the Associate Administrator for Hazardous Materials Safety, Research and Special Programs Administration (RSPA). The registration regulations are found at 49 CFR 107.601-107.620.

The fee provides funds for grants distributed to states and Indian tribes for hazardous materials emergency response planning and training through the Hazardous Materials Emergency Preparedness Grants Program. For use in FY 2000, 50 states, the District of Columbia, five territories, and eight Indian tribes received grant awards totaling $8.51 million. These grants support planning and training of emergency personnel to respond to incidents involving hazardous materials. Since 1993 the grants have been used to train, in part, approximately 120,000 emergency responders each year. In addition, $750,000 in grants have been made to the International Association of Fire Fighters to support their hazardous materials instructor train-the-trainer program. The fees are also used to publish the *Emergency Response Guidebook*. **Your fee is helping communities prepare for a spill, accident or other hazardous materials emergency that may occur.**

U.S. Department of Transportation
Research and Special Programs Administration

SCHN00246923

WHO MUST REGISTER

If you are a person* as defined by the federal hazardous material transportation law and engage in any of the activities requiring registration, you must register. See the discussion of person below for exceptions to the requirement.

*Underlined words are defined on pages 2 - 4.

Activities Requiring Registration:

A person who, between July 1 of a year and June 30 of the following year, engages in any of the following activities must register with RSPA for that twelve- month period.

1. Offers or transports in commerce a quantity of hazardous material that requires placarding. This category of activities requiring registration was added beginning with the 2000-2001 registration year. On the Registration Statement, this activity is identified as Category F. The offering and transporting of hazardous materials by farmers in direct support of their farming operations are excepted from this category of activities requiring registration. See the section "Requirements for Farmers" on page 3.
2. Offers or transports in commerce any of the following (Note: the letters identifying each of the following sections represents the "Category" of activity used on the Registration Statement):
   - A. A highway route controlled quantity of a Class 7 (radioactive) material, as defined in 49 CFR 173.403.
   - B. More than 25 kilograms (55 pounds) of a Division 1.1, 1.2, or 1.3 (explosive) material (see 49 CFR 173.50) in a motor vehicle, rail car, or freight container.
   - C. More than one liter (1.06 quarts) per package of a "material extremely toxic by inhalation" (that is, a "material poisonous by inhalation," as defined in 49 CFR 171.8, that meets the criteria for "hazard zone A" as specified in 49 CFR 173.116(a) for gases or 173.133(a) for liquids).
   - D. A hazardous material (including hazardous wastes) in a bulk packaging (see 49 CFR 171.8) having a capacity equal to or greater than 13,248 liters (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids (see definition of "Bulk Packaging" for further clarification). Please note that under this provision persons who offer or transport hazardous materials that do not require placarding (that is, Class 9 materials) in a bulk packaging with a capacity greater than 3,500 gallons or 468 cubic feet, must register.
   - E. A shipment in other than a bulk packaging of 2,268 kilograms (5,000 pounds) gross weight or more of one class of hazardous materials (including hazardous wastes) for which placarding of a vehicle, rail car, or freight container is required for that class (see definition of "Bulk Packaging" for further clarification).

Person:

A person is defined by federal hazardous material transportation law as including an individual, firm, copartnership, corporation, company, association, joint-stock association, including any trustee, receiver, assignee, or similar representative thereof, or government, Indian tribe, or agency or instrumentality of any government or Indian tribe when it offers hazardous materials for transportation in commerce or transports hazardous materials to further a commercial enterprise. However, the following are specifically excepted by statute or regulation from the registration requirements:

A. Agencies of the federal government.

B. Agencies of states.

C. Agencies of political subdivisions of states.

D. Employees of those agencies listed in [A], [B], or [C] with respect to their official duties.

E. Hazmat employees, including the owner-operator of a motor vehicle that transports hazardous materials in commerce if that vehicle, at the time of those activities, is leased to a registered motor carrier under a 30-day or longer lease as prescribed in 49 CFR Part 376 or an equivalent contractual relationship.

F. Persons domiciled outside the United States whose only activity involving the transportation of hazardous materials within the United States is to offer hazardous materials for transportation in commerce from locations outside the United States, if the country in which they are domiciled does not impose registration or a fee upon U.S. companies for offering hazardous materials into that country. However, persons domiciled outside the United States who transport the types and quantities of hazardous materials that require registration within the United States must register.

G. Farmers, as defined in 49 CFR 171.8, who offer or transport only hazardous materials that are used in direct support of their farming operations **and** who are not engaged in activities included in 49 CFR 107.601(a)(1) through (a)(5), that is, Categories A through E described in "Activities Requiring Registration" above. See "Requirements for Farmers" on page 3.

Clarifications:

The registration requirement applies to all persons who (1) engage in interstate, intrastate, or foreign commerce; (2) engage in any of the activities discussed in "Activities Requiring Registration" above; and (3) are not specifically excepted from the requirement.

Each person who acts as an intermediary in the transportation of hazardous materials, such as a freight-forwarder or agent, is subject to the registration requirements if that person performs or contracts to perform any of the functions of an offeror of hazardous materials.

Each U.S. company engaged in a specified hazardous materials activity that is (1) incorporated separately from a parent company, (2) under the majority stock ownership of another company, or (3) a wholly-owned or controlled-subsidiary of another company, is required to register even when the parent company is also subject to registration.

You must also register if you engage in any of the activities discussed in "Activities Requiring Registration" above, and are:

1. A merchant vessel carrier transporting, transiting, or transhipping hazardous materials within 12 miles of the U.S. coast;
2. A federal, state, or local government contractor.

SCHN00246924

Requirements for Farmers:

1. If you are a farmer who offers or transports only hazardous materials that (a) are to be used in direct support of your farming activities **and** (b) are not included in section 2 of "Activities Requiring Registration" above (that is, Categories A through E on the Registration Statement), you are not required to register.
2. If you are a farmer who offers or transports hazardous materials that require placarding that are **not** in direct support of your farming operation, you must register and pay the appropriate registration fee. For example, a farmer who offers or transports home heating fuel for commercial purposes in quantities requiring placarding must register.
3. If you are a farmer who offers or transports for any purpose any of the hazardous materials included in section 2 of "Activities Requiring Registration" above (Categories A through E on the Registration Statement), you must register and pay the appropriate registration fee. For example, if you transport 55 lbs or more of a Division 1.1 explosive, even if the explosive is to be used in direct support of your farming operations, you must register.

DEFINITIONS

Bulk Packaging:

A bulk packaging is a packaging, other than a vessel or a barge, with (1) a maximum capacity greater than 450 liters (119 gallons) as a receptacle for a liquid; (2) a maximum net mass greater than 400 kilograms (882 pounds) and a maximum capacity greater than 450 liters (119 gallons) as a receptacle for a solid; or (3) a water capacity greater than 454 kilograms (1000 pounds) as a receptacle for a gas (see 49 CFR 171.8).

The extension of the registration requirement to all placarded shipments will in most instances over-ride categories D and E, which define activities that require registration involving (1) any hazardous material in a bulk packaging with a capacity equal to or greater than 13,248 liters (3,500 gallons) for liquids and gases or more than 13.24 cubic meters (468 cubic feet) for solids (category D), or (2) any shipment in other than a bulk packaging of 2,268 kilograms (5,000 pounds) gross weight or more of a class of hazardous materials for which placarding of a vehicle, rail car, or freight container is required (category E). Hazardous materials (particularly Class 9 hazardous wastes) that do **not** require placarding but **are** placed in bulk packagings with capacities greater than 3,500 gallons or 468 cubic feet require registration under category D. However, shipments of hazardous materials that do **not** require placarding (for example, Class 9 materials), placed in bulk packagings with capacities **less than** 3,500 gallons or 468 cubic feet, do **not** require registration.

It is still important to note that the use of bulk packagings with capacities equal to or greater than 13,248 liters (3,500 gallons) or more than 13.24 cubic meters (468 cubic feet) requires registration no matter how small the quantity of hazardous materials offered or transported. For example, persons who have hazardous waste picked up in tank trucks with such capacities, and persons who return unpurged tank trucks or rail tank cars from which they have unloaded hazardous materials so that the tanks still contain residues of hazardous materials when returned, must register under the provisions of Category D.

Calendar Year:

Although the registration year extends from July 1 of a year through June 30 of the following year, a calendar year is used to report activity in item 7 of the registration statement, "Prior-Year Survey Information." This calendar year is the twelve-month period (January 1 through December 31) immediately preceding the beginning date of the registration year (or years) for which you are filing the registration statement. You are asked to supply information on your activities in calendar year 1999 on the statement submitted for 2000-2001 (or 2000-2002, or 2000-2003). The use of the preceding calendar year in reporting activity provides a definite and verifiable (rather than speculative) basis for this section of the form.

Employees, Number of:

See "Small Business" below.

Farmer:

The term "farmer" means a person engaged in the production or raising of crops, poultry, or livestock (49 CFR 171.8).

Gross Annual Receipts:

See "Small Business" below.

Highway Route Controlled Quantity:

The criteria for determining whether a shipment of radioactive material is a "highway route controlled quantity" are found in 49 CFR 173.403, which further references 49 CFR 173.435. Please note that any shipment of a "highway route controlled quantity" of a radioactive material, whether by highway, rail, air, or water, subjects the offeror and carrier to the registration requirement.

If you think you are an offeror or carrier of highway route controlled quantities, please review the defining criteria carefully. Shipments of highway route controlled quantities must be specifically identified as such by the offeror on the shipping papers (see 49 CFR 172.203(d)(4)).

Modes:

The four modes of transportation that are covered under the Hazardous Materials Regulations, including the registration requirement, are highway, rail, air, and water. For purposes of registration, highway transportation includes all interstate, intrastate, and foreign shipments that meet the registration criteria and are not specifically excepted by regulation. Water transportation does not include hazardous materials loaded or carried on board a vessel without benefit of containers or labels. This type of shipment, for which the vessel becomes the container, such as LNG or oil tanker vessels, falls under the authority of the U.S. Coast Guard. See the delegation of authority at 49 CFR 1.46(t).

Offeror:

An offeror is a person who ships hazardous materials in commerce, or a person who acts as an intermediary in the transportation of hazardous materials (such as a freight-forwarder or agent) if the intermediary performs any of the functions of an offeror of hazardous materials. Functions of an offeror, besides shipping, include, but are not limited to: selecting the packaging for a regulated hazardous material, physically transfering a hazardous material to a carrier, determining the hazard class of a hazardous material, preparing shipping papers, reviewing shipping papers to verify compliance with the hazardous materials regulations or their international

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equivalents, signing hazardous materials certifications on shipping papers, placing hazardous materials markings or placards on vehicles or packages, and providing placards to a carrier.

A formal interpretation of the terms "offeror" and "transporter" as related to the registration requirements was published in the Federal Register on October 28, 1992, pages 48739 - 48741.

Further clarification of the term "offeror" was supplied in the Final Rule published in the Federal Register on February 14, 2000, page 7304. In item 7 of the registration statement, you are asked to indicate whether you operated as a "Shipper," "Carrier," or "Other" during the calendar year preceding the beginning of the registration year. Persons who act as intermediaries should mark "Other" (marking "Shipper" or "Carrier" as well if appropriate).

Shipment:

The term "shipment" as used in the registration regulations means the offering or loading of hazardous material at one loading facility using one transport vehicle, or the transport of that transport vehicle (see 49 CFR 107.601(c)).

Small Business:

A company is a "small business" if it meets the criterion established by the U.S. Small Business Administration (SBA) in 13 CFR 121 for the Standard Industrial Classification (SIC) code that describes the primary commercial activity of the company. A complete list of SBA criteria by SIC code can be found at the SBA Internet site at http://www. sbaonline.sba.gov/regulations/siccodes/. Or call the SBA Office of Advocacy at 202-205-6533 for assistance. A link to the SBA site is provided at the Registration Internet page. A list of the SIC codes and size criteria for some common hazardous materials industry groups is given on page 12. With a few exceptions, the criterion is either the number of employees or the gross annual receipts. The number of employees is defined by SBA as being the average number of employees (including all individuals employed on a full-time, part-time, temporary, or other basis) employed during the pay periods in the preceding twelve months. See 13 CFR 121.106 for the applicable SBA definition. "Gross annual receipts" is defined by SBA at 13 CFR 121.104. "Receipts" means "total income" (or in the case of a sole proprietorship, "gross income") plus the "cost of goods sold" as these terms are defined or reported on Internal Revenue Service (IRS) federal tax returns. The term, however, excludes net capital gains or losses, taxes collected for and remitted to a taxing authority if included in gross or total income, and proceeds from the transactions between a concern and its domestic or foreign affiliates (if also excluded from gross or total income on a consolidated return filed with the IRS). If your company has been in business for three or more years, the "annual receipts" is the receipts over its last three completed fiscal years divided by three. For companies in existence less than three years, the "annual receipts" is calculated by taking the receipts for the period the company has been in business divided by the number of weeks in business, multiplied by 52. Whether annual receipts or number of employees is the criterion established for your SIC code, you should look at the receipts or number of employees for the "person" required to register. The "person" required to register may be smaller than the "entity" (including affiliates) the SBA considers in applying its criteria for its internal purposes.

Standard Industrial Classification (SIC):

The SBA criteria for "small business" are established for each standard industrial classification (SIC) code. If a company engages in more than one business activity (industry), the SIC code for the primary industry is the one that should be used. To determine a company's primary industry, the SBA considers the distribution of receipts, employees and costs of doing business among the different industries in which business operations occurred for the most recently completed fiscal year. Companies unsure of their SIC codes may refer to the U.S. Occupational Safety and Health Administration's search engine for detailed descriptions of the businesses included in each classification. The search engine is at http://www.osha.gov/oshstats/sicser.html. A link to this site is provided at the Registration Internet page.

Transportation:

Transportation means the movement of property and any loading, unloading, or storage incidental to the movement (49 U.S.C. 5102 (12)).

REGISTRATION DEADLINE

The completed 2000-2001 registration statement and payment must be submitted before July 1, 2000, or before engaging in any of the activities requiring registration, whichever is later. We suggest that you submit your registration at least four weeks in advance of the date you will need the registration certificate in order to allow sufficient time for the registration to be processed and the certificate produced and mailed to you. If you need to obtain a registration number immediately, see the instructions for "Expedited Registration" on pages 7-8 or for "Registering through the Internet" on page 8.

RECORDKEEPING REQUIREMENTS

Copies of the registration statement and the certificate of registration must be kept for three years at your principal place of business and must be available for inspection. Motor carriers and vessel operators must also have on board a copy of the current certificate of registration, or another document bearing the current year's registration number identified as the "U.S. DOT Hazmat Reg. No." Every truck or truck tractor or vessel you use for the transportation of hazardous materials that meets the registration criteria must have this proof of registration on board.

STATE REGISTRATIONS

Some states have hazardous materials registration or permitting programs that may also apply to you. Registration with RSPA does not replace state requirements.

USE THE PROPER REGISTRATION STATEMENT

You must use the Registration Statement, Form DOT F 5800.2 (Revised 3/00), supplied in this brochure, to register after May 1, 2000, no matter which year or years you are registering for. Statements submitted on versions of the form dated earlier than 3/00 will be returned unprocessed and will therefore delay your registration.

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PENALTIES FOR FAILURE TO REGISTER

The requirement to register with DOT is based on a federal law. The enforcement of this requirement is conducted cooperatively by federal, state, and local agencies. Federal, state, or local officials may impose penalties for failing to register or failing to meet the recordkeeping requirements.

REGISTERING AS A NON-RESIDENT

If you are not a resident of the United States, you must designate a permanent U.S. resident to serve as "agent for service of process" in accordance with 49 CFR 107.7. The name and address of your agent must be attached to the statement.

SOURCES OF INFORMATION

For Copies of this Brochure and Registration Forms:

- Download copies from the RSPA Registration Internet Home Page at http://hazmat.dot.gov/register.htm.
- Dial RSPA's automated Fax-on-Demand service at 1-800-467-4922. Press "2" and follow the instructions to request document number 700.
- E-mail your request to REGISTER@rspa.dot.gov.
- Call 617-494-2545 or 202-366-4109.

For Questions on the Registration Program Requirements:

- Call the Registration Program office at 202-366-4109.
- E-mail questions to REGISTER@rspa.dot.gov.

For Questions About the Hazardous Materials Regulations:

- Call the Hazardous Materials Information Center at 1-800-467-4922.

For Questions About the SBA Size Criteria:

- See the complete listing of SIC codes and size criteria at http://www.sbaonline.sba.gov/regulations/siccodes/.
- Call the SBA Office of Advocacy at 202-205-6533.

For Information on the HMEP Grants Program

- Visit the HMEP Grants Internet site at http://hazmat.dot.gov/hmep.htm.
- Call the Grants Program office at 202-366-0001.

For the Status of your Registration Submission:

- Call 617-494-2545.

For Expedited Registration:

- Call 1-800-942-6990.

Registering through the Internet:

- Register through the Internet at http://hazmat.dot.gov/register.htm as explained on page 8 of this brochure.

For Copies of the Hazardous Materials Program Regulations:

- Contact the Superintendent of Documents, Government Printing Office, Washington, DC 20402; telephone 202-512-1800. Ask for Title 49 of the Code of Federal Regulations, Parts 100 to 185.
- Access the Code of Federal Regulations through the Internet at http://www.access.gpo.gov/nara/cfr or http://hazmat.dot.gov/rules.htm.

To Obtain a U.S. DOT ID Number:

- Call the Federal Motor Carrier Safety Administration's Office of Motor Carriers Information Line at 1-800-832-5660.

IF YOU HAVE FAILED TO REGISTER FOR PAST YEARS . . .

If you engaged in any of the hazardous materials activities described in 49 CFR 107.601(a)(1) through (a)(5), that is, those listed on the statement as categories A through E, in registration years before 2000-2001, but did not register, you must do so now. There have been eight prior registration years:

1992-93 (September 16, 1992, to June 30, 1993);
1993-94 (July 1, 1993, to June 30, 1994);
1994-95 (July 1, 1994, to June 30, 1995);
1995-96 (July 1, 1995, to June 30, 1996);
1996-97 (July 1, 1996, to June 30, 1997);
1997-98 (July 1, 1997, to June 30, 1998);
1998-99 (July 1, 1998, to June 30, 1999); and
1999-2000 (July 1, 1999, to June 30, 2000).

You must file a registration statement and pay $300 for each year you did not register. For these prior years the fee amount is not determined by the SBA size criteria. You may copy and use the form supplied in this booklet to register for each previous year.

Complete the "Activities" and "States" sections of item 7 of the registration statement to reflect the type of activities you conducted and the states in which you conducted them during the calendar year preceding the beginning of the registration year for which the statement is being filed.

For example, if you are filing for the 1999-2000 registration year, report the activities you engaged in, and the states in which you offered or transported hazardous materials, between January 1 and December 31, 1998.

For Information about Hazardous Materials Safety:

- The Office of Hazardous Materials Safety's Internet homepage contains extensive information on the transportation of hazardous materials. Please visit our site at http://hazmat.dot.gov.

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REGISTRATION INSTRUCTIONS FOR OFFERORS AND TRANSPORTERS OF HAZMAT

Beginning with the 2000-2001 registration year, you may register for one, two, or three years through a single registration statement and the payment of the appropriate fees. You may register for the 2000-2001 registration year (July 1, 2000, through June 30, 2001), OR for the 2000-2001 and 2001-2002 registration years (July 1, 2000, through June 30, 2002), OR for the 2000-2001, 2001-2002, and the 2002-2003 registration years (July 1, 2000, through June 30, 2003). You may complete a registration statement (DOT Form F 5800.2 Revised 03/00), and send the statement with payment to the U.S. Department of Transportation at the address shown on the back of the form, or you may register through the Internet by following the directions on page 8.

Register before July 1, 2000, or before engaging in any of the activities requiring registration,* whichever is later. You must have the DOT certificate and registration number before you offer or transport hazardous materials. Allow four weeks after mailing your completed registration statement and payment to receive your certificate. You will receive a new registration number for each properly completed registration statement you submit.

The instructions for completing the registration statement form begin on this page and continue on page 7. You may find it useful to read through the instructions and the statement before completing it. These instructions may be useful in submitting your registration through the Internet, though the sequence of the required information is altered on the Internet registration page. Please fill in the top block before starting item 1.

*Underlined words are defined on pages 2 - 4.

TOP BLOCK

- Fill in the appropriate registration year or years. You may enter "2000-2001" (for one year), "2000-2002" (for two years) or "2000-2003" (for three years).
- Check the kind of registration you are making:

Initial Registration means you are registering for the first time. Since you have no registration number yet, leave the space for "Current Registration #" blank.

Renewal of Registration means you have registered in one or more previous years; please enter the most recently issued registration number you have been given as the "Current Registration #."

Amendment to Registration means you are updating information currently on file (which you must do if your name or principal place of business changes during the year). If you need instructions only for making this kind of change, skip to the box below.

Expedited Follow-up means you already made an expedited registration by phone and are providing follow-up data to that transaction. Enter the temporary registration number you received over the phone as the "Current Registration #." **If you check Expedited Follow-up, please turn to page 8 for special instructions on completing this form.**

IDENTIFYING INFORMATION

1 and 2. Enter your business name and address. This is the address to which the certificate of registration and any necessary correspondence will be mailed. If we have provided you with a pre-printed label and no corrections are necessary, you may use that label to supply this information.

3. If you have any of these ID numbers, enter them. Carriers who do not currently have an ID number and shippers may leave this space blank. (To verify your U.S. DOT ID number, call the Office of Motor Carriers Information Line at 1-800-832-5660.)

4. Check all the ways you moved hazardous materials during the calendar year ending last December. If you are a carrier, mark only the mode(s) you used to transport hazardous materials. If you are a shipper or other offeror, check all modes used to transport shipments offered by your company.

5. Enter the four-digit Standard Industrial Classification (SIC) code that best describes the primary business activity of your company. See the definition on page 4 for further help.

   Indicate whether your company meets the U.S. Small Business Administration's criteria for a small business. See the definition and the resources for help given on page 4. Apply the specified criterion (either the number of employees or the gross annual receipts) to the registering person.

REGISTRATION FEES AND PAYMENT INFORMATION

6. If your company meets the SBA criteria for a small business, the fee is $300 for one year, $575 for two years, or $850 for three years.

   If your company does not meet the SBA criteria for a small business, the fee is $2,000 for one year, $3,975 for two years, or $5,950 for three years.

   If your company is not a small business and is submitting an Expedited Follow-up, the remaining fee is $1,700.

AMENDING YOUR REGISTRATION

You must amend your registration statement within 30 days if there is a change in your company's name or principal place of business. You may submit an amendment through the registration Internet page at:

http://hazmat.dot.gov/register.htm

or by following these directions:

Check "Amendment to Registration" on the top block of the registration statement, enter the "Current Registration #," record the new name or address in items 1 and 2, and complete and sign item 8, CERTIFICATION OF INFORMATION. You need not fill in any other sections.

Attach a copy of the original certificate of registration to the amended form. Send the amendment to the Atlanta, Georgia, address printed on the form.

There is no additional fee for filing an amendment whether done by mail or through the Internet.

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If you are registering for a year prior to 2000-2001, the fee is $300 whether or not your company meets the SBA's criteria for a small business.

Either:

a. Enclose a check or money order, identified as Hazmat Registration Fee, and drawn on a U.S. bank in U.S. funds, payable to "U.S. Department of Transportation" OR

b. Pay by VISA, MasterCard, American Express, or Discover by completing the credit card payment block on the form.

Registration and full fee payment are required of any person engaging in any of the specified activities at any time during the registration year. The fee is not prorated for registrations submitted after July 1.

HAZARDOUS MATERIALS ACTIVITIES

7. Use this part of the form to record your hazardous materials activities during the calendar year ending last December 31. Even if you engaged in none of the hazardous materials activities described here last year, but you intend to do so this year, you must register and pay the appropriate fee (mark category G).

   Item 7 defines six categories of materials subject to registration. Mark each category that your company engaged in during the last completed calendar year. Shipments of materials included in Categories A, B, C, D, or E should not also be included in Category F, even though in most instances such shipments require placarding. For instance, if your only hazardous materials activity is carrying more than 55 lbs. of Division 1.1 explosives, you should mark only Category B - not B and F. If, however, your only activity is shipping hazardous materials in quantities that require placarding that are not included in Categories A through E, mark Category F. If you carry both shipments of more than 55 lbs. of Division 1.1 explosives and shipments of hazardous materials not included in Categories A through E, not in bulk packagings, of more than 1,000 lbs. but less than 5,000 lbs., you would mark both Categories B and F. If you are registering for a year prior to 2000-2001, you should not mark Category F even if you engaged in that activity during the applicable preceding calendar year. Activity in Category F requires registration only beginning in Registration Year 2000-2001.

   For each of the categories A, B, C, D, E, or F, that you marked, also tell us - for each one:

   (1) Activities: Whether you handled the hazardous materials as a shipper, carrier, or "other." Check as many as apply. "Other" refers to activities other than those of the "shipper" or "carrier" in which any of the functions of an offeror or carrier are performed. See the definition of "Offeror" on pages 3 - 4.

   (2) States: Which states you operated in with respect to this hazardous material. Circle the abbreviation for each state or territory in which you did business in hazardous materials. If you checked "carrier," circle all states in which you operated as a carrier of that category of hazardous material. If you checked "shipper" or "other," circle only those states from which you offered hazardous materials - you need not indicate states to which or through which the materials were transported. Registrants operating in all of the "lower 48" states may circle "48 Contiguous States." (This excludes Alaska, Hawaii, the District of Columbia, and our five territories, which must be circled individually, if appropriate.) A list of the states and territories and their abbreviations is provided on page 11.

   Remember, if you did not engage last year in any of the activities described in categories A through F, check category G.

CERTIFICATION OF INFORMATION

8. Your signature in item 8 certifies that the information on this form is true, accurate, and complete. BE ADVISED that false statements may violate the law (18 U.S.C. 1001). Complete this part with the signer's name, title, and telephone number and the date the certification is signed. The individual who signs this certification should be an appropriate representative of the registrant. Correspondence regarding registration, including the certificate of registration and next year's form and instructions, will be addressed to this individual.

MAILING INSTRUCTIONS

Mail your completed registration form (one copy) and payment together to this address in Atlanta:

U.S. Department of Transportation
Hazardous Materials Registration
P.O. Box 740188
Atlanta, GA 30374-0188

Do not send them to Washington, D.C. Be sure to mail form and payment **together.**

Be careful to use a mail service that delivers to P.O. Box addresses. (The Atlanta address is a post office box and many services cannot deliver to P.O. Boxes.)

Allow four weeks to receive your certificate of registration.

EXPEDITED REGISTRATION

If you need to register more quickly than the normal procedures provide, you may do so by telephone with credit card payment of an initial $350 fee, which includes an additional $50 expedited registration fee. For registrants that meet the SBA criteria for a small business, this $350 fee will be accepted as full payment of a single-year registration. For registrants that do not meet the SBA criteria for a small business, payment of an additional $1,700 must be made as part of the follow-up procedures (for a full payment of $2,050, which includes a $50 expedited registration fee). You may register only for a single year through the expedited procedures. You will be provided with a temporary registration number, which can be used for 45 days to prove compliance with the registration requirement. To obtain a registration number promptly, you may also register over the Internet (see page 8). No additional processing fee is required for registration over the Internet.

To register by telephone, please do the following:

1. Call (800) 942-6990 or (617) 494-2545 for service 24 hours a day, 7 days a week. Be ready to provide your company name, the mailing address of the principal place of business, and valid VISA, Mastercard, American Express, or Discover information. Your credit card account will be billed for $350 and payment will be confirmed while you are on the phone.

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2. A DOT registration specialist will provide a temporary registration number over the phone, which is good for proving compliance for 45 days from the date of your call. DOT will mail a temporary registration letter that serves as proof of payment of the fee, along with a copy of the registration statement for you to complete. You must complete the statement and return it to the address given in the letter within 10 days of receiving the registration package. Follow the special instructions for "Expedited Follow-Up" below and given in the letter. If your company meets the SBA criteria for a small business, do not resubmit credit card information or send another payment. If your company does not meet the SBA criteria for a small business, you must either submit credit card information or enclose a check or money order for $1,700 to complete the payment of the appropriate fee.
3. A certificate of registration with the current registration number will be sent to you. Use this number to replace the temporary number given to you over the phone.

Because the expedited procedures allow only single-year registrations, and involve the later payment of the remaining $1,700 fee if your company does not meet the SBA criteria for a small business, we suggest that registration through the Internet may be a more convenient means of obtaining a registration number immediately.

REGISTERING THROUGH THE INTERNET

You may register over the Internet at http://hazmat.dot.gov/register.htm. Follow the link to Registering Through the Internet, and read the instructions about using the hazardous materials e-commerce services. Your browser must support 128-bit encryption to complete payment transactions over the Internet. A means to check your current browser is provided for your convenience. If you need to update your browser to one that supports 128-bit encryption, links to sites from which one can be downloaded are provided on that page. Once you have verified that your browser will allow you to complete the transaction, proceed to the hazardous materials e-commerce page and select "Registration Application." On the Internet registration page, if you have previously registered, you can search for your company's existing registration records by a previous registration number or the company name, or from a list of companies with the zip code in which your principal place of business is located. Searches by previous registration numbers are recommended. Having located your company record, you will have an opportunity to update any company information, and to complete the statement. If you are a first-time registrant, you must fill in the company information on the Registration Statement. You can register for one, two, or three years, beginning with the 2000-2001 registration year. You may make the appropriate payment by Visa, MasterCard, American Express, or Discover. The completed Statement may be printed out to be retained at your principal place of business to fulfill part of the recordkeeping requirements. At the end of the process, after the payment has been verified, you will be able to print your Certificate of Registration with the new registration number. We will mail you a copy of the Certificate to make sure that you have a copy, but we recommend that you print it out from the Internet page as well. There is no additional charge for registering over the Internet, and we recommend this process, *especially if you are in immediate need of a* registration number. The instructions and discussions in this brochure apply to registering through the Internet, though the order in which some of the information is collected may vary.

You may also submit an amendment to your current registration through the Internet. By searching for your company's records you may also use this service to check on your company's history of registrations and check for current and past registration numbers. There are no charges for looking up your company's records or for submitting an amendment.

Expedited Follow-Up

SPECIAL INSTRUCTIONS FOR COMPLETING EXPEDITED REGISTRATION

[For Those Who Have Made Expedited Registration By Phone And Have Paid The $350 Initial Expedited Registration Fee]

FOLLOW THESE INSTRUCTIONS CAREFULLY TO AVOID DELAY

1. Check "Expedited Follow-up" in the top block and enter your temporary registration number in the space for "Current Registration #."
2. Complete items 1 through 8. In item 6 enter "0" for the "Total Amount Enclosed" if your company meets the SBA criteria for a small business, or "$1,700" if your company does not meet the SBA criteria for a small business. If the "Total Amount Enclosed" is $0, do not resubmit credit card information.
3. Send the completed statement and any necessary payment to DOT at the address in Cambridge, MA, given in the temporary registration letter.
4. Include a copy of the temporary registration letter with this submission as proof of payment of the initial $350 fee.

DOT will mail a certificate of registration with your current registration number for the year as confirmation that your registration process is complete. Use this number to replace the temporary number for all subsequent purposes.

You must respond within 10 days of receipt of the temporary registration letter.

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Exempted from Paperwork Reduction Act by 49 U.S.C. 5108(i)

U. S. DEPARTMENT OF TRANSPORTATION
HAZARDOUS MATERIALS REGISTRATION STATEMENT
REGISTRATION YEAR 20____ - 20____

(Please Type or Print all Responses)

Initial Registration ____ Renewal of Registration ____ Amendment to Registration ____ Expedited Follow-up ____

Current Registration # _ _ _ _ _ _ _ _ _ _ _ _ _ _

1. **Registrant** _____
(Company Name)

(Place pre-printed label here if provided and if name and address are correct. Otherwise, provide correct information.)

2. **Mailing Address of Principal Place of Business**

Street or P.O. Box _____ City _____

County _____ State _ _ Zip Code _ _ _ _ _ - _ _ _ _ Country _____

3. **Carrier's US DOT ID Number, ICC Number, or Reporting Railroad Alphabetic Code (if applicable)**

US DOT ID #_____ ICC # _____ Railroad Alphabetic Code _____

4. **Mode(s) Used to Transport Hazardous Materials:** Highway ____ Rail ____ Water ____ Air ____

5. **Business Size**

Standard Industrial Classification (SIC) Code for Primary Commercial Activity (enter one four-digit code):_____

Using the SBA definition criterion for the SIC code entered above, mark one:

_____Small Business as defined by SBA

_____Not an SBA Small Business

6. **Registration Fees**

	1 Year 2000-2001	2 Years 2000-2002	3 Years 2000-2003
If registrant is a **Small Business**, the fee is: If a follow-up to an expedited registration, no amount is due.	$300 0	$575 NA	$850 NA
If registrant is **Not a Small Business**, the fee is: If a follow-up to an expedited registration, the amount due is	$2,000 $1,700	$3,975 NA	$5,950 NA
If registration is for a year prior to 2000-2001, the fee for each year is $300			

*Total Amount Enclosed:*_____

Make check or money order in U.S. funds, drawn on a U.S. bank, and payable to "U.S. Department of Transportation," and identified as payment for the "Hazmat Registration Fee."

Method of Payment

Check ____ Money Order ____ Credit Card: *VISA* ____ *MasterCard* ____ *American Express* ____ *Discover* ____

Credit Card Users Please Provide the Following Information:

Card Number: ☐☐☐☐☐☐☐☐☐☐☐☐☐☐☐☐ Expiration Date: ☐☐ ☐☐ (MO YR)

Name as it appears on the card _____

Authorized Signature _____

Cardholder acknowledges ordering goods or services in the amount of the total shown hereon and agrees to perform the obligations set forth in the Cardholder's agreement with the issuer. Credit card statement will list this payment as "US DOT Hazmat Regis."

NOTE: If a **Small Business** completing an expedited registration, **do not** resubmit credit card information here.

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7. Prior-Year Survey Information. Mark all categories and activities engaged in during the previous calendar year (e.g., 1999 for the 2000-2001 Registration Year) and the state(s) in which you operated (see instructions).

A. ____ Offered or transported in commerce a highway route controlled quantity of a Class 7 (radioactive) material.

1. Shipper ____ 2. Carrier ____ 3. Other (Freight Forwarder, Agent, etc.) ____

AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN
MO MS MT NC ND NE NH NJ NM NV NY OH OK OR PA RI SC SD TN TX UT
VT VA WA WV WI WY 48 Contiguous States AK AS DC GU HI MP PR VI

B. ____ Offered or transported in commerce more than 25 kilograms (55 pounds) of a Division 1.1, 1.2, or 1.3 (explosive) material in a motor vehicle, rail car, or freight container.

1. Shipper ____ 2. Carrier ____ 3. Other (Freight Forwarder, Agent, etc.) ____

AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN
MO MS MT NC ND NE NH NJ NM NV NY OH OK OR PA RI SC SD TN TX UT
VT VA WA WV WI WY 48 Contiguous States AK AS DC GU HI MP PR VI

C. ____ Offered or transported in commerce more than 1 liter (1.06 quarts) per package of a material extremely toxic by inhalation (materials poisonous by inhalation that meet one of the defining criteria for Hazard Zone A).

1. Shipper ____ 2. Carrier ____ 3. Other (Freight Forwarder, Agent, etc.) ____

AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN
MO MS MT NC ND NE NH NJ NM NV NY OH OK OR PA RI SC SD TN TX UT
VT VA WA WV WI WY 48 Contiguous States AK AS DC GU HI MP PR VI

D. ____ Offered or transported in commerce a hazardous material (including a hazardous waste) in a bulk packaging (see 49 CFR 171.8) having a capacity equal to or greater than 13,248 liters (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids.

1. Shipper ____ 2. Carrier ____ 3. Other (Freight Forwarder, Agent, etc.) ____

AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN
MO MS MT NC ND NE NH NJ NM NV NY OH OK OR PA RI SC SD TN TX UT
VT VA WA WV WI WY 48 Contiguous States AK AS DC GU HI MP PR VI

E. ____ Offered or transported in commerce a shipment, in other than a bulk packaging, of 2,268 kilograms (5,000 pounds) gross weight or more of one class of hazardous material (including a hazardous waste) for which placarding of a vehicle, rail car, or freight container is required.

1. Shipper ____ 2. Carrier ____ 3. Other (Freight Forwarder, Agent, etc.) ____

AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN
MO MS MT NC ND NE NH NJ NM NV NY OH OK OR PA RI SC SD TN TX UT
VT VA WA WV WI WY 48 Contiguous States AK AS DC GU HI MP PR VI

F. ____ Offered or transported in commerce a shipment of a quantity of hazardous material that requires placarding of the bulk packaging, freight container, unit load device, transport vehicle, or rail car, other than those included in A through E above. Activities performed by farmers are generally excepted. See 49 CFR 107.601(b).

1. Shipper ____ 2. Carrier ____ 3. Other (Freight Forwarder, Agent, etc.) ____

AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN
MO MS MT NC ND NE NH NJ NM NV NY OH OK OR PA RI SC SD TN TX UT
VT VA WA WV WI WY 48 Contiguous States AK AS DC GU HI MP PR VI

G. ____ Did not engage in any of the activities listed in A through F during the previous calendar year.

8. Certification of Information. I certify that, to the best of my knowledge, the above information is true, accurate, and complete.

Certifier's Name _____ Date _____
(Print the signer's name)

Title _____ Phone (___ ___ ___)___ ___ ___-___ ___ ___ ___

Certifier's Signature _____

FALSE STATEMENTS MAY VIOLATE 18 U.S.C. 1001.

MAIL COMPLETED FORM WITH PAYMENT TO:

U.S. Department of Transportation
Hazardous Materials Registration
P.O. Box 740188
Atlanta, GA 30374-0188

Please retain a copy of this form for your records.

Two Letter State Abbreviations

Alabama	AL	Kentucky	KY	Ohio	OH
Alaska	AK	Louisiana	LA	Oklahoma	OK
American Samoa	AS	Maine	ME	Oregon	OR
Arizona	AZ	Maryland	MD	Pennsylvania	PA
Arkansas	AR	Massachusetts	MA	Puerto Rico	PR
California	CA	Michigan	MI	Rhode Island	RI
Colorado	CO	Minnesota	MN	South Carolina	SC
Connecticut	CT	Mississippi	MS	South Dakota	SD
Delaware	DE	Missouri	MO	Tennessee	TN
Dist. Columbia	DC	Montana	MT	Texas	TX
Florida	FL	Nebraska	NE	Utah	UT
Georgia	GA	Nevada	NV	Vermont	VT
Guam	GU	New Hampshire	NH	Virgin Islands	VI
Hawaii	HI	New Jersey	NJ	Virginia	VA
Idaho	ID	New Mexico	NM	Washington	WA
Illinois	IL	New York	NY	West Virginia	WV
Indiana	IN	North Carolina	NC	Wisconsin	WI
Iowa	IA	North Dakota	ND	Wyoming	WY
Kansas	KS	N. Mariana Is.	MP		

REGISTRATION PHONE NUMBERS

Hazardous Materials Registration Program

Form and Instructions	(617) 494-2545
Automated Fax-on-Demand service for brochure and form (request document 700)	(800) 467-4922
Four Weeks and No Certificate?	(617) 494-2545
Registration Information and Answers	(202) 366-4109
General Hazardous Materials Information - Hazardous Materials Information Center	(800) 467-4922
Expedited Registration	(800) 942-6990
Verify U.S. DOT ID Number (FMCSA/OMC)	(800) 832-5660
SBA Size and SIC Code Questions (SBA)	(202) 205-6533
Copy of Relevant Regulations (49 CFR Parts 100 to 185)	(202) 512-1800

SCHN00246933

Selected Small Business Administration Size Standards by SIC Industry

NOTE: If the four-digit code for your primary industry group does not appear below, check the SBA Internet site at http://www.sbaonline.sba.gov/regulations/siccodes/ for the complete listing of codes and size criteria.

SIC	Description	Size Standards in Number of Employees or Millions of Dollars
Division A - AGRICULTURE, FORESTRY AND FISHING (Major Groups 01- 09)		
Division B - MINING (Major Groups 10 -14)		
Division C - CONSTRUCTION (Major Groups 15 -17)		
Division D - MANUFACTURING (Major Groups 20 - 39)		
Major Group 28 - CHEMICALS AND ALLIED PRODUCTS		
Major Group 29 - PETROLEUM REFINING AND RELATED INDUSTRIES		
2911	Petroleum Refining	1,500
2992	Lubricating Oils and Greases	500
Division E - TRANSPORTATION, COMMUNICATIONS ELECTRIC, GAS, AND SANITARY SERVICES (Major Groups 40 - 49)		
Major Group 40 - RAILROAD TRANSPORTATION		
4011	Railroads, Line-Haul Operating	1,500
4013	Railroad Switching and Terminal Establishments	500
Major Group 42 - MOTOR FREIGHT TRANSPORTATION AND WAREHOUSING		
4212	Local Trucking Without Storage	$18.5
	EXCEPT Garbage and Refuse Collection, Without Disposal	$6.0
4213	Trucking, Except Local	$18.5
4214	Local Trucking With Storage	$18.5
4225	General Warehousing and Storage	$18.5
4226	Special Warehousing and Storage, N.E.C.*	$18.5
Major Group 47 - TRANSPORTATION SERVICES		
4731	Arrangement of Transportation of Freight and Cargo	$18.5
Major Group 49 - ELECTRIC, GAS, AND SANITARY SERVICES		
4953	Refuse Systems (includes hazardous waste disposal sites)	$6.0
Division F - WHOLESALE TRADE (Major Groups 50 - 51)		
Major Group 51 - WHOLESALE TRADE - NONDURABLE GOODS		
5169	Chemical and Allied Products, N.E.C.*	100
5171	Petroleum Bulk Stations and Terminals	100
5172	Petroleum and Petroleum Products Wholesalers, except Bulk Stations and Terminals	100
5191	Farm Supplies	100
Division G - RETAIL TRADE (Major Groups 52 -59)		
Major Group 54 - FOOD STORES		
5411	Grocery Stores	$20.0
Major Group 55 - AUTOMOTIVE DEALERS AND GASOLINE SERVICE STATIONS		
5541	Gasoline Service Stations	$6.5
Major Group 59 - MISCELLANEOUS RETAIL		
5983	Fuel Oil Dealers	$9.0
5984	Liquefied Petroleum Gas (Bottled Gas) Dealers	$5.0
5989	Fuel Dealers, N.E.C.*	$5.0
Division H - FINANCE, INSURANCE, AND REAL ESTATE (Major Groups 60 - 67)		
Division I - Services (Major Groups 70 - 87)		
Major Group 72 - PERSONAL SERVICES		
7215	Coin-Operated Laundries and Drycleaning	$5.0
7216	Drycleaning Plants, Except Rug Cleaning	$3.5
Major Group 73 - BUSINESS SERVICES		
7342	Disinfecting and Pest Control Services	$5.0
Major Group 75 - AUTOMOTIVE REPAIR SERVICES AND PARKING		
7538	General Automotive Repair Shops	$5.0
Major Group 80 - HEALTH SERVICES		
8062	General Medical and Surgical Hospitals	$5.0
8071	Medical Laboratories	$5.0
Major Group 82 - EDUCATIONAL SERVICES - Public schools excepted by 49 CFR 107.606(a)		
8211	Elementary and Secondary Schools	$5.0
8221	Colleges, Universities, and Professional Schools	$5.0
8222	Junior Colleges and Technical Institutes	$5.0
Division K - NONCLASSIFIABLE ESTABLISHMENTS		
9999	Nonclassifiable Establishments	$5.0

* N.E.C., Not Elsewhere Classified

SCHN00246934

Hazardous Materials Emergency Preparedness (HMEP)

Grants Made for Use in Fiscal Year 2000

Alaska	$55,396	*0.7%*
Alabama	$158,656	*1.9%*
Arkansas	$98,074	*1.2%*
Arizona	$109,987	*1.3%*
California	$652,701	*7.7%*
Colorado	$112,131	*1.3%*
Connecticut	$101,084	*1.2%*
District of Columbia	$50,374	*0.6%*
Delaware	$60,418	*0.7%*
Florida	$291,039	*3.4%*
Georgia	$191,961	*2.3%*
Hawaii	$60,250	*0.7%*
Iowa	$140,917	*1.7%*
Idaho	$79,161	*0.9%*
Illinois	$425,763	*5.0%*
Indiana	$204,516	*2.4%*
Kansas	$157,486	*1.9%*
Kentucky	$121,334	*1.4%*
Louisiana	$139,745	*1.6%*
Massachusetts	$145,769	*1.7%*
Maryland	$126,690	*1.5%*
Maine	$72,468	*0.9%*
Michigan	$227,442	*2.7%*
Minnesota	$174,391	*2.0%*
Missouri	$181,584	*2.1%*
Mississippi	$119,496	*1.4%*
Montana	$79,161	*0.9%*
North Carolina	$203,843	*2.4%*
North Dakota	$104,099	*1.2%*
Nebraska	$124,179	*1.5%*
New Hampshire	$70,290	*0.8%*
New Jersey	$208,697	*2.5%*
New Mexico	$99,244	*1.2%*
Nevada	$78,995	*0.9%*
New York	$339,237	*4.0%*
Ohio	$355,639	*4.2%*
Oklahoma	$127,193	*1.5%*
Oregon	$123,679	*1.5%*
Pennsylvania	$282,670	*3.3%*
Rhode Island	$62,257	*0.7%*
South Carolina	$123,344	*1.4%*
South Dakota	$83,010	*1.0%*
Tennessee	$165,519	*1.9%*
Texas	$432,624	*5.1%*
Utah	$94,392	*1.1%*
Virginia	$163,008	*1.9%*
Vermont	$56,401	*0.7%*
Washington	$133,219	*1.6%*
Wisconsin	$174,554	*2.1%*
West Virginia	$96,567	*1.1%*
Wyoming	$67,112	*0.8%*
American Samoa	$44,182	*0.5%*
Guam	$45,186	*0.5%*
Northern Mariana Islands	$44,181	*0.5%*
Puerto Rico	$92,381	*1.1%*
US Virgin Islands	$44,686	*0.5%*
Cherokee Nation - OK	$9,480	*0.1%*
Ely Shoshone Tribe - NV	$16,975	*0.2%*
Menominee Indian Tribe - WI	$12,000	*0.1%*
Mississippi Band of Choctaw Indians - MS	$11,195	*0.1%*
Pyramid Lake Paiute Tribe - NV	$39,498	*0.5%*
Salish & Kootenai - MT	$20,000	*0.2%*
Shingle Springs Rancheria - CA	$5,375	*0.1%*
St. Regis Mohawk Tribe - NY	$18,926	*0.2%*
Grand Total	$8,511,831	*100%*

SCHN00246935

U.S. Department of Transportation
Research and Special Programs
Administration
Hazardous Materials Registration
Program, DHM-60
400 7th Street, S.W.
Washington, DC 20590

U.S. DOT Hazmat
Registration Program
Materials Enclosed
New Requirements for 2000-2001

Do You Offer or Transport HAZMAT in Commerce?

Then you may need to sign up with:

New Requirements for 2000-2001 Registration Year

2000-2001 Instructions

U.S. Department of Transportation
Research and Special Programs
Administration

SCHN00246936

Please print or type. (Form designed for use on elite 12 pitch typewriter.)

344009

NON-HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. O·R·D·0·9·9·1·5·5·5·7·4	Manifest Document No. 9·1·7·1·9	2. Page 1 of 1

3. Generator's Name and Mailing Address
SCHNITZER STEEL
12005 N. BURGARD ST.
PORTLAND, OR 97210
4. Generator's Phone (503) 286-6944 ATTN: JIM JAKUBIAK

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter's Phone
ENVIROTECH SYSTEMS, INC.	W·A·D·9·8·1·7·6·5·9·6·9	(206) 363-9000
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter's Phone

9. Designated Facility Name and Site Address	10. US EPA ID Number	C. Facility's Phone
CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812	O·R·D·0·8·9·4·5·2·3·5·3	541-454-2643

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. MATERIAL NOT REGULATED BY DOT	003	CW	0.32 00	P
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A. CWM #CL2780, ESI #9-145-12-1 X004

E. Handling Codes for Wastes Listed Above
CERTIFICATE OF DISPOSAL REQUIRED
4380P 2.19T
412-4-10-12-25-100-1X

15. Special Handling Instructions and Additional Information

EMERGENCY INFORMATION CONTACT {206} 363-9000 OR {425} 771-0452.

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Gloria Christian	G. Christian	05	28	99

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
SCOTT R. LINDSAY	Scott R.	05	28	99

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Gloria Christ				

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Crystal Boyce	Crystal A Boyce	06	03	99

GENERATOR TRANSPORTER FACILITY

Printed by: THELER & ASSOCIATES, INC. Detroit, MI 48237-0360

ORIGINAL - RETURN TO GENERATOR

SCHN00246958

CWM OF THE NORTHWEST
Federal EPA ID: ORD089452353
17629 CEDAR SPRINGS LANE
ARLINGTON, OR 97812

SCHNITZER STEEL PRODUCTS INC
ATTN: MANIFEST SECTION
ORD099155574
12005 N BURGARD ST
PORTLAND OR 97203-6422

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc. has received waste material from SCHNITZER STEEL PRODUCTS INC on 06/03/99 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 91719.

Profile Number: CL2780
CWM Tracking ID: 34400901
Process: LANDFILL
Treatment Date: 06/04/99

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Carol Evans

LYNN MURRILL
RECORDS SUPERVISOR
Certificate # 61350
06/14/99

SCHN00246959

ENVIROTECH

FACSIMILE COVER SHEET

Sending Fax: (206) 546-1920

Pages in this transmission: 1 *(Including cover sheet)*

Date: 8-4-98

TO: Facsimile #: 503-286-6948

Name: JIM JAKUBIAK

Company: SCHNITZER STEEL

FROM: Name: ATWOOD

Subject:

CONFIDENTIALITY NOTICE

This facsimile (this page and any accompanying page(s)) is (are) intended only for the use of the individual or entity to which is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, **you are hereby notified that any dissemination, distribution or copying of this communication, or the taking of any action in reliance on the contents of this information, may be strictly prohibited.** If you have received this facsimile in error, please notify Envirotech Systems, Inc. immediately by telephone (collect), and return the original message to Envirotech Systems, Inc. at the below address via the U.S. Postal Service (postage guaranteed). Thank You.

If you did not receive all of the pages or find that they are illegible, please call as soon as possible at (206) 363-9000.

If this ☐ is checked please call the sending party at (206) 363-9000 to discuss the information contained in this transmission.

SENDER COMMENTS: PLEASE APPROVE THE FOLLOWING CHANGES ON HWM # 81989 SHIPPED FROM BURGARD SITE ON 6-26-98

LINE 11A CHANGE PSN TO: FLAMMABLE LIQUIDS, N.O.S., 3, UN1993, PG II

SIGNATURE: [signature] DATE: 8/6/98

forms\fax-covr.frm

ENVIROTECH SYSTEMS, INC.
18820 AURORA AVENUE NO, STE 201 ◆ SEATTLE, WASHINGTON 98133-3914 ◆ 206 363 9000 ◆ FAX 206 546 1920

ENSCO
environmental systems company

CERTIFICATION NO.
00235247

1737 EAST DENNI STREET WILMINGTON, CA 90744 (310) 631-2330

INVOICE NO.
282120

CERTIFICATE OF TREATMENT/DISPOSAL

ENVIROTECH SYSTEMS, INC.
ATTN: MIKE JEFFERS
18820 AURORA AVE N., STE 201
SHORELINE, WA 98133

SCHNITZER STEEL
ATTN: TIM TODD
~~12005 N. BURGARD~~ P.O. Box 10047
PORTLAND, OR ~~97203~~ 97210

ENSCO CERTIFIES THAT THE ITEMS ASSOCIATED WITH THE SHIPMENT IDENTIFIED BY MANIFEST CA098342836, MD# 81989 RECEIVED FROM SCHNITZER STEEL HAVE BEEN PROCESSED AS DESCRIBED BELOW:

SEQ #	DESCRIPTION	TREATMENT DATES	TREATMENT DISPOSAL METHOD
001	WASTE FLAMMABLE LIQUID NOS 3 UN 1993 PG II	08/14/98-08/14/98	INCINERATION

IF YOU HAVE ANY QUESTIONS REGARDING THIS CERTIFICATE OF TREATMENT/DISPOSAL, PLEASE CONTACT YOUR ENSCO SALES REPRESENTATIVE.

RECEIVED
AUG 28 1998
ENVIROTECH SYSTEMS, INC.

NAME Mike R. Jeffers

TITLE West Coast Director of Operations

DATE 8/17/98

ENSCO INCORPORATED

SCHN00246970

LAND DISPOSAL RESTRICTION NOTIFICATION FORM
For Wastes Subject to the Treatment Standards Found in 40 CFR 268

Generator Name: Schnitzer Steel Manifest No.: 9834 2836

WMDS	Wastewater	Non-wastewater	Waste Codes * and Subcategories	Special Conditions
74394	☐	☒	CESQG OA Code 531	
	☐	☐		
	☐	☐		
	☐	☐		
	☐	☐		
	☐	☐		
	☐	☐		
	☐	☐		
	☐	☐		
	☐	☐		

*The Underlying Hazardous Constituents must be identified for waste streams which carry the EPA Waste Codes, F001-F005, F039, D001 (only D001 Not Treated by CMBST or RORGS), D002, D012-D043 (only D012-D043 if treated in Non-CWA, Non-CWA equivilent or Non-SDWA facilities). Include a copy of the Universal Treatment Standards Sheet for each affected WMDS or List the constituents for each affected WMDS.

Special Conditions:

A. Waste Requiring No Further Treatment
B. Lab Pack Waste Qualifying for Alternative Treatment under 40 CFR 268.42(c)
C. Hazardous Waste Debris subject to standard treatment requirements, 40 CFR 268.45
D. Hazardous Waste Debris subject to alternative standards in 40 CFR 268.45 (List Contaminants)
E. Waste Qualifying for Exemption and not subject to Land Disposal Restriction (Explain)
F. Waste already treated to remove a hazardous characteristic which requires additional treatment for underlying hazardous constituents (List constituents)
G. For Chemical Manufacturers, Petroleum Refineries, Coke By-Product Facilities and RCRA TSDFs handling wastes subject to 40 CFR 61 subpart FF ONLY: This waste is a "Controlled Benzene Waste" which is subject to the notification requirements of 40 CFR 61 subpart FF.

Waste analysis is attached where available, otherwise, the information contained herein is based upon my thorough knowledge of the waste(s).

I hereby certify that I believe that the information I submitted is true, accurate and complete.

Signature _____ Title _____ Date _____

Waste Streams Identified by Special Condition A: I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Waste Streams Identified by Special Condition B: I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only wastes which have not been excluded under appendix IV to 40 CFR 268 or solid wastes not subject to regulation under 40 CFR 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Waste Streams Identified by Special Condition F: I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

ENVIROTECH SYSTEMS, INC.
18820 AURORA AVENUE NORTH, SUITE 201
SEATTLE, WA 98133-3914
TELEPHONE: (206) 363-9000 FAX: (206) 546-1920

WASTE PRODUCT QUESTIONNAIRE

PROFILE

ESI WPQ

Generator U.S. EPA I.D.	Sample Numbers	Date
[illegible]		[illegible]

Generator Name	Billing Address (if other than site)
SCHNITZER STEEL	SCHNITZER STEEL
Site Address	
12005 N. BURGARD	12005 N. BURGARD
PORTLAND, OR 97203	PORTLAND, OR 97203

Generator Contact	Title	Phone
TIM TODD OR JIM JARUNIAK		503-286-6944

WASTE PRODUCT DESCRIPTION & CHARACTERISTICS

Waste Product Name	Process Generating Waste
[illegible]	OUT OF DATE PRODUCT

ODOR: ☐ None ☐ Mild XX ☐ Strong
Describe: AMONIA

COLOR/CLARITY: Semi Transparent

PHYSICAL STATE AT 70°F: ☐ Solid ☐ Sludge XX ☐ Liquid ☐ Powder
Average Consistency

TOXIC CATEGORIES PRESENT
WDOE Equivalent Conc.
Batch/Monthly Weight 1-220 lbs

LAYERS: ☐ Multi-Layered ☐ Bi-Layered XX ☐ Homogenous
Free Liquids 100 %

pH: ☐ ≤ 2 XX ☐ 10.1-12.4 ☐ 2-4 ☐ ≥ 12.5 ☐ 4.1-10 ☐ Exact

DENSITY OR SPECIFIC GRAVITY: 0.8 - 1.0
XX ☐ Liquid lbs/gal ☐ Solid lbs/ft³ XX

FLASH POINT: ☐ < 73°F ☐ > 200°F XX ☐ CC ☐ EPA Ignitable ☐ 73° - 141°F ☐ No Flash ☐ OC ☐ DOT Combustible ☐ 142° - 199°F ☐ Exact

CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL)

			Tox Cat
Tox Scan XX ☐ Positive	TRIMETHYLHEXAMETHYLENE	%	
☐ Negative	DIAMINE	95-100 %	
	WATER	0-5 %	
		%	
Halogenated Organic Compounds (HOC's) PPM		%	
		%	
		%	
Chemical Nature I ☐ O ☐ I/O ☐		%	
Generator has provided the following		%	
☐ Sample		%	
☐ MSDS		%	
☐ Waste Analysis		%	

METALS

XX ☐ Total (PPM)
☐ EPA TCLP

Arsenic (As)	NS
Barium (Ba)	NS
Cadmium (Cd)	NS
Chromium (Cr)	NS
Copper (Cu)	NS
Lead (Pb)	NS
Mercury (Hg)	NS
Nickel (Ni)	NS
Selenium (Se)	NS
Silver (Ag)	NS
Zinc (Zn)	NS
Hexchrome	NS
Other	NS

PESTICIDES PPM

Endrin	NA
Lindane	NA
Methoxychlor	NA
Toxaphene	NA
2,4-D	NA
2,4,5-T	NA
Other	NA

REACTIVES & OTHER WASTE

Cyanides	NS	PCB's	NS
Sulfides	NS	Phenolics	NS
Amines	NS	Other	NS

SHIPPING INSTRUCTIONS

Is this a DOT Hazardous Material XX ☐ Yes ☐ No
Reportable Quantities ☐ DOT RQ ☐ EPA RQ
Is Waste ☐ Poison ☐ Inhalation Hazard ☐ Dangerous when wet
Method of Shipment ☐ Bulk Liquid ☐ Bulk Solid XX ☐ Drum (Size/Type) [illegible]
Anticipated Volume/Units per Batch/Frequency 1-[illegible]

EPA/WASHINGTON STATE HAZARDOUS PROPERTIES

XX ☐ US EPA Hazardous Waste Codes [illegible]
☐ WA State Hazardous Waste Codes
State Designation XX ☐ DW ☐ EHW
Is Waste Product XX ☐ Corrosive ☐ Water Reactive ☐ Oxidizer ☐ Pyrophoric ☐ Shock Sensitive ☐ Carcinogen ☐ Etiological ☐ Explosive ☐ None of Above
XX ☐ Subject to Land Disposal Restrictions (If checked, attach completed notification)

U.S. DOT DESCRIPTION

( ) TRIMETHYLHEXAMETHYLENEDIAMINES SOLUTION
Proper Shipping Name — Additional Required Description

Hazard Class 8 DOT I.D. Number UN2327 Packing Group Number PGIII

GENERATOR CERTIFICATION STATEMENT

I hereby certify that all information submitted in this document and those attached hereto is true and correct. All waste tendered under this waste profile shall conform to the specifications listed above. To the best of my knowledge, all known and suspected hazardous components (40 CFR 261 & 268) of this waste stream have been identified above.

Signature X [signature] for Schnitzer Steel Title Project Manager Date 6/26/98

The undersigned certifies that he/she obtained a representative sample of the waste material above referenced, and that the following representations are true and correct.

Sampling Method DRUM THIEF Amount 350ml Name

Source of Material Sampled Signature Date

PRINTED ON RECYCLED PAPER

SCHN00246972

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-99)
Please print or type. *Form designed for use on elite (12-pitch) typewriter.*

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ORD099115574 Manifest Document No. 819 89

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
SCHNITZER STEEL ATTN: JIM/TIM
12005 N. BURGARD, PORTLAND, OR 97203
4. Generator's Phone (503) 286-6944

A. State Manifest Document Number: 98342836
B. State Generator's ID
C. State Transporter's ID
D. Transporter's Phone: (206) 363-9000
E. State Transporter's ID
F. Transporter's Phone: (303) 426-2991
G. State Facility's ID
H. Facility's Phone: (310) 835-0775

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC.
6. US EPA ID Number: WAD987176596

7. Transporter 2 Company Name: SPECIALIZED DEDICATED FLEETS
8. US EPA ID Number: DER000000098

9. Designated Facility Name and Site Address
ENSCO WEST, INC.
1737 EAST DENNI ST.
WILMINGTON, CA 90744
10. US EPA ID Number: CAD044429835

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. TRIMETHYLHEXAMETHYLENEDIAMINES SOLUTION 8 UN2327 PGIII	001	DM	00005	G	State 531 / EPA/Other CESQG
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

Additional Descriptions for Materials Listed Above
A. WNDS#743954, ESI#8-163-11-2 ERG 153

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information

FOR EMERGENCY INFORMATION, CONTACT (206) 363-9000 or (425) 771-0452.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: James L. Jakobiak Sr. Estimator | Signature | Month 06 Day 26 Year 98

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: SCOTT R. LINDSAY | Signature | Month 06 Day 26 Year 98

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Month Day Year

GENERATOR — TRANSPORTER — FACILITY

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802. WITHIN CALIFORNIA, CALL 1-800-852-7550

98342836

DO NOT WRITE BELOW THIS LINE.

SC 8022A (4/97)
A 8700—22

Yellow: GENERATOR RETAINS

SCHN00246973

10142

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 8198
2. Page 1 of 1

3. Generator's Name and Mailing Address
SCHNITZER STEEL
12005 N. BURGARD
PORTLAND, OR 97203
4. Generator's Phone (503) 286-6944 ATTN: JIM/TIM

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC.
6. US EPA ID Number: WAD981765969
A. Transporter's Phone: (206) 363-9000

7. Transporter 2 Company Name
8. US EPA ID Number
B. Transporter's Phone

9. Designated Facility Name and Site Address
SOL-PRO, INC.
1825 ALEXANDER AVENUE
TACOMA, WA 98421
10. US EPA ID Number: WAD981769110
C. Facility's Phone: 206-627-4822

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. NON REGULATED WASTE LIQUID	001	DM	00008	G
b.				
c.				
d.				

ORIGINAL RETURNED TO GENERATOR
JUL - 7 1998

D. Additional Descriptions for Materials Listed Above
A. SP # , ESI #8-163-11-1, B

E. Handling Codes for Wastes Listed Above
CMBST
RORGS

15. Special Handling Instructions and Additional Information

EMERGENCY INFORMATION CONTACT (206) 363-9000 OR (425) 771-0452.

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name: X Jim Jakobiak for Schnitzer Steel
Signature: X James F. Jakobiak
Month Day Year: 06 26 98

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: SCOTT R. LINDSAY
Signature: Scott R.
Month Day Year: 06 26 98

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: James Blackmer
Signature: James Blackmer
Month Day Year: 07 06 98

GENERATOR | TRANSPORTER | FACILITY

ORIGINAL - RETURN TO GENERATOR

SCHN00246976

trk. 9816

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 8 1 9 8 7
2. Page 1 of 1

GENERATOR

3. Generator's Name and Mailing Address
SCHNITZER STEEL
12005 N. BURGARD
PORTLAND, OR 97203

4. Generator's Phone (503) 286-6944 ATTN: TIM/JIM

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC.
6. US EPA ID Number: W A D 9 8 1 7 6 5 9 6 9
A. Transporter's Phone: (206) 363-9000

7. Transporter 2 Company Name
8. US EPA ID Number
B. Transporter's Phone

9. Designated Facility Name and Site Address
COLUMBIA RIDGE LANDFILL & RECYCLING CENTER
18177 CEDAR SPRINGS LANE
ARLINGTON, OR 97812
10. US EPA ID Number: O R D 9 8 7 1 7 3 4 5 7
C. Facility's Phone: (541)454-2030

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. MATERIAL NOT REGULATED BY D.O.T.	001	DM	00030	G
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A. CRL #445522, ESI #8-163-11

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
EMERGENCY INFORMATION CONTACT (206) 363-9000 OR (425) 771-0452.

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
X James L. Jakubiak for Schnitzer Steel	X James L. Jakubiak	06	26	98

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
SCOTT R. LINDSAY	Scott R. [illegible]	06	26	98

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Angela Timmerman	Angela Timmerman	07	1	98

Tonya Heidemann 7-8-98

ORIGINAL - RETURN TO GENERATOR

SCHN00246977

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.:
2. Page 1 of 1

3. Generator's Name and Mailing Address
SCHNITZER STEEL
12005 N. BURGARD
PORTLAND, OR 97203
4. Generator's Phone (503) 286-6944 ATTN: TIM/JIM

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC.
6. US EPA ID Number: WAD981765969
A. Transporter's Phone: (206) 363-900

7. Transporter 2 Company Name:
8. US EPA ID Number:
B. Transporter's Phone:

9. Designated Facility Name and Site Address
COLUMBIA RIDGE LANDFILL & RECYCLING CENTER
18177 CEDAR SPRINGS LANE
ARLINGTON, OR 97812
10. US EPA ID Number: ORD987173457
C. Facility's Phone: (541)454-2030

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. MATERIAL NOT REGULATED BY D.O.T.	001	DM	00030	G
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A. CRL #445522, ESI #8-163-11

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

EMERGENCY INFORMATION CONTACT (206) 363-9000 OR (425) 771-0452.

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
X James L. Jakobsen for Schnitzer Steel	X James J. Jakobsen	06	26	98

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
SCOTT R. LINDSAY	[signature]	06	26	98

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

GENERATOR TRANSPORTER FACILITY

GENERATOR'S COPY

SCHN00246978

ENVIROTECH SYSTEMS, INC.
18820 AURORA AVENUE NORTH, SUITE 201
SEATTLE, WA 98133-3914
TELEPHONE: (206) 363-9000 FAX: (206) 546-1920

WASTE PRODUCT QUESTIONNAIRE

PROFILE

ESI WPQ 8-163-11

Generator U.S. EPA I.D.	Sample Numbers	Date
EXEMPT		6/22/98

Generator Name	Billing Address (if other than site)
SCHNITZER STEEL	SCHNITZER STEEL
Site Address: 12005 N. BURGARD	12005 N. BURGARD
PORTLAND , OR 97203	PORTLAND , OR 97203

Generator Contact	Title	Phone
TIM TODD OR JIM JAKUBIAK		503-286-6944

WASTE PRODUCT DESCRIPTION & CHARACTERISTICS

Waste Product Name	Process Generating Waste
[illegible]	UNUSED PRODUCT

ODOR: [X] None [ ] Mild [ ] Strong
Describe

COLOR/CLARITY: Opaque

PHYSICAL STATE AT 70°F: [X] Solid [ ] Sludge [ ] Liquid [ ] Powder
Average Consistency

TOXIC CATEGORIES PRESENT
WDOE Equivalent Conc
Batch/Monthly Weight) 220 lbs

LAYERS: [ ] Multi-Layered [ ] Bi-Layered [X] Homogenous
Free Liquids 0 %

pH: [ ] ≤ 2 [ ] 10.1-12.4 [ ] 2-4 [ ] ≥ 12.5 [ ] 4.1-10 [X] Exact

DENSITY OR SPECIFIC GRAVITY: 0.8 - 1.0
[ ] Liquid lbs/gal
[X] Solid lbs/ft³

FLASH POINT: [ ] <73°F [ ] > 200°F [X] CC [ ] EPA Ignitable [ ] 73° - 141°F [X] No Flash [ ] OC [ ] DOT Combustible [ ] 142° - 199°F [ ] Exact

CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL)

			Tox Cat
Tox Scan [ ] Positive	TITANIUM DIOXIDE	94-100 %	
[X] Negative	OTHER INERT MATERIAL	0-6 %	
		%	
		%	
Halogenated Organic Compounds (HOC's) PPM		%	
		%	
		%	
		%	
Chemical Nature [X] O [ ] I/O [ ]		%	
		%	
		%	
		%	
		%	

Generator has provided the following
[X] Sample
[ ] MSDS
[X] Waste Analysis

METALS
[X] Total (PPM)
[ ] EPA TCLP

Arsenic (As)	NS
Barium (Ba)	NS
Cadmium (Cd)	NS
Chromium (Cr)	NS
Copper (Cu)	NS
Lead (Pb)	NS
Mercury (Hg)	NS
Nickel (Ni)	NS
Selenium (Se)	NS
Silver (Ag)	NS
Zinc (Zn)	NS
Hexchrome	NS
Other	NS

PESTICIDES PPM

Endrin	NA
Lindane	NA
Methoxychlor	NA
Toxaphene	NA
2,4-D	NA
2,4,5-T	NA
Other	NA

REACTIVES & OTHER WASTE

Cyanides	NS	PCB's	NS
Sulfides	NS	Phenolics	NS
Amines	NS	Other	NS

SHIPPING INSTRUCTIONS

Is this a DOT Hazardous Material [ ] Yes [X] No
Reportable Quantities [ ] DOT RQ [ ] EPA RQ
Is Waste [ ] Poison [ ] Inhalation Hazard [ ] Dangerous when wet
Method of Shipment [ ] Bulk Liquid [ ] Bulk Solid
[X] Drum (Size/Type) 1A2-30
Anticipated Volume/Units per Batch/Frequency 1-NA

EPA/WASHINGTON STATE HAZARDOUS PROPERTIES

[ ] US EPA Hazardous Waste Codes
[ ] WA State Hazardous Waste Codes
State Designation [ ] DW [ ] EHW
Is Waste Product [ ] Corrosive [ ] Water Reactive [ ] Oxidizer [ ] Pyrophoric [ ] Shock Sensitive [ ] Carcinogen [ ] Etiological [ ] Explosive [X] None of Above
[ ] Subject to Land Disposal Restrictions (If checked, attach completed notification)

U.S. DOT DESCRIPTION

( ) MATERIAL NOT REGULATED BY D.O.T.
Proper Shipping Name — Additional Required Description
Hazard Class — DOT I.D. Number — Packing Group Number

GENERATOR CERTIFICATION STATEMENT

I hereby certify that all information submitted in this document and those attached hereto is true and correct. All waste tendered under this waste profile shall conform to the specifications listed above. To the best of my knowledge, all known and suspected hazardous components (40 CFR 261 & 268) of this waste stream have been identified above.

Signature X James J. Cahulah for Schnitzer Steel Title Project Manager Date 6/26/98

The undersigned certifies that he/she obtained a representative sample of the waste material above referenced, and that the following representations are true and correct.

Sampling Method DRUM THIEF Amount 350ml Name

Source of Material Sampled Signature Date

PRINTED ON RECYCLED PAPER

SCHN00246979

To Reorder Call FORFORMS • (206) 364-8470

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 81988
2. Page 1 of 1

3. Generator's Name and Mailing Address
SCHNITZER STEEL
12005 N. BURGARD
PORTLAND, OR 97203

4. Generator's Phone (503) 286-6944 ATTN: JIM/TIM

5. Transporter 1 Company Name: ENVIROTECH SYSTEMS, INC.
6. US EPA ID Number: WAD981765969
A. Transporter's Phone: (206) 363-900

7. Transporter 2 Company Name:
8. US EPA ID Number:
B. Transporter's Phone:

9. Designated Facility Name and Site Address
SOL-PRO, INC.
1825 ALEXANDER AVENUE
TACOMA, WA 98421
10. US EPA ID Number: WAD981769110
C. Facility's Phone: 206-627-4822

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. NON REGULATED WASTE LIQUID	001	DM	00008	G
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A. SP # , ESI #8-163-11-1, B

E. Handling Codes for Wastes Listed Above
CMBST
RORGS

15. Special Handling Instructions and Additional Information

EMERGENCY INFORMATION CONTACT (206) 363-9000 OR (425) 771-0452.

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
X Jim Jakubiak for Schnitzer Steel	X [signature]	06	26	98

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
SCOTT R. LINOSAY	[signature]	06	26	98

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

GENERATOR

TRANSPORTER

FACILITY

GENERATOR'S COPY

SCHN00246980

ENVIROTECH SYSTEMS, INC.
18820 AURORA AVENUE NORTH, SUITE 201
SEATTLE, WA 98133-3914
TELEPHONE: (206) 363-9000 FAX: (206) 546-1920

WASTE PRODUCT QUESTIONNAIRE

PROFILE

ESI WPQ 8-165-11-1

Generator U.S. EPA I.D. | Sample Numbers | Date 6/22/98

Generator Name: SCHNITZER STEEL | Billing Address (if other than site)

Site Address: 12005 N. BURGARD | 12005 N. BURGARD

PORTLAND, OR 97203 | PORTLAND, OR 97203

Generator Contact: JIM TUSO OR JIM JANUBIAK | Title | Phone 503-286-6944

WASTE PRODUCT DESCRIPTION & CHARACTERISTICS

Waste Product Name: [illegible] | Process Generating Waste: OUT OF SPEC PRODUCT

ODOR: ☐ None ☒ Mild ☐ Strong
Describe: RESIN, GAS

COLOR/CLARITY: VARIES
Opaque

PHYSICAL STATE AT 70°F: ☐ Solid ☐ Sludge ☒ Liquid ☐ Powder
Average Consistency: RESIN

TOXIC CATEGORIES PRESENT
WDOE Equivalent Conc.
Batch/Monthly Weight: 1 220 lbs

LAYERS: ☐ Multi-Layered ☐ Bi-Layered ☒ Homogenous
Free Liquids: 100 %

pH: ☐ ≤ 2 ☐ 10.1-12.4 ☐ 2-4 ☐ ≥ 12.5 ☐ 4.1-10 ☐ Exact

DENSITY OR SPECIFIC GRAVITY: 0.8 - 1.0
☐ Liquid lbs/gal ☒ Solid lbs/ft³

FLASH POINT: ☐ <73°F ☒ > 200°F ☐ CC ☐ EPA Ignitable ☐ 73° - 141°F ☐ No Flash ☐ OC ☐ DOT Combustible ☐ 142° - 199°F ☐ Exact

CHEMICAL COMPOSITION (ACCOUNT FOR 100% OF TOTAL)

Tox Scan: ☐ Positive ☒ Negative

		Tox Cat
POLYESTER RESIN	85-95 %	
WATER	5-10 %	
GASOLINE	5-10 %	
	%	
	%	
	%	
	%	
	%	
	%	
	%	
	%	
	%	

Halogenated Organic Compounds (HOC's) PPM

Chemical Nature: I ☐ O ☒ I/O ☐

Generator has provided the following: ☒ Sample ☐ MSDS ☒ Waste Analysis

METALS

☒ Total (PPM) ☐ EPA TCLP

Arsenic (As)	NS
Barium (Ba)	NS
Cadmium (Cd)	NS
Chromium (Cr)	NS
Copper (Cu)	NS
Lead (Pb)	NS
Mercury (Hg)	NS
Nickel (Ni)	NS
Selenium (Se)	NS
Silver (Ag)	NS
Zinc (Zn)	NS
Hexchrome	NS
Other	NS

PESTICIDES PPM

Endrin	NA
Lindane	NA
Methoxychlor	NA
Toxaphene	NA
2,4-D	NA
2,4,5-T	NA
Other	

REACTIVES & OTHER WASTE

Cyanides	NS	PCB's	NS
Sulfides	NS	Phenolics	NS
Amines	NS	Other	NS

SHIPPING INSTRUCTIONS

Is this a DOT Hazardous Material: ☐ Yes ☒ No
Reportable Quantities: ☐ DOT RQ ☐ EPA RQ
Is Waste: ☐ Poison ☐ Inhalation Hazard ☐ Dangerous when wet
Method of Shipment: ☐ Bulk Liquid ☐ Bulk Solid ☒ Drum (Size/Type) 1A2-16
Anticipated Volume/Units per Batch/Frequency: 1-HR

EPA/WASHINGTON STATE HAZARDOUS PROPERTIES

☐ US EPA Hazardous Waste Codes
☐ WA State Hazardous Waste Codes
State Designation: ☐ DW ☐ EHW
Is Waste Product: ☐ Corrosive ☐ Water Reactive ☐ Oxidizer ☐ Pyrophoric ☐ Shock Sensitive ☐ Carcinogen ☐ Etiological ☐ Explosive ☒ None of Above
☐ Subject to Land Disposal Restrictions (If checked, attach completed notification)

U.S. DOT DESCRIPTION

( ) NON REGULATED WASTE LIQUID
Proper Shipping Name | Additional Required Description
Hazard Class | DOT I.D. Number | Packing Group Number

GENERATOR CERTIFICATION STATEMENT

I hereby certify that all information submitted in this document and those attached hereto is true and correct. All waste tendered under this waste profile shall conform to the specifications listed above. To the best of my knowledge, all known and suspected hazardous components (40 CFR 261 & 268) of this waste stream have been identified above.

Signature X James J. Jakubik for Schnitzer Steel Title Project Manager Date 6/26/98

The undersigned certifies that he/she obtained a representative sample of the waste material above referenced, and that the following representations are true and correct.

Sampling Method: DRUM THIEF Amount: 350ml Name

Source of Material Sampled | Signature | Date

PRINTED ON RECYCLED PAPER

SCHN00246981

Oregon

DEPARTMENT OF
ENVIRONMENTAL
QUALITY

December 31, 1997

Hazardous Waste Coordinator
Schnitzer Steel Products Co
PO Box 10047
Portland, OR 97210

DEQ ID Number: ORD099155574

Enclosed is your 1997 Registration Verification Report. This report was generated using information most recently reported by your facility. Your facility last notified DEQ that your status was Conditionally Exempt Generator (CEG).

What do I do with the Registration Verification Report (RVR)?

- Verify your generator status. Your generator status is determined by the largest amount of hazardous waste you generated or had on-site in <u>any</u> month during the calendar year.
- If the information in the left column is incorrect or incomplete, provide the correct information in the right column. You only need to fill in the spaces for information that has changed.
- Answer the questions and sign the certification on the reverse side of the RVR and return it to DEQ by **March 1, 1998**. Send the report to:

Oregon DEQ
Waste Management & Cleanup Division
Attn: Hazardous Waste Forms Clerk
811 SW Sixth Ave.
Portland, OR 97204-1390

How do I report if I was a LQG or SQG for any month in 1997?

If your facility generated more than 220 pounds of hazardous waste during any month in 1997, or accumulated more than 2,200 pounds of hazardous waste at any one time, your facility may be a Large Quantity Generator (LQG) or Small Quantity Generator (SQG). If so you must complete the 1997 Hazardous Waste Generation and Management Form. You may order copies of the form by completing the enclosed postcard and returning it to DEQ.

Why is accurate reporting important?

It is important that you report your generator status correctly, complete the answer sheet accurately and submit the information by **March 1, 1997**. DEQ uses this information for determining generator fees, determining regulatory compliance requirements, and establishing eligibility for participation in DEQ's Waste Reduction Assistance Program and CEG collection events.

If you need help...

- A DEQ map identifying regional offices is located on the back of this letter. If you have questions about hazardous waste regulations, including your generator status, please contact the Waste Reduction Assistance Program Staff at your nearest regional office.
- If you have questions regarding the report forms, please call 229-6938.

811 SW Sixth Avenue
Portland, OR 97204-1390
(503) 229-5696
TDD (503) 229-6993

DEQ-1

SCHN00246983

DEPARTMENT OF ENVIRONMENTAL QUALITY

Headquarters Office
811 SW Sixth Avenue
Portland, OR 97204
General Information: (503)229-5696, 229-5630
Toll-free inside Oregon 1-800-452-4011
TDD (503)229-6993
Fax (503)229-6124

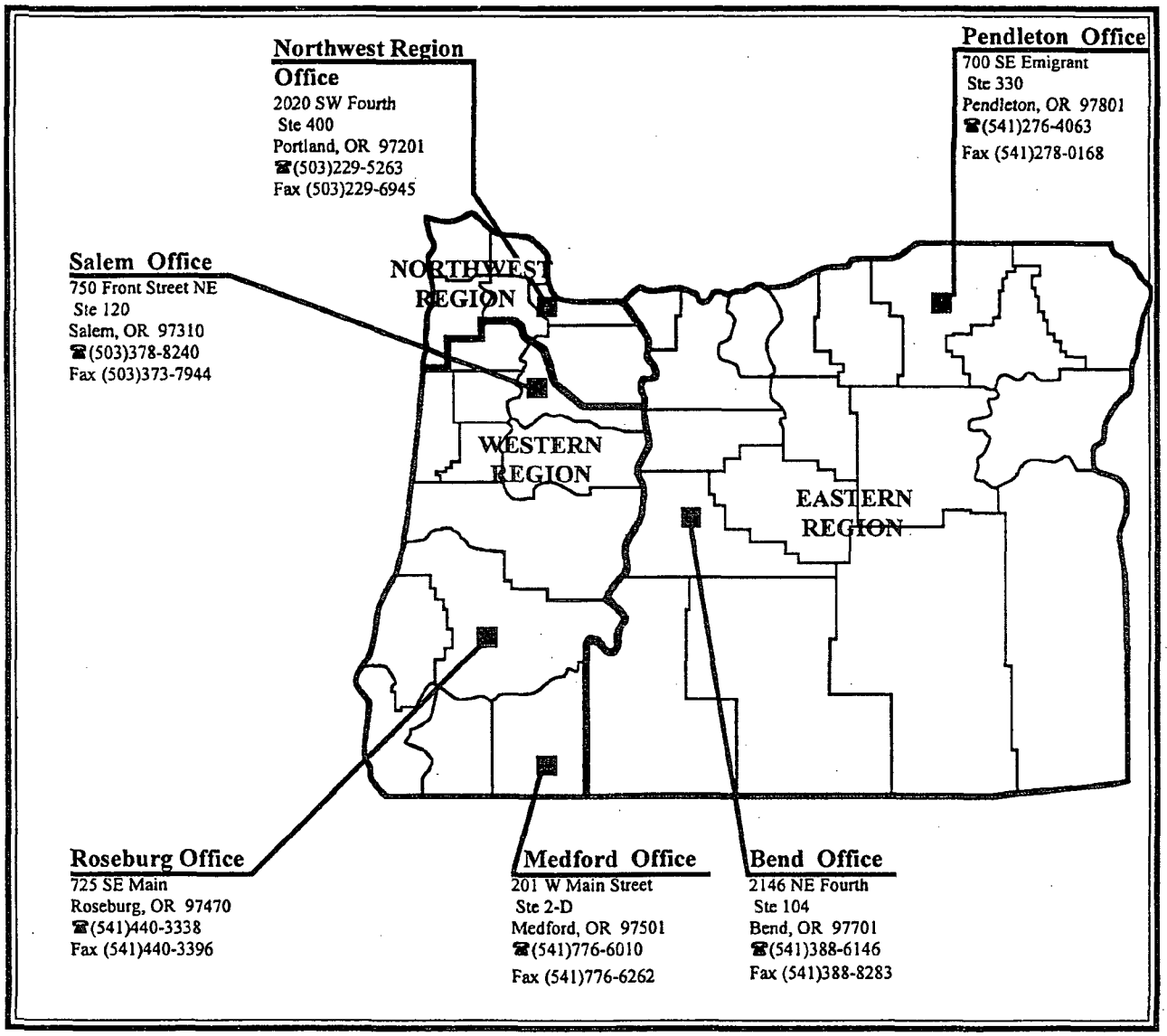
Air Quality Division
Information (503)229-5359

Water Quality Division
Information (503)229-5279

Waste Management & Cleanup Division
(Hazardous Waste, Solid Waste, Cleanup & Underground Storage Tanks)
Information (503)229-5913

Laboratory Division
1712 SW Eleventh Avenue
Portland, OR 97201
Telephone (503)229-5983
Fax (503)229-6924

DEQ regional and branch offices are located in three regions in Oregon.



[Revised December, 1997]

SCHN00246984

This Memorandum is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Page 1 of 1

HAZMAT ONE
(Name of carrier) (SCAC)

Shipper No.
Carrier No. TX000003020
Date 2/11/97

On Collect on Delivery shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

TO:
Consignee HAZMAT ONE
Street 87970 OBURG Road
City Eugene State OR Zip Code 97408

FROM:
Shipper S
Street 12005 N. BURGARD
City PORTLAND State OR Zip Code 97203
24 hr. Emergency Contact Tel. No.

Route

Vehicle Number

No. of Units & Container Type	HM	BASIC DESCRIPTION Proper Shipping Name, Hazard Class, Identification Number (UN or NA), Packing Group, per 172.101, 172.202, 172.203	TOTAL QUANTITY (Weight, Volume, Gallons, etc.)	WEIGHT (Subject to Correction)	RATE	CHARGES (For Carrier Use Only)
1DM		BALLASTS for TUCON				561.33

PLACARDS TENDERED: YES ☐ NO ☒

REMIT C.O.D. TO: ADDRESS

Note — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.
_____ Signature

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
_____ (Signature of Consignor)

C.O.D. FEE: PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES: $ 561.33

FREIGHT CHARGES
FREIGHT PREPAID except when box at right is checked ☐ Check box if charges are to be collect

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER
PER [signature]

CARRIER HMONE
PER [signature]
DATE 2/11/97

3

Permanent post-office address of shipper.

STYLE F60 LABELMASTER, An American Labelmark Co., Chicago, IL 60646 800/621-5808

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SCHN00246988

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] | Manifest Document No. [illegible]

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
SCHNITZER STEEL
[illegible]

4. Generator's Phone ( )

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name
[illegible]

6. US EPA ID Number
[illegible]

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

10. US EPA ID Number

G. State Facility's ID

H. Facility's Phone

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	1	ENVIRONMENTALLY HAZARDOUS SUBSTANCE RQ SOLID NOS, 9, UN3077	001	D	400	K	X002
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

[illegible]

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month Day Year
[illegible]		02 11 97

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year

Style F15 REV-6 Labelmaster, An American Labelmark Co., Chicago, IL 60646 (800)621-5808

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

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PRINTED WITH SOY INK

GENERATOR COPY

SCHN00246989

Oregon

DEPARTMENT OF
ENVIRONMENTAL
QUALITY

January 21, 1997

Tim Todd
Schnitzer Steel Products Co
PO Box 10047
Portland, OR 97210

Re: 1996 Annual Hazardous Waste Report

Dear Mr. Todd:

On December 31, 1996, DEQ mailed the 1996 Annual Hazardous Waste Report to your facility. You may have noticed that the Supplemental Reporting Forms booklet was not included. Due to changes in reporting requirements, DEQ is no longer printing the Supplemental Reporting Forms booklet. The booklet formerly included the Capacity Information Form and the Waste Received Form. The capacity information is no longer being collected.

Because of the small number of facilities required to complete the Waste Received Form, DEQ is no longer printing it as a booklet. The form and its instructions are enclosed in a handout format.

The Waste Received Form is still required to be completed by all facilities who receive hazardous waste from off-site. The form is due back to DEQ by March 1, 1997. Please mail the form to the address provided on page 2 of the forms instructions.

DEQ accepts this form submitted in electronic format. For information on electronic submission, please contact LaVelle Day at (503) 229-5060. If you have any other questions concerning this form, please call Chris Pickens at (503) 229-6352.

Sincerely,

Anne R. Price
Manager,
Hazardous Waste Planning & Program Development

Enclosure

811 SW Sixth Avenue
Portland, OR 97204-1390
(503) 229-5696
TDD (503) 229-6993
DEQ-1

SCHN00246993

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

June 16, 1997

Reply To
Attn Of: WCM-126

RE: RCRA Subpart CC Regulations
Compliance Assistance Seminar
Organic Air Emission Standards for Tanks,
Surface Impoundments, and Containers

Dear Hazardous Waste Coordinator:

On Tuesday, August 26, 1997, the United States Environmental Protection Agency (EPA) will conduct a one-day Compliance Assistance Seminar on Resource Conservation and Recovery Act (RCRA) Subpart CC--Air Emission Regulations. The seminar will take place from 9:00 a.m. to 4:00 p.m. in the Oregon Convention Center Ballroom, located at 777 N.E. Martin Luther King Jr. Boulevard, Portland, Oregon 97212.

RCRA air emission regulations deal with air emissions from hazardous waste management facilities. The chemicals processed during waste management operations can volatilize into the atmosphere and cause carcinogenic and other toxic effects or contribute to ozone formation. In June 1990, EPA promulgated regulations for process vents and equipment leaks that limit organic emissions from waste management units at Treatment, Storage and Disposal Facilities (TSDFs) requiring a permit under Subtitle C of RCRA. On December 6, 1994, additional RCRA regulations ("Subpart CC rules") were promulgated, limiting air emissions from tanks, surface impoundments, and containers used in managing hazardous waste at TSDFs and Large Quantity Generators (LQG). The Subpart CC rules were amended on November 25, 1996, and became effective December 6, 1996. Oregon will adopt these rules in August of 1997.

The major focus of this seminar will be on the technical aspects of implementing the control technologies required by the Subpart CC rules for tanks, surface impoundments, and containers at the affected facilities. Presentations and case studies will be used to examine the management of air emissions, application of alternative control technologies and test methods, as well as specific requirements of the RCRA regulations. The session will be open to interested individuals, waste management facilities' owners and operators, regulatory agency personnel, and others

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concerned with air emissions from waste management activities.

Enclosed for your information are 1) the draft agenda for the seminar; 2) the latest Federal Register (FR) on Subpart CC regulations, 61 FR 59931 (November 25, 1996); 3) fact sheet on new regulations to control volatile organic air emission from hazardous waste in tanks; and 4) fact sheet on new regulations to control volatile organic air emission from hazardous waste in containers.

The Subpart CC regulations appear in two Federal Registers (FR): 59 FR 62896 (December 6, 1994) and 61 FR 59931 (November 25, 1996). 59 FR 62896 and 61 FR 59931 may be accessed, at http://www.epa.gov/docs/fedrgstr/EPA-WASTE/1994/December/Day-06/pr-86.html and http://www.epa.gov/docs/fedrgstr/EPA-WASTE/1996/November/Day-25/pr-780.html, respectively. You may also obtain copies by calling the EPA RCRA Hotline at 1-800-424-9346.

No fee is charged for this compliance assistance seminar. However, registration is limited to 350 people on a first-come, first-served basis, and each participant will be asked to complete a brief survey form to assess the effectiveness of the course. Registration will occur on the day of the training. Please refer to the map for directions on how to get to the Oregon Convention Center. Parking is located on the south side of the convention center building and the parking fee is $5.00. The MAX/light rail is located on the north side of the convention center building. For questions on directions to the Oregon Convention Center, please call the EPA Portland Office at (503) 326-3250. If you have questions on the seminar content, please call Mr. Bruce Long at (503) 326-3686.

Sincerely,

Linda Liu, Coordinator
RCRA Subpart CC Seminar

Enclosures

cc: Elaine Glendening, Oregon DEQ
Mary Wahl, Oregon DEQ

RCRA SUBPART CC COMPLIANCE ASSISTANCE SEMINAR
August 26, 1997 DRAFT AGENDA

8:45-9:15 a.m.	Registration
9:15-9:20 a.m.	Welcome and Seminar Overview
9:20-10:20 a.m.	RCRA Subpart CC ○ Background ○ Applicability and Exemptions ○ Implementation
10:20-10:35 a.m.	Break
10:35-12:30 a.m.	Containers, Tanks, and Surface Impoundments Control Requirements
12:30- 1:30 p.m.	Lunch
1:30- 2:00 p.m.	Waste Determination
2:00- 2:10 p.m.	Test Method Overview
2:10- 2:30 p.m.	Treatment Options and Standards
2:30- 2:50 p.m.	Inter-relationships with Other EPA Programs
2:50- 3:05 p.m.	Break
3:05- 3:45 p.m.	Case Studies #1 and #2
3:45- 4:00 p.m.	Wrap-Up and Questions and Answers

DIRECTIONS

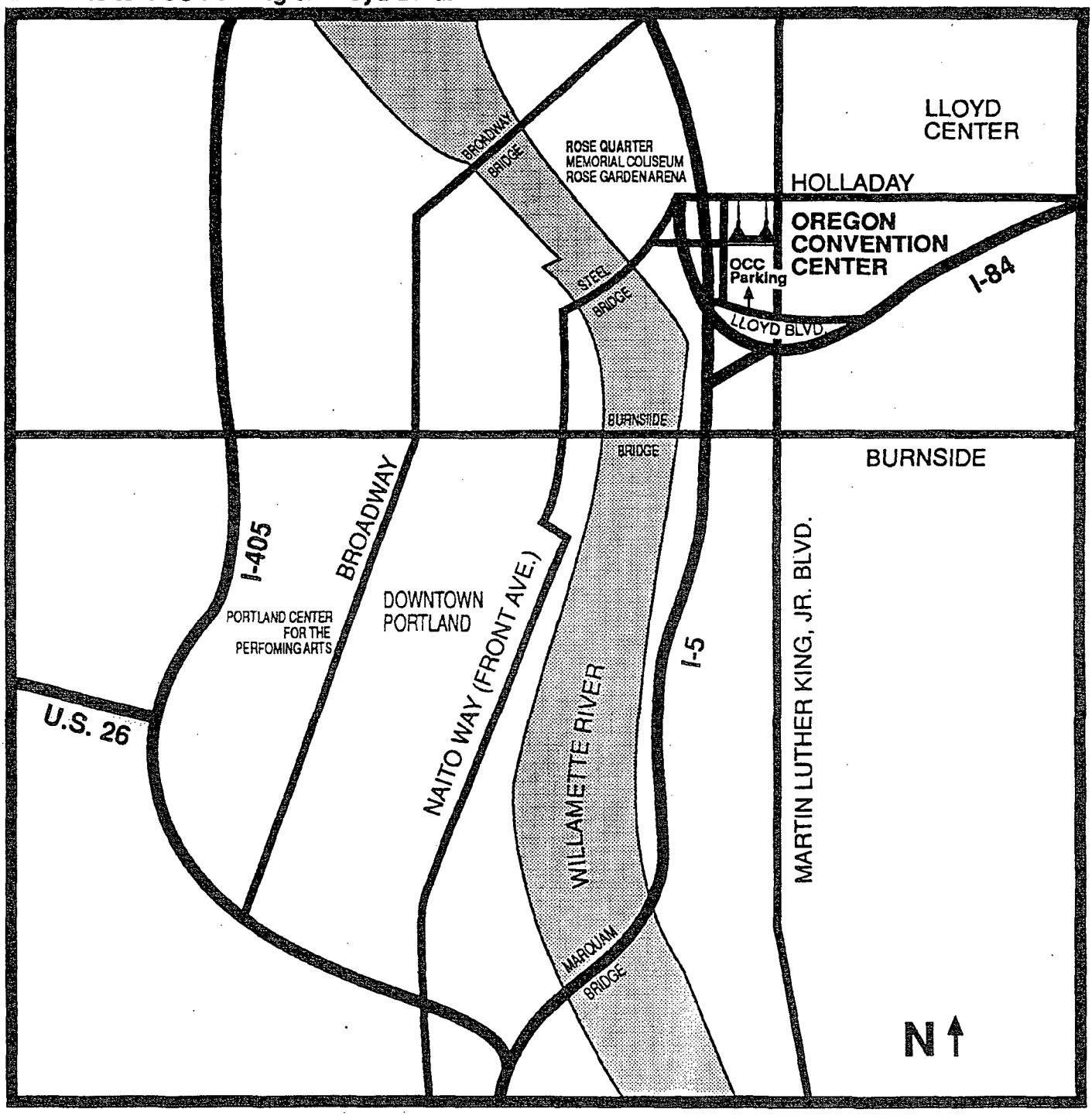
I-5 Northbound: Take Rose Quarter, Broadway/Weidler Street Exit **(Exit 302 A)**, Go right on Weidler, and right on Martin Luther King Jr. Blvd.

I-5 Southbound: Take Rose Quarter/City Center Exit, **(Exit 302A)** go across Broadway, then left on Weidler, and right on Martin Luther King Jr. Blvd.

From I-84: Tke Lloyd Blvd. Exit **(Exit 1)** stay on Lloyd Blvd. all the way to the Convention Center.

Look for theTowers
Oregon Convention Center
777 NE Martin Luther King Jr. Blvd.
Portland, OR 97212
503 235 7575

Entrance to OCC Parking on Lloyd Blvd.



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